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Renewable Northwest Project

October 10, 2006

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Commissioner John
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Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
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**RE: PacifiCorp's Preliminary Renewable Energy Action Plan,
Commitment O-26A, Docket UM 1209**

Dear Commissioners:

We are writing in response to PacifiCorp's September 21 filing in UM 1209, the Preliminary Renewable Energy Action Plan ("Plan").

Background

PacifiCorp's 2003 IRP Action Plan provided that the Company would acquire 1,400 MWs of renewables by 2014. The 1,400 MW target was reaffirmed in the 2004 IRP. MidAmerican committed to meeting this renewables target in its application to acquire PacifiCorp. Because progress towards meeting the target had been slow, we asked MidAmerican in the settlement process to provide a plan for how the 1,400 MWs would finally be achieved. The September 21 filing is a preliminary plan for how this target will be achieved. The final plan will be filed with its 2006 IRP.

Reaction to PacifiCorp's Preliminary Plan

We appreciate the Company providing this outline of its plans to acquire renewable energy. We've waited a long time to see progress towards this goal and we have welcomed recent announcements from PacifiCorp about its new wind and geothermal acquisitions.

The Plan includes some positive information, including: a commitment to support efforts to extend the federal Production Tax Credit (PTC); a commitment to play an active role in the regional wind integration efforts underway; plans to acquire community scale and large scale wind power; and continued plans for new transmission paths that can facilitate renewable development.

However, the Plan also represents a change in direction for the 1,400 MW target and reflects an attitude that concerns us. Based on this Plan, the 1,400 MW appears to have become a ceiling, as opposed to a floor, for renewable acquisition. It provides that PacifiCorp will continue to acquire renewables until they reach the 1,400 MWs or until they are no longer cost-effective. (Action Item, p. 4) In our view, the 1,400 MW has always been the minimum target over 10 years. Given the Company's existing reliance on coal power and its current plans to acquire a massive amount of new baseload --primarily coal -- power, PacifiCorp should continue to aggressively pursue all opportunities for new renewable resources. Further, PacifiCorp's new definition of renewable resources broadens the resources eligible to meet the target, reducing the amount of new renewables the Company plans to acquire.

We are also frustrated and weary of the refrain of "cost-effective" as it relates to PacifiCorp's plans for renewable resources. The Plan states that "the overriding criterion is that renewables be cost-effective." The Company's 2003 and 2004 IRPs already concluded that the 1,400 MWs of renewables are cost-effective. Second, many renewable resources are cost-effective today because PacifiCorp is actually acquiring new wind and geothermal projects. This Plan -- and the Company in general these days -- focuses only on cost as it relates to renewables and seems to completely ignore the other benefits of renewable resources. Namely that renewables are low-risk, emission-free and provide rate stability over the long-term. We think this Plan would be greatly improved by an acknowledgement of the important benefits renewables play in their portfolio.

Below we detail specific concerns with the Plan.

Definition of Renewables

According to the Preliminary Plan, PacifiCorp has adopted a new definition of renewables for purposes of meeting the 1,400 MW target. Their definition includes:

solar; wind; geothermal; solid, liquid or gaseous forms of biomass (including co-firing, wood mill waste and forest waste); landfill, coal mine or digester methane; wave or tidal power; new fresh water hydroelectric facilities or upgrades to existing hydroelectric facilities where the additional generation in either case does not result in new water diversions or impoundments; or hydrogen derived from either electrolysis or a non-hydrocarbon derivation process.

Up to this point, PacifiCorp had been using the definition of renewable resources from Oregon's SB 1149 to determine what qualified as renewable.¹ For example, the 2003-B RFP, intended to implement the 2003 IRP, stated that "wind, geothermal, solar, biomass, digester gas, landfill gas and hydro resources (outside protected areas)" were eligible to bid. We also note that the Company's website says: "PacifiCorp provided for 1,400 mw of **new wind and geothermal resources** in its 10-year Integrated Resource Plan." <http://www.pacificorp.com/Navigation/Navigation551.html> (emphasis added).

¹ SB 1149 defined eligible renewable resources as: (a) Electricity generation facilities fueled by wind, waste, solar or geothermal power or by low-emission nontoxic biomass based on solid organic fuels from wood, forest and field residues. (b) Dedicated energy crops available on a renewable basis. (c) Landfill gas and digester gas. (d) Hydroelectric facilities located outside protected areas as defined by federal law in effect on the effective date of this 1999 Act.

Now, the Company has created a new definition for purposes of meeting this long-standing target. We understand this was due in part to settlement condition O26b related to how hydro upgrades would be used to meet the 1,400 target. We have several concerns about this definition:

Hydropower

Hydro upgrades at existing facilities are a good way for the company to get more power from their hydro projects with the same amount of water. But they weren't envisioned as part of the original 1,400 MW target. Plus, hydro eligible for the target is no longer limited by the requirement that it be "outside protected areas." We are concerned about the removal of that restriction, particularly given that their definition includes new hydropower projects.

Biomass

We support PacifiCorp's exploration of biomass opportunities in Oregon, given the available state incentives. But we are concerned with their broad definition of biomass. We do not consider all biomass to be a renewable resource. The Plan does not include any restriction on the kinds of wood mill or forest waste that may be acquired by the company. Such restrictions might include: wood that has been coated with paints or chemical preservatives (e.g., creosote, copper-chrome arsenic); wood that comes from old growth forest; and black liquor. We support high efficiency co-generation and encourage the Company to explore these opportunities with its industrial customers, but we would like to see a more narrow definition of biomass for the Company's renewable acquisitions.

Coal mine methane

Coal mine methane has also been added to the Company's definition of renewables. Again, this is a change from the original definition relied on by PacifiCorp. We know of no existing definition of renewable resources that includes coal mine methane and we have serious concerns about any methane capture where the underlying resource is a fossil fuel.

Hydrogen

The definition includes the derivation of hydrogen by electrolysis or a non-hydrocarbon process. The resulting use of the hydrogen can only be considered a renewable resource if the electricity used to separate the hydrogen is generated by a renewable resource.

What Counts

PacifiCorp plans to consider all of its QF resources as renewable whether or not it owns the associated green tags or renewable energy credits associated with the energy project. While we understand there may be regulatory restrictions to obtaining tags from QF projects, we strenuously object to PacifiCorp counting as renewable anything for which it doesn't also own the green tags.

This clearly violates Green-e rules, which state:

Disclosure for Customer Sited Renewables: Generator cannot claim, to be selling renewable electricity if they sell the TRCs separately. http://www.green-e.org/ipp/trc_standard.html

It also violates general legal guidance on this topic, as established by the National Association of Attorneys General. These guidelines state:

Using a tradable certificates (or "tagging") system to substantiate electricity product or company claims raises an additional and significant issue of consumer understanding and acceptance. Under a tagging system, the environmentally preferable attributes of specific power generation-the "premium" associated with preferred generation-are available to be sold separately from the power itself.

For any claim that is based on a tagging system, the supplier should have certificates that reliably establish that, for the period relevant to the claim, the supplier purchased the sole rights to the claimed attributes in an amount adequate to meet consumption demand for the product consistent with the claimed attributes. In addition, no more than one certificate should be issued for any one unit of power. To help consumers understand what they are buying, it is recommended that the claim be accompanied by a clear and prominent disclosure of the use of a tagging system to substantiate the claim.

An example from the NAAG Guidelines is particularly relevant here:

Ex. 4. Western Hydropower, a company that generates hydroelectric power in a region that allows for tradable tags, sells to another facility tags representing the hydroelectric nature of the power generated. The company then markets the untagged energy under the name Western Hydropower, thus implying that the electricity still has the attributes that were sold with the tag. The company's marketing scheme is deceptive.

It would be consumer fraud for PacifiCorp to count renewable QF energy as renewable, and to represent this as part of their system mix, if other parties, who own the RECs associated with that power, are also making claims to that renewable energy.

Transmission

We support PacifiCorp's exploration of the best areas for wind development through the IRP process. But we think some of the information about transmission in the Plan is misleading. The Plan states that because wind projects have relatively low load factors that this can have the "effect of tripling the cost of transmission on a dollar-per-megawatt-hour basis." There are no lines in the Northwest that are fully utilized 100% of the time. It is therefore unrealistic to compare the amount of time that wind would use a line to 100% utilization.² We know that on dollar-per-megawatt-hour basis, transmission may be more

² Study work done by the Seams Steering Group – Western Interconnection shows that most transmission lines in the West typically use less than 75% of their capacity during half or less of their operating hours. See CDEAC Transmission Task Force Report, fig. 3, page 22. <http://www.westgov.org/wga/initiatives/cdeac/TransmissionReport-final.pdf>

expensive for wind than for base load resources. However, it is important to make sure that we are comparing the cost of delivered energy for resources, not strictly their transmission cost.

Thank you for considering our comments as you review PacifiCorp's Preliminary Renewable Energy Action Plan.

Sincerely,

A handwritten signature in cursive script that reads "Ann English Gravatt".

Ann English Gravatt
Policy Director

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **RENEWABLE NW PROJECT'S 10/10/06 LETTER RESPONSE TO PACIFICORP'S PRELIMINARY RENEWABLE ENERGY ACTION PLAN DATED 9/21/06** on the following persons on October 10, 2006, by e-mailing, hand-delivering, faxing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

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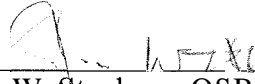
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DATED this 10th day of October, 2006.

ESLER STEPHENS & BUCKLEY

By: 
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Project