

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
AR 518 – Phase II**

In the Matter of a Rulemaking to
Implement SB 838 Relating to Renewable
Portfolio Standard

STAFF'S COMMENTS

Pursuant to the Notice of Proposed Rulemaking Hearing of November 12, 2008, staff of the Public Utility Commission of Oregon (staff) submits comments in Phase II of this proceeding.

Staff has been meeting with stakeholders for more than a year to develop rules to implement the Oregon Renewable Energy Act (ORS 469A.005 to 469A.210 – “Act”) for the electric companies and electricity service suppliers (ESSs). In Phase I of this proceeding, the Commission amended OAR 860-038-0005 and 860-038-0480 pursuant to portions of the Act related to the public purpose charge for energy efficiency and renewable resources.

In the current phase (Phase II), staff recommends the Commission adopt new rules to clarify renewable energy certificates that may be used to meet Renewable Portfolio Standards (RPS) under the Act, particularly as they relate to power source disclosures required under OAR 860-038-0300. Staff is proposing the rules at this time because the disclosure requirements are ongoing and, as described further below, the utilities are banking renewable energy certificates issued as of 2007 toward RPS compliance. Staff also recommends at this time amendments to OAR 860-038-0220 and 860-038-0300 to streamline reporting on environmental claims, renewable energy portfolio options and the Oregon RPS.

Staff intends to propose the remaining rules for RPS implementation by mid-2009.¹

The Act requires all utilities in the state to meet Renewable Portfolio Standards. The standard for large utilities, including Portland General Electric (PGE) and PacifiCorp, is 25 percent renewable energy serving retail load by 2025, with interim standards of 5 percent by 2011, 15 percent by 2015 and 20 percent by 2020. Electricity service suppliers (ESSs) serving customers in PGE's or PacifiCorp's service area must meet a comparable standard. Small utilities including Idaho Power must meet a standard of 5 percent or 10 percent renewable energy by 2025, depending on retail sales in Oregon.

¹ Including the methodology for determining the annual revenue requirement for ORS 469A.100, adopted by the Commission at its June 10, 2008, public meeting.

The primary way to comply with the standards is through the use of renewable energy certificates. ORS 469A.130 requires the Oregon Department of Energy (ODOE) to establish a system of renewable energy certificates that can be used to establish compliance. The statute further expressly states that the Western Renewable Energy Generation Information System (WREGIS) is an acceptable program for this purpose. WREGIS issues one certificate for each megawatt-hour of qualifying electricity.

The Act allows certificates to be carried forward, or “banked,” to meet requirements in the future, instead of the year the certificates are issued. At the same time, the law does not allow a utility or ESS to meet the RPS with certificates that previously have been used, traded, sold or otherwise transferred.

In a recent rulemaking proceeding, ODOE established WREGIS as the system to be used for issuing, monitoring, accounting for and transferring RECs.² ODOE also adopted January 1, 2007, as the first issuance date for eligible RECs. Certificates issued on or after that date, from facilities that otherwise are eligible for the Oregon RPS, can be banked for future RPS compliance.

Renewable Portfolio Standard Rules

In the current phase of the AR 518 proceeding, staff proposes initial rules under a new division (Division 083), Renewable Portfolio Standards. The first section establishes the scope and applicability of the rules. The other section proposed at this time clarifies the renewable energy certificates that electric companies and ESSs may use to meet the RPS.

Under the proposed rules, an electric company or ESS may use a certificate to comply with both the RPS and power source disclosures under OAR 860-038-0300 only if both uses occur in the same year. In other words, a certificate banked for future RPS compliance may be used in power source disclosures only for the year the certificate is *actually used* for compliance with the RPS.

As noted above, the primary way an electric company or ESS may meet RPS requirements is through the use of renewable energy certificates. *See generally* ORS 469A.070. Importantly, ORS 469A.140(3) further provides that, once a certificate has been used to comply with the RPS (or if it has been traded, sold or otherwise transferred), it may not be used again to comply with the RPS in a subsequent calendar year.

OAR 860-038-0300 was adopted pursuant to ORS 757.659. That statute provides, in relevant part:

² See OAR 330-160-0005 to -0030.

[T]he Public Utility Commission shall adopt rules as are necessary to implement ORS 757.600 to 757.667. Rules adopted by the commission shall address at least the following:

...

(3) Requirements for consumer protection. Consumer protection rules adopted by the commission that relate to electricity service suppliers shall be applicable throughout this state and shall, at a minimum, contain provisions for the disclosure of price, power source and environmental impact in contract offers and marketing information.

ORS 757.659(3).

Consistent with ORS 757.659(3), OAR 860-038-0300 imposes disclosure requirements upon electric companies and ESSs relating to “price, power source, and environmental impact information necessary for consumers to exercise informed choice.” See OAR 860-038-0300(1). The Commission has traditionally applied OAR 860-038-0300 as more than just a non-binding consumer disclosure statement about power sources that were potentially available to the electric company or ESS. Rather, the Commission views the information provided in response to OAR 860-038-0300 as representing a statement by the electric company or ESS that the power sources shown were actually used to meet consumer consumption. This interpretation is supported by language in the rule itself, such as “For *power supplied*...the electric company must report power source...information.” See OAR 860-038-0300(4) (emphasis added).

In adopting OAR 860-038-0300, the Commission observed that the rule was important because it would provide consumers sufficient information to make informed decisions about their choice of electricity supplier:

This rule requires electric companies and ESSs to provide price, power source, and environmental impact information to consumers. This information will allow consumers to make informed decisions about their choice of electricity supplier... We conclude that it provides a sound framework for the important requirement of disclosure to all consumers of price, power source, and environmental impact. The consistency in format dictated by the rule will be of aid to consumers. The time frames set out for disclosure are reasonable. The rule provides a clear description of the specific information required.

See Commission Order No. 00-596 at 11-12.

Staff’s proposed AR 518 rule is based upon the same “power supplied” standard for power source reporting requirements as is found in OAR 860-038-0300. In other words, the proposed rule treats power sources reported under OAR 860-038-0300 (including RECs) as “using” those resources as that term (“used”) appears in ORS 469A.140(3). Accordingly, under the proposed AR 518 rule, if an electric company or ESS relies upon a REC in its OAR 860-038-0300 reporting, that REC cannot be banked for later use.

The proposed AR 518 rule is within the Commission's authority to adopt. It is clearly consistent with the concept of "use," meaning "used" to meet actual consumer consumption, found in ORS 469A.140(3) and the "power supplied" standard in OAR 860-038-0300.

Staff understands that PGE and PacifiCorp have not included in power source disclosures RECs the companies intend to bank toward future RPS compliance.³ To the extent the utilities sold or otherwise transferred RECs generated in 2007, those RECs are no longer available to the utility for compliance with the Oregon RPS. Further, to prevent disclosure of information in a manner inconsistent with the draft rules staff was considering in Docket AR 518, the Commission granted both utilities a waiver from power source disclosure during the second and third quarters of 2008, when the utilities typically would be reporting calendar year 2007 data.⁴ See Docket Nos. UM 1370 and UM 1376.

OAR 860-038-0300(3) requires power source disclosure be provided "using a format prescribed by the Commission." The Commission adopted the prescribed format at its November 20, 2001, public meeting. After the Commission issues an order in the current phase of the AR 518 rulemaking, staff intends to discuss further with stakeholders whether changes in the format are warranted, particularly in light of the Oregon RPS.

Rule Amendments Related to Portfolio Options and Environmental Claims

The proposed rule amendments (OAR 860-038-0220 and 860-038-0300) align timelines and reporting on portfolio options under ORS 757.603(2), and environmental claims under ORS 757.659, with timelines and reporting required under the Oregon Renewable Energy Act. The Act requires that a utility or electricity service supplier "true up" its RPS obligations for the compliance year by March 31st of the following year. See ORS 469A.070(2). In other words, a utility or ESS can acquire by that date bundled RECs (including the associated power) or unbundled RECs (not including the associated power) to make up for any shortfalls toward meeting the percentage renewable energy obligation for the preceding calendar year.⁵

OAR 860-038-0300 requires utilities and ESSs to file by April 1st each year an environmental claims reconciliation report for the previous calendar year for any

³ Staff expects the utilities to confirm this understanding in their comments in this proceeding.

⁴ The utilities disclose power sources for the preceding year, after they have received annual net system mix data from ODOE under OAR 860-038-0005(37) and 860-038-0030(4). For fourth quarter 2008 power source disclosures, PGE used 2007 data, excluding qualifying electricity the company intends to bank for future RPS compliance; PacifiCorp used 2006 data, avoiding the issue entirely.

⁵ The utility also can make an alternative compliance payment under ORS 469A.180 by that date to comply with its RPS obligation for the preceding calendar year.

claims made for power sources other than the net system mix.⁶ Staff recommends changing this date to June 1st to allow the utility to account for the RECs they acquire through March 31st. Staff also recommends the Commission require supporting documentation from the REC tracking system selected by ODOE for the Oregon RPS. As noted above, ODOE has selected WREGIS for this purpose.

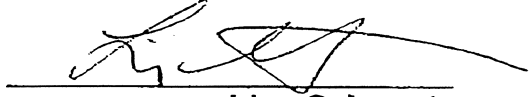
Regarding the voluntary renewable energy “portfolio options” under ORS 757.603(2), the Commission previously adopted a two-year true-up period for a utility to acquire RECs in fulfillment of its sales to retail customers. See recommendation no. 7 adopted in Order No. 01-337 (Docket UM 1020). (“Delivery date of new renewable resources should be within two years of the effective date of customer sign-up.”) For example, if a customer purchased RECs through a portfolio option in January 2009, the utility does not have to acquire RECs to fulfill the customer’s purchase until January 2011.

This long true-up period is inconsistent with Green-e standards for voluntary green power programs.⁷ It also is inconsistent with the true-up period for the Oregon RPS, which requires REC acquisitions within the compliance calendar year or in the three months following. Consistent with the Oregon RPS, staff recommends the Commission require the utilities acquire RECs by March 31st each year to fulfill consumer purchases through portfolio options for the prior calendar year.

⁶ “‘Net system power mix’ means the mix of all power generation within the state or other region less all specific purchases from generation facilities in the state or region, as determined by the Oregon Department of Energy.” See OAR 860-038-0005(37).

⁷ Green-e administers a national certification program for voluntary renewable energy options. The standard for vintage of eligible resources states, “A Green-e Energy Certified product may include only renewables that are generated in the calendar year in which the product is sold, the first three months of the following calendar year, or the last six months of the prior calendar year.” Standard available at: http://www.green-e.org/docs/energy/Appendix%20D_Green-e%20Energy%20National%20Standard.pdf

Dated at Salem, Oregon, this 7th day of January 2009



Lisa Schwartz
Senior Analyst/Lead Worker
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CERTIFICATE OF SERVICE

AR 518

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to the following parties or attorneys of parties.

Dated at Salem, Oregon, this 7th day of January, 2009.

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