

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

MAY 21, 2009

AR 518 PHASE III

IN THE MATTER OF A RULEMAKING TO IMPLEMENT SB 838 RELATING TO RENEWABLE PORTFOLIO STANDARDS	OREGON DEPARTMENT OF ENERGY REPLY COMMENTS
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The Oregon Department of Energy (ODOE) submits these reply comments in response to written comments provided in advance of, and testimony presented during, the Public Hearing of May 18, 2009.

The reply comments of Staff [May 19, 2009] and CUB/RNP [May 21, 2009] capture ODOE's position and interpretation of statute on these matters. For brevity, those arguments are not reiterated here beyond noting that ODOE supports the modified draft rules of May 19, 2009 and appreciates the usefulness of the event calendar submitted as supplemental comments [May 21, 2009].

Of particular note, ODOE supports the position and reasoning of Staff and CUB/RNP concerning the "use" of a REC and incremental costs of qualifying electricity.

Respectfully submitted,

May 21, 2009



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