

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 518 – Phase II

In the Matter of a Rulemaking to)
Implement SB 838 Relating to Renewable) Comments of the
Portfolio standard) Citizens' Utility Board of Oregon and
) Renewable Northwest Project
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CUB and RNP support the PUC Staff's proposed rules in this phase of the rulemaking.

Both CUB and RNP have been champions of disclosure of power source and environmental impact for electric power. Just as we have ingredient labeling for corn flakes, consumers deserve ingredient labeling for electricity. Regulatory oversight is important to ensure that the ingredient label is accurate.

The rules proposed by Staff are designed to protect the integrity of environmental disclosure and prevent double counting of the environmental attributes of renewable power. Under the proposed rules RECs that are banked to use for future compliance with the Renewable Portfolio Standard (RPS) can only be reported in power source disclosure label for the year that they are used for RPS compliance. This is the

appropriate policy. Because utilities can bank RECs for future compliance with the RES, it is essential that they not be allowed to claim the green attributes twice: once in the year that the power is generated (but the REC is banked) and once in the year that the REC is reported for compliance purposes.

CUB and RNP also support staff's recommendation for a true-up period of three months following the compliance year for both RPS compliance and the voluntary green power programs. RNP is on the board of the Green-e program and both RNP and CUB fully support REC acquisitions that are consistent with Green-e standards.

CUB recommends that the Commission adopt the proposed new rules (OAR 860-083-0005 and 860-083-0050) and amendments to existing rules (OAR 860-38-0220 and OAR 860-38-0300) in Phase 2 of AR 518.

Respectfully Submitted,

January 12, 2009

A handwritten signature in black ink, appearing to read "Bob Jenks", written in a cursive style.

Bob Jenks
Executive Director

AR 518 – CERTIFICATE OF SERVICE

I hereby certify that, on this 12th day of January 2009, I served the foregoing COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON AND RENEWABLE NORTHWEST PROJECT upon the Commission by email and by sending an original and 1 copy by U.S. mail, postage prepaid, to the Commission's Salem offices. The persons whose names appear on the AR 518 service list were served by email only since it is CUB's understanding that official paper service is not required in this docket.

(W) denotes waiver of paper service

(C) denotes service of confidential material authorized

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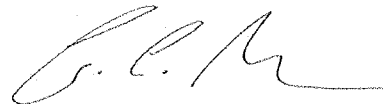
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AR 518 NOTICE OF SUBSTITUTION OF COUNSEL AND REQUEST FOR
CHANGE TO SERVICE LIST OF THE CITIZENS' UTILITY BOARD OF
OREGON

