

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

AR 518 – Phase II

In the Matter of a Rulemaking to ) RENEWABLE NORTHWEST PROJECT’S  
Implement SB 838 Relating to Renewable ) MOTION TO RECONSIDER ORDER NO. 09-  
Portfolio Standard ) 225

Pursuant to ORS 756.561(1), Renewable Northwest Project (“RNP”) moves the Commission for reconsideration of Order No. 09-225 to clarify that for the labeling requirements under OAR 860-038-0300, an electric company can only claim electricity that the electric company actually “used” during that calendar year. When an electric company (1) uses an unbundled REC; or (2) uses a REC in a compliance year that is different from the calendar year in which the electricity for which the certificate was issued was generated (banked RECs and certain bundled RECs), the electric company cannot also claim in the compliance year that it “used” the electricity for which these certificates were issued for the labeling requirements under OAR 860-038-0300.

RNP does not agree with the decision that the Commission reached in Order 09-225 for all the reasons stated in its prior submissions filed in this proceeding. This motion to reconsider, however, is directed at clarifying the order.

In 1999, the Oregon legislature passed Direct Access Regulation statutes, ORS 757.600 *et seq.* These statutes, among other things, required the Commission to adopt rules that addressed “consumer protection” and at a minimum, required marketing information to “contain provisions for the disclosure of price, power source and environmental impact.” ORS 757.659(3). To that end, the Commission adopted OAR 860-038-0300, which provides that an electric company must, for each service and product it offers, “provide price, power source, and environmental impact information to all residential consumers at least quarterly.”

RNP has attached copies of the “labels” that PGE and PacifiCorp currently have available on their websites. (They are out of date.)

Separately, in 2007, the Oregon legislature adopted Senate Bill 838, ORS ch. 469A, which, among other things, subjects electric utilities and ESSs to Renewable Portfolio Standards (RPS) and requires them to make annual compliance reports for the purpose of detailing compliance, or failure to comply, with the renewable portfolio standard applicable in the compliance year. ORS 469A.050, 469A.170(1). For purposes of complying with the RPS applicable in a compliance year, the RECs an electric utility and ESS can use include (1) a banked REC; (2) an unbundled REC; and (3) a bundled REC issued or acquired by the electric utility or ESS on or before March 31 in the calendar year following the compliance year. ORS 469A.070(1)(b), (2).

In the first two cases, REC is “detached” from the electricity for which the REC was issued.<sup>1</sup> In the first and third cases, the REC is being used for compliance purposes in a compliance year that is different from the calendar year in which the electricity for which the certificate was issued was generated. In the case of the banked REC, “for the purpose of compliance with a renewable portfolio standard in a subsequent year,” the REC is carried forward from the calendar year in which the electricity for which the certificate was issued was generated. ORS 469A.005(1). In the case of an unbundled REC, the REC is acquired by an electric utility or ESS “without acquiring the electricity for which the certificate was issued.” ORS 469A.005(12). In the case of a bundled REC issued or acquired by the electric utility or

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<sup>1</sup> Thomas Reed Powell is quoted as saying:

“If you think you can think about something which is attached to something else without thinking about what it is attached to, then you have what is called a legal mind.”

Arnold, *Criminal Attempts--The Rise and Fall of an Abstraction*, 40 Yale LJ 53, 58 (1930).

ESS on or before March 31 in the calendar year following the compliance year, the electricity for which the certificate is issued is generated in the first three months of the calendar year following the compliance year for which the REC is used. In all three cases the generated energy originally associated with the RECs did not serve utility customers during the compliance year and should therefore not appear in utility source disclosure reports in that (compliance) year.

As RNP understands Order No. 09-225, the Commission treated the Direct Access Regulation legislation and the Renewable Portfolio Standard legislation as being separate statutory schemes and that “using” renewable energy (qualifying electricity) in the calendar year in which it was generated for purposes of Direct Access Regulation disclosure should not preclude use of the REC that was issued for that electricity for purposes of compliance with a renewable portfolio standard in a different year.

RNP is not asking the Commission to reconsider that determination. Rather, RNP is asking the Commission to clarify that for purposes of Direct Access Regulation disclosure, an electric company can only claim renewable energy in the calendar year in which the electricity is generated and used. An electric company, which uses a REC that was issued for electricity that was generated in a calendar year that is different from the compliance year, cannot also claim that electricity for purposes of Direct Access Regulation disclosure in the same (compliance) year the REC was used for compliance purposes.

The following examples illustrate what RNP is talking about.

Example 1: Suppose in 2010, an electric utility generates 100 MWh of renewable energy (qualifying electricity), but that the electric utility does not need to use the REC for RPS compliance in 2010. The electric utility banks the REC and uses it for RPS compliance in 2012. For the labeling requirements under OAR 860-038-0300, the electric company

can only claim that it used the renewable energy in 2010, the year it generated and used the renewable energy, not 2012.

Example 2: Suppose in 2010, an electric utility acquires an unbundled REC for 100 MWh of renewable (qualifying) electricity, and uses the REC for RPS compliance in 2010. For the labeling requirements under OAR 860-038-0300, the electric company cannot claim that it used the renewable electricity for which the certificate was issued. The company never used the renewable energy for which the certificate was issued.

Example 3: Suppose in February 2011, an electric utility generates 100 MWh of renewable energy (qualifying electricity), but that the electric utility uses the REC for RPS compliance in 2010. For the labeling requirements under OAR 860-038-0300, the electric company can only claim that it used the renewable energy in 2011, the year it generated and used the energy, not 2010.

If the Direct Access Regulation legislation and the Renewable Portfolio Standards legislation and the disclosure/reporting obligations are going to be treated as separate for purposes of the Renewable Portfolio Standards legislation, they should also be separate for purposes of the Direct Access Regulation legislation.

For the foregoing reasons, the motion should be allowed.

DATED this 14th day of August, 2009.

ESLER, STEPHENS & BUCKLEY

By:           /s/ John W. Stephens            
John W. Stephens  
Of Attorneys for Renewable Northwest  
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### Residential

- Customer News
- Products & Services
  - Power Options
    - Basic Service
    - Time of Use
    - Green Source
    - Clean Wind
    - Habitat Support
    - Generate Your Own Power
  - Renewable Power
  - Surge Protection
  - Outdoor Area Lighting
  - Earth Advantage Homes
- Energy Savings

### Basic Service

**Basic Service is the way you have traditionally paid for electricity.**



Rates are based directly on the costs PGE incurs in providing electric service. You will continue on Basic Service automatically unless you select another option.

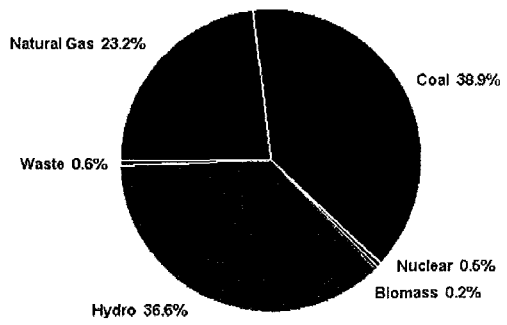
Your electricity price equals your actual usage billed at the Basic Service rate.

These energy charges do not reflect your total bill, which includes other charges such as basic charge, distribution and supplemental adjustments.

Prices cannot be changed without PUC approval. There is no minimum length of participation.

You do not have to do anything to remain on Basic Service. To choose Time of Use pricing or a renewable power option, fill out our [online enrollment form](#).

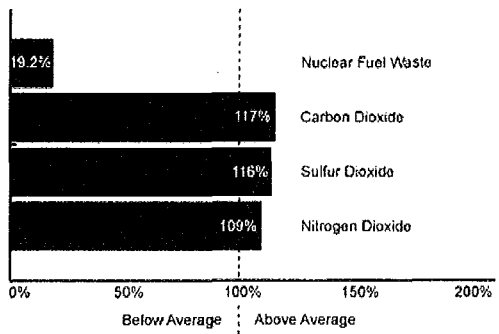
#### PGE power supply mix



Your supplier has bought or plans to buy power or unique claims on the electricity produced from these types of power plants. The portion supplied by PGE is based on recent utility production and purchases. (May not add up to 100 percent due to rounding.) Figures represent 2007 data.

The 2007 Supply Mix is adjusted to remove 130,020 megawatt hours of wind generation where the environmental attributes ("green tags" or "Tradeable Renewable Credits") were sold. The Tradeable Renewable Credits' megawatt hours were transferred to the remaining supply mix for the chart. PGE may also bank Tradeable Renewable Credits for future application toward meeting Oregon's Renewable Portfolio Standard. Tradeable Renewable Credits that are sold may result in lower electric bills or additional renewable generation for our customers.

#### Environmental impact comparison



This Oregon Department of Energy chart compares pollutants per kilowatt-hour in the PGE Basic Service power mix with that of other

- Account Summary
- Pay Your Bill
- Start, Stop or Move
- View Your Bill
- Go Paperless
- Update Your Info

#### No worries with Auto Pay

Sign up for automatic monthly payment and never fret about paying your bill on time.

#### Save paper, save time

Sign up for PGE's paperless billing. No paper. No stamps. No hassle.

Northwest utilities.

**Nuclear fuel wastes** contain the most radioactive and long-lived waste formed during operation of nuclear power plants. These wastes are stored at nuclear power reactor sites. The United States has no permanent disposal site for these wastes.

CSWeb Version: 4.0.0 Server:  
WPSAM

**Carbon dioxide** is a major contributor to global climate change. Among the likely impacts for Oregon are less mountain snow pack and less water available in summer, higher sea levels, and threats to forests, crops, and fish and wildlife habitat. Coal and natural gas are the main sources of carbon dioxide from power generation.

**Nitrogen oxide** and **sulfur dioxide** are air pollutants that affect human health, plants, fish and wildlife. Nitrogen oxides contribute to smog. Coal is the main source of these pollutants from power generation. Natural gas plants produce nitrogen oxides.

Some **hydropower dams** contribute to the decline of salmon and other fish and wildlife populations.

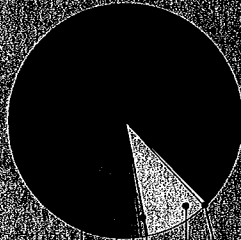
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### Cost comparison

#### Basic Service

##### Monthly electricity usage

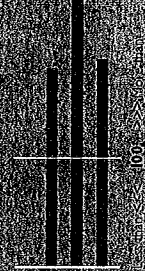
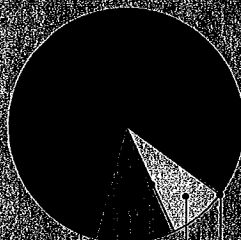
0-500 kWh @ 3.45¢/kwh	\$1.73	\$1.73	\$1.73
501-1,000 kWh @ 4.10¢/kwh	\$2.05	\$2.05	\$2.05
1,001+ kWh @ 5.08¢/kwh	\$5.08	\$5.08	\$5.08
<b>Energy cost:</b>	<b>\$8.64</b>	<b>\$17.27</b>	<b>\$88.62</b>
No additional option charges			
<b>Adjusted energy cost:</b>	<b>\$8.64</b>	<b>\$17.27</b>	<b>\$37.80</b>



#### Blue Sky Block

##### Monthly electricity usage

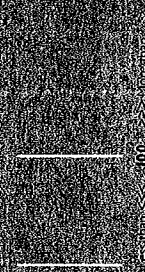
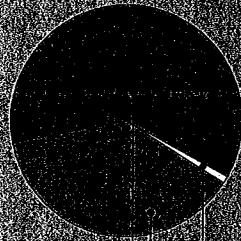
0-500 kWh @ 3.45¢/kwh	\$1.73	\$1.73	\$1.73
501-1,000 kWh @ 4.10¢/kwh	\$2.05	\$2.05	\$2.05
1,001+ kWh @ 5.08¢/kwh	\$5.08	\$5.08	\$5.08
<b>Energy cost:</b>	<b>\$8.64</b>	<b>\$17.27</b>	<b>\$88.62</b>
Additional option charges: \$1.95 per 100kwh increment (1 block)	\$1.95	\$1.95	\$1.95
<b>Adjusted energy cost:</b>	<b>\$10.59</b>	<b>\$19.22</b>	<b>\$90.57</b>



#### Blue Sky Usage

##### Monthly electricity usage

0-500 kWh @ 3.45¢/kwh	\$1.73	\$1.73	\$1.73
501-1,000 kWh @ 4.10¢/kwh	\$2.05	\$2.05	\$2.05
1,001+ kWh @ 5.08¢/kwh	\$5.08	\$5.08	\$5.08
<b>Energy cost:</b>	<b>\$10.59</b>	<b>\$21.17</b>	<b>\$104.22</b>
No additional option charges			
<b>Adjusted energy cost:</b>	<b>\$10.59</b>	<b>\$21.17</b>	<b>\$104.22</b>



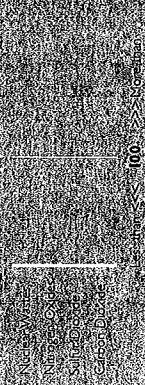
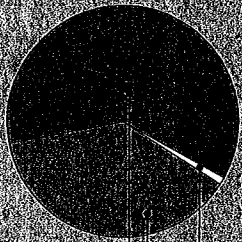
### Supply mix

### Environmental impact

## Blue Sky Habitat

### Monthly electricity usage

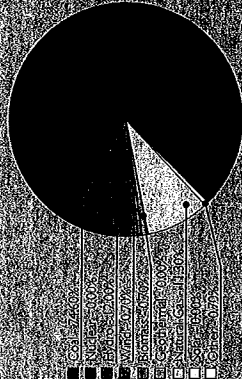
Usage	Option 1	Option 2	Option 3
0-500 kWh @ 423¢/kwh per kWh	\$1,059	\$2,117	\$2,117
501-1,000 kWh @ 488¢/kwh per kWh	-	\$7,443	\$7,443
1,001+ kWh @ 586¢/kwh per kWh	-	-	\$58,622
<b>Energy cost:</b>	<b>\$1,059</b>	<b>\$2,117</b>	<b>\$45,602</b>
Additional option charges: \$250 donation to The Nature Conservancy	\$250	\$250	\$250
<b>Adjusted energy cost:</b>	<b>\$1,309</b>	<b>\$2,367</b>	<b>\$48,102</b>



## Time of Use

### Monthly electricity usage

Usage	Option 1	Option 2	Option 3
0-500 kWh On-Peak @ 9.57¢/kwh per kWh	\$8.54	\$17.08	\$17.08
Off-Peak @ 2.32¢/kwh per kWh	-	-	\$20.34
501-1,000 kWh On-Peak @ 10.23¢/kwh per kWh	-	-	\$20.34
Off-Peak @ 2.98¢/kwh per kWh	-	-	\$50.44
1,001+ kWh On-Peak @ 11.26¢/kwh per kWh	-	-	\$87.97
Off-Peak @ 3.95¢/kwh per kWh	-	-	\$1.50
<b>Energy cost:</b>	<b>\$8.54</b>	<b>\$17.08</b>	<b>\$37.42</b>
Additional option charges: \$150 meter fee	\$150	\$150	\$150
<b>Adjusted energy cost:</b>	<b>\$10.04</b>	<b>\$18.58</b>	<b>\$38.92</b>



# Comparing your Power Options

Electricity can be generated in a number of ways. This quarterly brochure helps you compare the prices, fuel sources and environmental impact of electricity options available to you. We hope you find this information helpful.

For more information about your options or to enroll, please visit our website at [www.pacificpower.net](http://www.pacificpower.net) or call us at 1-800-369-5717.





## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **RENEWABLE NORTHWEST PROJECT'S MOTION TO RECONSIDER ORDER NO. 09-225** on the following persons on August 14, 2009, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to them at their last-known address shown below and deposited in the post office on said day at Portland, Oregon:

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DATED this 14<sup>th</sup> day of August, 2009.

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