

December 12, 2008

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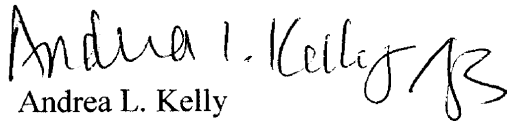
Oregon Public Utility Commission  
550 Capitol Street NE, Suite 215  
Salem, OR 97310-2551

RE: **UM 1394** – Comments of PacifiCorp to Joint Issues List

PacifiCorp, d.b.a. Pacific Power, hereby submits for filing its Comments on the Joint Issues List in the above-referenced matter.

Inquiries may be directed to Joelle Steward, Regulatory Manager, at (503) 813-5542.

Very truly yours,



Andrea L. Kelly  
Vice President, Regulation

Enclosure

Cc: **UM 1394** Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1394**

In the Matter of the  
  
PUBLIC UTILITY COMMISSION OF  
OREGON

**COMMENTS OF PACIFICORP TO  
JOINT ISSUES LIST**

Open an investigation into electric companies providing Qualified Reporting Entity services for certification of renewable energy certificates by the Western Renewable Energy Generation Information System.

1           PacifiCorp d/b/a Pacific Power (“PacifiCorp” or “Company”) hereby submits  
2    comments to Oregon Public Utility Commission (“Commission”) staff’s revised joint  
3    issues list, dated December 1, 2008 (“Joint Issues List”).

4           **I.       INTRODUCTION AND BACKGROUND**

5           This investigation is intended to explore the potential of electric companies  
6    providing Western Regional Generation Information System (“WREGIS”) Qualified  
7    Reporting Entity (“QRE”) services to generators located within their respective  
8    Balancing Authority Areas. On November 6, 2008, PacifiCorp submitted opening  
9    comments (“Opening Comments”) to the seven issues outlined in the staff report from the  
10   October 7, 2008 public meeting (“Staff Report”). The Opening Comments are  
11   incorporated herein by reference. PacifiCorp now provides the following comments to  
12   the Joint Issues List.

1           **II.       COMMENTS IN RESPONSE TO JOINT ISSUES LIST**

2   **1.       Does the Commission have authority to require a public utility to provide**  
3   **QRE service to all generators over 350 kilowatts (kW) upon request if:**

4           **a.       The generator is located in the public utility’s Oregon service**  
5           **territory and is interconnected to the public utility’s distribution or**  
6           **transmission system under a valid interconnection agreement?**

7           In its Opening Comments, PacifiCorp asserted that the Commission lacked  
8   authority to require electric companies such as PacifiCorp to provide QRE service. *See*  
9   Opening Comments at p. 10. PacifiCorp stands by this assertion. The Commission has  
10   jurisdiction over “public utilities.” *See* ORS § 756.040(2). Moreover, PacifiCorp is  
11   regulated by the Commission in its function as a “public utility.” The fact that the  
12   Commission has jurisdiction over PacifiCorp as a “public utility,” however, does not vest  
13   it with authority to require PacifiCorp to provide a competitive service outside the scope  
14   of its primary obligation as a “public utility”— providing safe, reliable and adequate  
15   electrical service to its customers. *See* ORS § 757.020. As noted in the Opening  
16   Comments, PacifiCorp has been unable to find any state or federal statute, administrative  
17   rule or regulation that provides the Commission with authority to require electric  
18   companies to provide QRE service. *See* Opening Comments at p. 9.

19           The answer to the question of whether a generator is located within or without a  
20   public utility’s service territory does not inform the underlying issue of Commission’s  
21   authority to require the provision of QRE service, even if it may relate to the question of  
22   whether the Commission is asserting jurisdiction over assets that are regulated by the  
23   Federal Energy Regulatory Commission (“FERC”). By statute, the Commission may  
24   grant utilities exclusive service territories for the provision of “utility service.” *See* ORS

1 § 758.435. “Utility service” is defined in relevant part as: “service provided by any plant  
2 or facility for the distribution of electricity to users . . .” See ORS §§ 758.400(3).

3 With the exclusive right to provide “utility service” to customers within a certain  
4 area, utilities are in-turn obligated to provide safe, reliable and adequate electrical service  
5 to such customers at just and reasonable rates. See ORS § 757.020. The provision of  
6 QRE service has no relation to the “distribution of electricity to users,” and is not a  
7 “utility service.” In other words, having an allocated service territory does not trigger an  
8 obligation to provide a service unrelated to the provision of utility service.

9 Moreover, PacifiCorp has made no request, nor does it desire to be the exclusive  
10 provider of QRE services for any area. Thus, whether a generator is located within or  
11 without a utility’s allocated service territory has no bearing on the Commission’s  
12 authority to require a utility to provide QRE service. For the same reasons discussed  
13 above, the existence or absence of an interconnection agreement with a generator  
14 likewise has no relation to the Commission’s authority to require the provision of QRE  
15 service.

16 **b. The generator is located in Oregon and the public utility serves as its**  
17 **Balancing Authority, but the generator is not located in the public**  
18 **utility’s allocated service territory?**

19 The answer to this question also has no bearing on the underlying issue of the  
20 Commission’s authority to require utilities to provide QRE service. The term “Balancing  
21 Authority”<sup>1</sup> is a term of art used in the context of a transmission provider’s responsibility

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<sup>1</sup> The term “Balancing Authority” is defined by the Western Electricity Coordinating Council (“WECC”) as “the responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports the frequency in real time.” “Balancing Authority Area” is further defined as “[t]he collection of generation, transmission, and loads within the metered boundaries of the Balancing Authority. The Balancing Authority maintains load-resource balance within this area. See Glossary of WECC Terms and Acronyms at <http://www.wecc.biz/wrap.php?glossary/index.php>

1 to balance load and resources on its transmission system. The obligations and  
2 responsibilities associated with a utility’s role as a Balancing Authority (balancing load  
3 and resources) are related to reliability standards promulgated to ensure the reliability of  
4 the nation’s bulk electric transmission system.<sup>2</sup> The enforcement of these standards falls  
5 within the FERC, as delegated to certain regional electric reliability organizations,  
6 including the Western Electricity Coordinating Council (“WECC”).

7 A utility’s obligations as a Balancing Authority have no relation to the provision  
8 of QRE service. Rather, it is only a preference of WREGIS and Commission staff that  
9 Balancing Authorities provide QRE service. *See* Opening Comments at p.6. This  
10 preference is based partially on the fact that Balancing Authorities may already be  
11 collecting some of the data from certain generators necessary to provide QRE services as  
12 part of their responsibility to balance resources with load. PacifiCorp does not dispute  
13 the reasons for this preference, but wishes to clarify that its obligations as a Balancing  
14 Authority do not include the obligation to provide QRE service.

15 As discussed above, as the Commission does not have authority to require  
16 Balancing Authorities to provide QRE services, the location of a generator within or  
17 without a utility’s service territory (or the state of Oregon for that matter), would not  
18 change the conclusion that the Commission has no authority to require a utility to provide  
19 QRE service.

20 **c. The generator is located in the public utility’s allocated service**  
21 **territory or control area, or both, but is not interconnected to the**  
22 **public utility’s distribution or transmission system?**

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<sup>2</sup> The Federal Energy Regulatory Commission (“FERC”) has delegated authority to the North American Electric Reliability Corporation (“NERC”) to promulgate and enforce certain standards related to the reliability of the nation’s bulk electric transmission system. NERC has in turn, with the approval of FERC, delegated certain of those rights and responsibilities to WECC.

1 For the reasons discussed above, PacifiCorp does not believe that a generator's  
2 interconnection status has bearing on the fundamental question of whether the  
3 Commission has authority to require a utility to provide QRE service.

4 **2. To the extent the Commission has authority to require the public utilities to**  
5 **provide QRE service, should the service be provided through a Commission-**  
6 **approved rate schedule?**

7 PacifiCorp has no comment to this issue.

8 **3. If QRE service is provided through a Commission-approved rate schedule,**  
9 **what types of terms and conditions should be specified:**

10 **a. In the rate schedule?**

11 As shown on Attachment A of Opening Comments, the tariff schedule should  
12 specify the following: where the service is available, to whom the service is applicable,  
13 communication and procedure information for executing a contract and identification of  
14 the costs.

15 **b. In the QRE contract between the public utility and generator?**

16 PacifiCorp believes a contract between utilities and generators for QRE services  
17 should generally include following:

- 18 • Specified term and rights of termination
- 19 • Duties of the parties
- 20 • Meter and interconnection requirements
- 21 • Cost
- 22 • Reference to, and incorporation of applicable WREGIS documents
- 23 • Mechanics of data gathering and QRE reporting
- 24 • Events of default and remedies
- 25 • Force majeure
- 26 • Indemnification, hold harmless, waiver and limitation of liability
- 27 provisions
- 28 • Dispute resolution

1 Notwithstanding the foregoing, PacifiCorp plans to submit a draft QRE  
2 Agreement for consideration on January 7, 2009, which will set forth the terms and  
3 conditions for the provision of QRE service in more detail.

4 **4. Regardless of whether the Commission possesses the authority to require the**  
5 **public utilities to provide QRE service, are the public utilities willing to**  
6 **voluntarily provide such service? If so, to whom and under what conditions?**  
7 **If utilities voluntarily provide QRE service and associated costs are allowed**  
8 **in rates, what types of terms and conditions should be specified in the QRE**  
9 **contract between the public utility and the generator?**

10 PacifiCorp previously indicated in its Opening Comments that it is willing to  
11 explore the possibility of voluntarily providing QRE subject to certain conditions. *See*  
12 *Opening Comments* at p. 10. These conditions would include appropriate cost recovery  
13 and the execution of an agreement between the respective generator and PacifiCorp as a  
14 condition of QRE service. PacifiCorp anticipates that it would voluntarily offer QRE  
15 service to generators with a nameplate capacity over 360 kW that are located within  
16 PacifiCorp's Oregon allocated territory and for which PacifiCorp acts as the Balancing  
17 Authority. The general terms and conditions that would be contained in a QRE contract  
18 are set forth in PacifiCorp's comments to issue 3b above.

19 **5. Would the following public utility activities be prohibited as discriminatory**  
20 **under relevant law or otherwise be prohibited by any other law:**

21 **a. Acting as a QRE for owned or contracted facilities from which the**  
22 **utility is receiving renewable energy certificates (RECs), but not**  
23 **offering QRE service for other generators interconnected to the utility**  
24 **or for which the utility is a Balancing Authority ("Third Party**  
25 **Generators")**

26 *See* Opening Comments at pp. 6-8.

27 **b. Charging Third Party Generators for QRE service if the cost of**  
28 **providing such service for owned or contracted facilities from which**  
29 **the utility is receiving RECs is included in retail rates**

1           *See* Opening Comments at pp. 6-8.

2           **c.       Charging Third Party Generators a different rate for QRE service**  
3                   **than the internal cost the utility incurs for owned or contracted**  
4                   **facilities from which the utility is receiving RECs.**

5           *See* Opening Comments at pp. 6-8.

6           **d.       Charging Third Party Generators an amount for QRE service in**  
7                   **excess of an amount charged to contracted facilities from which the**  
8                   **utility is receiving RECs.**

9           *See* Opening Comments at pp. 6-8.

10          **6.       What are the requirements to be a QRE under the Western Renewable**  
11                   **Energy Generation System?**

12           *See* WREGIS Interface Control Document for Qualified Reporting Entities  
13           (“QRE-ICD”), which can be viewed at [www.wregis.org](http://www.wregis.org).

14          **7.       Can third parties compete effectively with public utilities to provide QRE**  
15                   **service for generators over 360 kW?**

16           The Company is aware that certain entities are seeking to engage in the QRE  
17           business. *See* Opening Comments at p. 3. Whether third parties can compete effectively  
18           to provide QRE services depends to a large extent on the outcome of proceedings such as  
19           this and those in other states. To the extent such proceedings result in pricing being  
20           offered by regulated entities that does not reflect to true cost to the provider, third parties  
21           would be less able to compete effectively.

22          **8.       What are the estimated costs for providing QRE service to Third Party**  
23                   **Generators and what is the basis for these costs?**

24           *See* Opening Comments at pp. 10-12.

25          **9.       Assuming costs associated with QRE service are allowed in retail rates,**  
26                   **should the public utilities charge generators the fully allocated cost or the**  
27                   **incremental cost for QRE services?**



1 PacifiCorp proposes to charge generators the Company's cost of performing QRE  
2 service.

3 **10. Would charges for either fully allocated or incremental costs of QRE service**  
4 **be prohibitively expensive for generators?**

5 *See Opening Comments at p. 13.*

6 **11. Does the Commission have authority to order that QRE services provided by**  
7 **Third Party Generators be subsidized by ratepayers on a pilot program**  
8 **basis? If so, what are the bases and standards for such authority? Should**  
9 **QRE services to Third Party Generators be subsidized?**

10 PacifiCorp has no comment to this issue.

11 **12. Should public utilities provide a service comprised of reporting generation**  
12 **data that the utility has to a third party upon the generator's request, thus**  
13 **giving the generator the additional option of choosing an alternative QRE?**  
14 **If so, what are the costs of providing such a service, and what are:**

15 Assuming that a generator had a revenue quality meter and the necessary  
16 communications equipment, and PacifiCorp has permission to interrogate the meter,  
17 PacifiCorp is willing to explore the option of voluntarily providing a service in which it  
18 interrogated a generator's meter and provided such data to a third party QRE service  
19 provider. Essentially, PacifiCorp would be performing all of the downstream meter  
20 interrogation and data collection work, while allowing a third party to perform all of the  
21 upstream Task/Activities identified in Table 1 of the Opening Comments.

22 As noted in the Opening Comments, certain non-utility entities are currently  
23 offering QRE service and the potential for other entities providing such service exists.

24 *See Opening Comments at pp. 8-9.* Moreover, PacifiCorp has no, nor desires to have a  
25 monopoly on the provision of QRE service within its allocated service territory,  
26 Balancing Authority Area, or otherwise.

1           The provision of such a service, however, would be conditioned on (1)  
2 appropriate cost recovery for the service; and (2) the execution of an agreement between  
3 and among the prospective third-party QRE providers, the generator and the utility. The  
4 cost of providing such a service is estimated to be \$50 per month, per generator, with a  
5 one time set up fee that has not yet been determined. Any additional data requests by a  
6 third party beyond the basic monthly provision per generator would be charged at the  
7 service rate of \$50 per hour.

8           **a.     The bases for those costs?**

9           The estimated costs (\$50 per generator, per month) are based on one hour spent  
10 for upstream work per generator, per month, which includes meter interrogation,  
11 diagnostics, edits and checks.

12           **b.     The liabilities of providing meter data to an alternative QRE?**

13           As discussed below regarding the provision of QRE service, a utility would be  
14 generally exposed to claims loss or damage resulting from delays, errors, omissions, or  
15 other inaccuracies in providing meter data to alternative QREs. For this reason,  
16 PacifiCorp would only be willing to provide such data pursuant to agreements with the  
17 generator and the third party QRE provider containing appropriate waiver and  
18 indemnification provisions.

19           **c.     The responsibilities of providing meter data to an alternative QRE?**  
20           **What if the generator wants corrections/adjustments?**

21           Assuming the generator has the necessary revenue quality meter and  
22 communications equipment in place, the utility would be responsible for interrogating the  
23 meter, diagnostics, edits and checks. This data would then be transmitted on a monthly  
24 basis to the third party QRE provider. The meter data would be provided by the utility to  
25 the third-party QRE provider as-is, with no warranties. As discussed above, the utility's

1 only role would be to interrogate the meter. Any corrections or adjustments to the data  
2 would be handled between the generator and the third party QRE provider.

3 **13. Under what conditions might additional metering be needed to provide QRE**  
4 **service for generators, and who should bear the cost?**

5 WREGIS qualification requires revenue quality metering (MV90) for  
6 participation. The cost of installing, operating and maintaining the meter is the  
7 responsibility of the generator.

8 **14. Does the Federal Energy Regulatory Commission (FERC) have jurisdiction**  
9 **over Qualified Reporting Entity (QRE) service provided public utilities?**  
10 **Does the answer depend on the design of this service and which function of**  
11 **the utility provides the service?**

12 *See Opening Comments at pp. 5-6.*

13 **15. What are the responsibilities and liabilities of the utility providing QRE**  
14 **service?**

15 The specific responsibilities associated with providing QRE service are set forth  
16 in pages 10-12 of the Opening Comments and the QRE-ICD. In general, QREs are  
17 required to report generation data at a sufficiently detailed level as to identify the amount  
18 of renewable energy generated by the generating unit. The data needs to be inherently  
19 reliable, and fully auditable. To that end, the data needs to be of financial settlement  
20 quality data from revenue quality meters. In addition to reporting of data, QREs are  
21 required to provide WREGIS with regular internal and external audit and verification  
22 reports.


23 It is impossible to provide an exhaustive list of all potential liabilities that a utility  
24 might be exposed to in performance of its duties as a QRE. With that being said, a QRE  
25 would be generally exposed to claims loss or damage resulting from delays, errors,  
26 omissions, or other inaccuracies in the reporting of generation data to WREGIS. Such

1 claims could be brought by multiple potential parties, including, generators, renewable  
2 portfolio standard administrators and/or parties to REC purchase agreements.

3 **III. CONCLUSION**

4 PacifiCorp appreciates the opportunity to provide opening comments in this  
5 proceeding.

DATED: December 12, 2008.



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Jordan A. White  
Legal Counsel  
Pacific Power  
PacifiCorp

## CERTIFICATE OF SERVICE

I hereby certify that on this 12<sup>th</sup> day of December, 2008, I caused to be served, via E-Mail and US Mail (to those parties who have not waived paper service), a true and correct copy of the foregoing document on the following named person(s) at his or her last-known address(es) indicated below.

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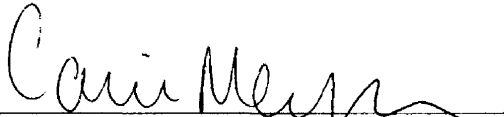
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