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November 6, 2008

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Public Utility Commission of Oregon
Administrative Hearing Division

RE: Docket No. UM 1394 – PacifiCorp’s Opening Comments

PacifiCorp, d.b.a. Pacific Power, hereby submits for filing its Opening Comments in the above-referenced matter. Attachment A is a draft tariff, submitted pursuant to the Commission direction at the October 7, 2008 public meeting.

It is respectfully requested that staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By Fax: (503) 813-6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 800
Portland, OR 97232

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

DOCKETED

1 Wyoming). PacifiCorp provides service to customers within its allocated Oregon service
2 territory through its operating division, Pacific Power (“Oregon Service Territory”).
3 PacifiCorp also has a regulated transmission function that is functionally separated from its
4 merchant function. As part of its transmission function, PacifiCorp acts as the balancing
5 authority for two separate Balancing Authority Areas: PacifiCorp East (“PACE”) and
6 PacifiCorp West (“PACW”). Much of the territory located within its Balancing Authority
7 Area (defined by metered points of receipt and metered points of delivery) is outside
8 PacifiCorp’s Oregon Service Territory. For example, PacifiCorp acts as the Balancing
9 Authority for a generator within its Balancing Authority Area that is actually located within
10 the state of Arizona. Additionally, there are points in PACW in the State of Oregon that are
11 outside PacifiCorp’s Oregon Service Territory.

12 **B. Renewable Portfolio Standard**

13 As part of the Oregon Renewable Energy Act of 2007 (“SB 838”), the state of Oregon
14 established a renewable portfolio standard (“RPS”) for electric utilities, now codified in ORS
15 Chapter 469A (the “RPS Statute”). Pursuant to the RPS Statute, large utilities such as
16 PacifiCorp must ensure that a percentage of the electricity sold to their retail customers
17 within the state be derived from eligible renewable energy resources according to a
18 prescribed schedule. *See* ORS § 469A.052.

19 Eligible renewable resources include electricity generated from solar, wind,
20 hydropower, ocean thermal, wave, and tidal power, geothermal, hydrogen derived from
21 renewable sources, and biomass, including biogas. *See* ORS § 469A.025. These resources
22 must be located within Western Electricity Coordinating Council (“WECC”) territory or be
23 designated environmentally preferable by the Bonneville Power Administration (“BPA”).

1 See ORS § 469A.135.

2 The RPS Statute also directed the state Department of Energy (“DOE”) to establish a
3 system of renewable energy certificates (“RECs”) that can be used by electric utilities to
4 demonstrate compliance. See ORS § 469A.130. To that end, the DOE promulgated
5 Division 150, which requires utilities to track RECs through WREGIS.

6 **C. Western Renewable Energy Generation Information System**

7 WREGIS is an automated web-based renewable energy registry and tracking system
8 that receives data on renewable energy generation, creates RECs¹, registers the transfer of
9 RECs within and without the WREGIS system, allows the reporting of such transfers, and
10 enables parties to retire and otherwise engage in activities concerning these RECs. It was
11 developed by the California Energy Commission (“CEC”) and the Western Governors’
12 Association (“WGA”) in response to policies set by the California Legislature and WGA to
13 develop and implement a system tracking renewable energy generation. WREGIS covers the
14 same geographic region as WECC², is housed within WECC and is governed by a WREGIS
15 Committee, which is a Board Committee of WECC.

16 The Federal Energy Regulatory Commission (“FERC”) has delegated authority to the
17 North American Electric Reliability Corporation (“NERC”) to promulgate and enforce
18 certain standards related to the reliability of the nation’s bulk electric transmission system.
19 NERC has in turn, with the approval of FERC, delegated certain of those rights and
20 responsibilities to WECC. However, none of the rights or authorities delegated by FERC to

¹ A REC is created in increments of one megawatt hour (MWh) of reported renewable energy generation.

² WREGIS covers the same geographic territory as the Western Interconnection, which includes Alberta, British Columbia, Washington, Oregon, California, Nevada, Idaho, Utah, New Mexico, Arizona, Colorado, Wyoming, Montana, parts of Texas, South Dakota, and Nebraska and the northern portion of Baja, Mexico

1 WECC (via NERC) includes the promulgation or enforcement of RPSs. Rather, WREGIS is
2 housed with WECC solely as a matter of convenience and synergy.

3 The terms and conditions of WREGIS operation and participation are set forth in
4 the documents known as the Operating Rules and Interface Control Document. Under the
5 Operating Rules, all generators that wish to obtain recognition of their generation by
6 creation of a REC must register with WREGIS and become "Account Holders". The
7 Operating Rules further dictate that Account Holders must have their generation data
8 submitted to WREGIS by a QRE with the exception of customer-sited distributed
9 generating units (with less than or equal to 360 kWh nameplate capacity), which are
10 allowed to self-report generation data.

11 Section 10.1 of the Operating Rules notes that "Qualified Reporting Entities may
12 include balancing authorities, the interconnecting utility, scheduling coordinator,
13 independent third-party meter reader, Generator Owner, or Generator Agent, so long as
14 the Qualified Reporting Entity has a signed agreement with the WREGIS Administrator
15 and the established guidelines are met by the entity." (emphasis added)

16 PacifiCorp has registered both as an Account Holder and a QRE. Generation data
17 for registered facilities is provided to PacifiCorp's FERC functionally-separated "back
18 office,"³ which in turn acts as a QRE and reports the data to WREGIS. This arrangement
19 is necessary pursuant to WREGIS' QRE guidelines because PacifiCorp owns generating
20 units and is subject to RPSs that obligate the Company to retire RECs at some point in the
21 future. This allows PacifiCorp's reporting entity (back office) to be independent from the
22 retiring entity (merchant). PacifiCorp also acts as a QRE for certain third-party generator

³ See II.A. below for more information on this functional separation.

1 Account Holders according to the terms and conditions of power purchase agreements.
2 These arrangements are based upon the exchange of rights, benefits and obligations
3 voluntarily agreed to by the parties to such agreements.

4 II. COMMENTS IN RESPONSE TO STAFF'S LIST OF ISSUES

5 The Staff Report identified seven issues to be addressed in this proceeding.
6 PacifiCorp provides the following opening comments to those issues.

7 1. Does the Federal Energy Regulatory Commission (FERC) have jurisdiction over 8 QRE service provided by electric service companies? Does the answer depend on 9 the design of this service and which function of the utility provides the service?

10 The short answer to the two issues presented above is no. The FERC is an
11 independent federal agency that regulates the interstate transmission of electricity, natural
12 gas, and oil. As such, it takes no position on WREGIS, QREs, or state RPSs. Moreover,
13 the federal government has yet to establish a national RPS or assert any jurisdiction over
14 state RPS programs in general. As noted above, WREGIS is a private non-profit entity
15 created with funding from CEC and WGA in response to policies set by the California
16 Legislature to develop and implement a system tracking renewable energy generation.

17 PacifiCorp's transmission and merchant functions are functionally separated in
18 order to comply with FERC standards of conduct regarding open, non-discriminatory
19 access to the Company's transmission system. In general, those standards prohibit
20 transmission providers from disclosing non-public information about its transmission
21 system to its merchant. To avoid non-public transmission information from passing to its
22 merchant, PacifiCorp's shared back office acts as a necessary intermediary.

23 There would be no violation of FERC standards of conduct if an entity with the
24 necessary generation data (such as PacifiCorp transmission) reported such data from its

1 merchant directly to WREGIS. PacifiCorp has chosen to have this function performed by
2 its back office to adhere to WREGIS' QRE guidelines, not because of any FERC
3 regulation.

4 WREGIS is attracted to the idea of having balancing authorities (such as
5 PacifiCorp) perform QRE services because they typically have built-in functional
6 separation to comply with FERC standards of conduct. This type of separation adds
7 integrity to the data because it avoids the inherent conflict of interest associated with
8 generators reporting their own data. Although the data integrity that may be offered by an
9 entity that has systems sufficiently sophisticated to operate a balancing authority may be
10 attractive, there is no prohibition (from FERC, or otherwise) against a generator
11 contracting with another third-party (whether or not a balancing authority) to provide QRE
12 services. In fact, there are third parties that are not balancing authorities that hold
13 themselves out as vendors of QRE services. WREGIS itself has no authority to require
14 balancing authorities to provide QRE. Rather, it is only a preference of WREGIS.

15 **2. Would it be discriminatory for a utility to charge for QRE service for**
16 **unaffiliated entities, but not charge itself for service for owned or contracted**
17 **facilities?**

18 *a. Discrimination.*

19 The term "discriminatory" is typically used in the context of utility regulation to
20 describe the prohibition against charging customers within a monopolized certificated
21 service territory for rates or services that are different from the rates or amounts
22 prescribed in a utility's schedules or tariffs. *See* ORS §757.310. The Company currently
23 performs QRE services for its own generation assets and certain non-affiliate parties with
24 which it has contracted to purchase RECs and energy. Because PacifiCorp does not offer

1 QRE service as a tariffed service to customers within an allocated service territory, the
2 Company is not required to provide such services at published rates. If PacifiCorp chose,
3 or was required by the Commission, to offer QRE service pursuant to a tariff and
4 accompanying price schedule, it would charge rates consistent with the same.

5 It is difficult to understand, however, why the provision of QRE service by
6 PacifiCorp for its own assets (the cost and benefits of which are ultimately borne by rate
7 payers) would be considered discriminatory. It is equally difficult to understand why the
8 provision of QRE services to third-parties as a condition of arms-length negotiated power
9 purchase contracts would be considered discriminatory.

10 It is not uncommon (or illegal) for utilities to bargain for the exchange of non-
11 tariffed goods and services as consideration within the context of commercial contracts.
12 The most common example can be found in leases of property for the construction, use and
13 maintenance of power lines. In those contracts, utilities often perform maintenance of
14 underlying fee-property in partial consideration for use of the property. By analogy,
15 would it be discriminatory for PacifiCorp to provide this service in partial consideration
16 for leasing property if it did not offer the same service for free to all other property
17 owners?

18 *b. "Unaffiliated" Entities*

19 Although not directly addressed, the use of term "unaffiliated" in the Staff Report
20 issues list deserves consideration. The term "affiliate" is typically used in the context of
21 utility regulation to describe an entity that is under common ownership and/or control of
22 the regulated utility. States promulgate rules and regulations to prevent regulated utility
23 rate payers from subsidizing the shareholders of the utility's non-regulated affiliates. *See*

1 ORS §757.495. To achieve this objective, utilities are typically required to provide
2 services or goods to affiliates at the higher of cost or market. Conversely, utilities are
3 required to obtain services or goods from affiliates at the lower of cost or market. See
4 OAC § 860-027-0048(4).

5 The use of the term “unaffiliated” in staff’s issue introduces into this investigation
6 an apparent concern regarding customer protection that is actually not present. If
7 PacifiCorp were at some point to provide QRE services to an affiliate, it would be required
8 to comply with all applicable rules and regulations associated with affiliate transactions.
9 The fact that PacifiCorp provides QRE services for its own generation assets and to parties
10 from whom it purchases RECs and energy does not present a risk of subsidizing affiliate
11 shareholders at the expense of rate payers.

12 **3. Is QRE service, except for very small generators, a competitive service?**

13 PacifiCorp has not conducted an exhaustive study of entities that provide or may
14 provide QRE services. PacifiCorp has, however, encountered two entities currently
15 providing such service: Fat Spaniel and Viasyn. As reported by WREGIS staff, Fat Spaniel
16 provides QRE services for very small generators and has no interest in expanding its market
17 share. Viasyn’s website (www.viasyn.com) notes that it “is a Qualified Reporting Entity
18 (QRE) with the Western Regional Electricity Generation Information System (WREGIS).”
19 The site further notes that, “[a]s a QRE, Viasyn can take responsibility for reporting your
20 renewable energy generation for creation of Renewable Energy Certificates (RECs).”

21 Notwithstanding these limited examples; PacifiCorp asserts that focus should be
22 placed on the potential, rather than the current market for QRE services. This potential is
23 underscored in WREGIS’ Control Document, which notes that QREs may include, but are

1 not limited to, balancing authorities, load serving entities, generator aggregators, meter
2 readers and independent third parties. See Control Document at 5. It is not inconceivable
3 to envision a scenario in which any or all of the previously mentioned entities would enter
4 a competitive QRE service market.

5 **4. Should electric companies be required to provide QRE service to all generators**
6 **upon request?**

7 PacifiCorp recognizes that it may be in a unique position to act as a QRE because, in
8 certain circumstances, it may already be collecting data from generators for other purposes.
9 Moreover, PacifiCorp appreciates that it may be able to add integrity to generation data it
10 provides due to functional separation between its merchant and transmission functions.
11 Notwithstanding this acknowledgment, the simple fact is that there is no state or federal
12 statute, administrative rule or regulation that requires electric companies such as PacifiCorp
13 to provide QRE service.

14 Notwithstanding this lack of authority, PacifiCorp is willing to explore the possibility
15 of voluntarily providing QRE subject to certain conditions. However, the Company believes
16 that important issues need to be addressed in a workshop setting that are beyond the scope of
17 staff's initial issues list and plans to provide additional questions to be addressed as part of
18 the joint issues list (due November 18, 2008).

19 **5. What are the estimated costs for providing QRE services to unaffiliated entities**
20 **and what are the basis for these costs?**

21 *a. Current Estimated Time to Provide QRE Services*

22 PacifiCorp currently provides QRE services to two types of generators: (1)
23 PacifiCorp's own geothermal, hydro and wind generators ("Owned Generators"); and (2)
24 third party generators from which PacifiCorp purchases energy and retains RECs

1 (“Bundled REC Generators”). PacifiCorp estimates the time spent conducting the
 2 necessary tasks and activities associated with the provision of QRE service for these two
 3 types of generators is approximately forty hours per month. These tasks (data preparation,
 4 data upload, adjustments and communications) and associated activities are performed by
 5 PacifiCorp’s back office and are generally set forth in Table 1 below.

Table 1

QRE Service Tasks/Activities
<p><u>Data Preparation</u></p> <ul style="list-style-type: none"> • Run MV90 meter reports for each individual generation plant to be reported in WREGIS. • Input MV90 monthly summary data into the generation report along with the month-end plant reads, and the metering generation database logs. • Compare the MV90 monthly hydro meter summaries to the individual month end reads from the hydro plants and month-end metering generation database log report. • Ensure all monthly data sources are in alignment for each plant in the monthly generation report. • Research any variances between these generation sources with the plant personnel and/or meter interrogators. Make corrections to reporting source if necessary. • Compare the MV90 metering for owned wind generation with metering generation database. • Collect monthly contract wind generation data and input into the WREGIS preparatory worksheet. • Input the final generation plant data from the generation report into FERC 1 report for the current year. •
<p><u>Data Upload</u></p> <ul style="list-style-type: none"> • Update the WREGIS preparatory worksheet with new monthly hydro and wind FERC 1 data. Check the reconciled load total in the WREGIS preparatory worksheet to ensure it ties back to the original FERC 1 hydro generation total for the month. • Verify that current monthly WREGIS upload file load totals tie back to the WREGIS preparatory worksheet. • Copy the current upload data into a new spreadsheet and change the format to CVS file and save the file in the WREGIS upload folder. • Log into WREGIS web site and upload the CVS upload file with current month’s generation data into the WREGIS website database. • Review in the WREGIS website the current month’s data in the Vintage screen. • While in the WREGIS website download the results of the current month’s

Vintage report into an open (or view) format and then insert a copy this data into the monthly FERC 1 workbook in a new file next to the corresponding month's WREGIS preparatory file.

- Compare the generation totals from the preparatory WREGIS spreadsheet (in the FERC 1 file) to the new spreadsheet that contains the current month's meter upload Vintage file from WREGIS website to ensure that they are in balance.

Adjustments

- Identify in the FERC 1 report any variances or adjustments to the generation that were made for previous months.
- Create adjustment upload files. Upload these adjustment files to the appropriate month in WREGIS website. After the upload is completed, download the corresponding meter vintage month file from the WREGIS website and copy it into the FERC 1 workbook as the monthly WREIGS download for confirmation back up. In the FERC 1 workbook, compare WREGIS preparatory worksheet total load and the WREGIS download (Vintage download file) total load numbers to ensure that these totals tie for the respective month of the adjustment.

Communications

- Assist Company WREGIS Administrator with meter ID and generation facility information for the registration new generation plants.
- Respond to WREGIS administrator queries regarding verification of monthly input for individual plant generation load and availability, and also work with the administrator through various issues and complications that may arise with new generation units coming online in the WREGIS system. Provide the administrator historic data demonstrating seasonal load patterns when necessary.
- Coordinate with WREGIS administrator regarding any unusual adjustments or anomalies that may have arisen in the prior or current monthly plant reporting.
- Contact the WREGIS administrator for assistance and guidance when there is a need to report any systems issues, or request help with input problems that may come up.

1 b. *Estimated Time to Provide QRE Services to Generators in which PacifiCorp*
2 *acts as the Balancing Authority*

3 The time estimate provided above accounts for QRE services PacifiCorp is
4 currently providing to Owned Generators and Bundled REC Generators. This estimate,
5 however, does not account for potential requests from other generators within PacifiCorp's
6 control area. Currently, there are approximately 60 known and existing generators within

1 PacifiCorp's control area that could potentially request QRE services. PacifiCorp has no
2 way of estimating future generation that may be constructed within PacifiCorp's control
3 area that would request QRE services.

4 Although not all of the activities outlined in table 1 above would be required to
5 provide QRE service to "unknown" generators (e.g., internal reporting), the type of tasks
6 and actions would be very similar. For example, data from new generators will need to be
7 both lineated and separated to address data upload requirements.

8 The QRE services for new generators may require additional coordination and
9 communication to prepare, extract and upload data into WREGIS. Once data is actually
10 uploaded, additional research for, and communication with WREGIS will be required to
11 satisfy any load pattern or other related data questions that may arise from WREGIS.
12 Finally, PacifiCorp anticipates additional time spent on preparing responses to WREGIS
13 and generator queries regarding verification of monthly input for individual plant
14 generation load and availability.

15 Due to the uncertainty regarding the number of potential generators requesting QRE
16 service, it is difficult to provide an estimate of the costs associated with such service.
17 Instead, the work required by PacifiCorp would be incremental based on the actual number
18 of generators requesting such service. Because PacifiCorp's back-office is currently at
19 capacity with respect to work load, the Company estimates it would need at least one full
20 time employee dedicated to the task of providing QRE services to potential generators
21 within its control area. The estimated cost for such an employee (including overheads) is
22 between \$90,000 and \$100,000.

23 Because the cost of providing QRE service would be incremental, the Company has

1 not yet determined how it would price such service. PacifiCorp suggests that the cost of
2 the necessary employee would be included as an expense for rate making purposes and
3 would off-set by any revenue received from Account Holders for the provision of QRE
4 service.

5 **6. Should the utilities charge the full cost for QRE service or would the cost be**
6 **prohibitively expensive for generators?**

7 PacifiCorp recognizes the importance of supporting WREGIS and Oregon's
8 renewable policies. PacifiCorp's primary obligation, however, is to provide safe and reliable
9 electricity to its customers at the least cost. Although PacifiCorp is sensitive to the potential
10 cost burdens to smaller generators, PacifiCorp believes that neither customers nor utilities
11 should subsidize generator costs from which benefits are not derived.

12 **7. Should the service be subsidized region wide-on a pilot program basis?**

13 As noted above, PacifiCorp is not opposed to exploring the possibility of voluntarily
14 providing QRE service to generators within its control area subject to certain conditions.
15 One condition that will require further discussion is cost recovery. The issue of whether
16 QRE service should be subsidized on a region wide basis is an intriguing concept which begs
17 additional questions. For example, which entity(ies) would be providing such a subsidy
18 (PacifiCorp shareholders, PacifiCorp customers, the state of Oregon?). If customers are
19 expected to subsidize service; which classes of customers in which states would be expected
20 to provide subsidies? Due to the multiple complex issues associated with the possibility of
21 providing this service, PacifiCorp strongly supports the open and fair vetting of all issues by
22 this investigation.

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III. DRAFT TARIFF

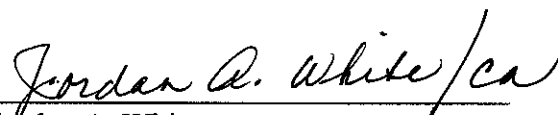
In a public meeting held October 7, 2008, the Commission adopted the recommendations contained within the Staff Report and directed each electric company in this proceeding to file a draft tariff with estimated costs for providing QRE service. Pursuant to that directive, PacifiCorp provides a draft tariff attached as Attachment A. As noted above, the Company is unable to provide definitive costs, due to the inherent uncertainties associated with providing such service. To that end, PacifiCorp provides the attached draft tariff for illustrative purposes and reserves the right to challenge and explore the question of whether a tariff is required or appropriate for the provision of QRE services. This, along with other relevant questions, will be submitted to the joint issues list by PacifiCorp as part of this proceeding.

IV. CONCLUSION

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14

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

DATED: November 6, 2008.


Jordan A. White
Legal Counsel
Pacific Power
PacifiCorp

UM 1394

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Attachment A

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UM 1394

PACIFIC POWER & LIGHT COMPANY
Qualified Reporting Entity Services

OREGON
SCHEDULE 325

DRAFT TARIFF FOR ILLUSTRATIVE PURPOSES ONLY

(N)

Purpose

To provide Qualified Reporting Entity service to eligible generators in accordance with the Operating Rules for the Western Renewable Energy Generation Information System (WREGIS).

Available

In all territory served by the Company in the State of Oregon.

Applicable

WREGIS Account Holders with registered generating units over 360 kWh nameplate capacity of which PacifiCorp acts as the Balancing Authority.

Definitions

Account Holder

A party that has registered with WREGIS and has established an Account with WREGIS.

Balancing Authority

The area operator that is responsible for matching generation and load, for maintaining scheduled interchange with other balancing authority areas, and for maintaining the frequency, in real-time, of the electric power systems.

Qualified Reporting Entity Contracting

A. Communications

Unless otherwise directed by the Company, all communications to the Company regarding QRE agreements should be directed to:

PacifiCorp
Manager – QRE Services
825 NE Multnomah, Suite xx
Portland, OR 97232

The Company will respond to all such communications in a timely manner. If the Company is unable to respond on the basis of incomplete or missing information from the generation owner, the Company will indicate what additional information is required. Thereafter, the Company will respond in a timely manner following receipt of all required information.

B. Procedures

An applicable Account Holder must execute the Company's standard form Qualified Reporting Entity Agreement. The Agreement contains provisions regarding term and termination of service, interconnection and metering requirements, reporting procedures, service payment schedules and limitation of liability.

(N)

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Effective: With service rendered on and after
, 2008 Original Sheet No.

Issued By
Andrea L. Kelly, Vice President, Regulation

PACIFIC POWER & LIGHT COMPANY
Qualified Reporting Entity Services

OREGON
SCHEDULE 325

Service Charge

The Account Holder will pay the following charges on the schedule set forth in the Qualified Reporting Entity Agreement:

\$xxx.xx monthly fee plus \$xx.xx per hour for work performed in excess of x hours per month.

Issued:	, 2008	P.U.C. OR No. 35
Effective:	With service rendered on and after	Original Sheet No.
	, 2008	

TF1 XXXX.NEW

Issued By
Andrea L. Kelly, Vice President, Regulation

Advice No.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November, 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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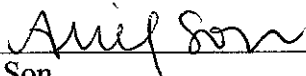
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