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VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1394

Enclosed for filing in the above-referenced docket are an original and one copy of Idaho Power Company's Proposed Issues List.

The schedule in this proceeding calls for the parties to file a Joint Issues List today. Idaho Power received Staff's latest revisions to the utilities' proposed issues list today and had insufficient time to resolve differences between the two proposals before the filing deadline. Idaho Power intends to work with Staff to resolve the differences between Staff's Proposed Issues List and Idaho Power's Proposed Issues List in the next few days and is hopeful that the parties can reach resolution.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Amie Jamieson".

Amie Jamieson

cc: Service List

Idaho Power's Proposed Issues List
UM 1394

1. Does the Commission have authority to require a public utility to provide QRE service to all generators upon request if:
 - a. The generator is located in the public utility's Oregon service territory and is interconnected to the public utility's distribution or transmission system under a valid interconnection agreement?
 - b. The generator is located in Oregon and the public utility serves as its Balancing Authority, but the generator is not located in the public utility's allocated Oregon service territory?
 - c. The generator is located in the public utility's allocated service territory and/or control area, but is not interconnected with the public utility?
2. To the extent the Commission has authority to require the public utilities to provide QRE service, should the service be provided through a Commission-approved rate schedule?
3. If QRE service is provided through a Commission-approved rate schedule, what types of terms and conditions should be specified:
 - a. In the rate schedule?
 - b. In the QRE contract between the public utility and the generator?
4. To the extent the Commission may not have authority to require the public utilities to provide QRE service, are the public utilities willing to voluntarily provide such service? If so, to whom and under what conditions?
5. Is ORS 757.325 applicable to utility-provided QRE Services? If so, are public utilities prohibited by ORS 757.325 from:
 - a. Acting as a QRE for owned or contracted facilities from which the utility is receiving renewable energy certificates (RECs), but not offering QRE service for other generators interconnected to the utility or for which the utility is the Balancing Authority ("Third Party Generators")?
 - b. Charging Third Party Generators for QRE service an amount in excess of the cost of providing such service?

- c. Charging Third Party Generators an amount in excess of the amount it charges a facility from which it is receiving renewable energy certificates?
 - d. Charging Third Party Generators for QRE service but incurring the costs for being a QRE for owned or contracted facilities as an internal charge or cost of doing business?
- 6. What are the requirements to be a QRE under the Western Renewable Energy Generation Information System, and can third parties compete effectively with public utilities to provide QRE service?
- 7. What are the estimated costs for providing QRE service to Third Party Generators?
- 8. Should the public utilities charge generators the full allocated cost or incremental cost for QRE services?
- 9. Would charges for either fully allocated or incremental costs of QRE service be prohibitively expensive for generators?
- 10. Does the Commission have the authority to order that QRE services provided to Third Party Generators be subsidized by ratepayers on a pilot program basis? If so, what are the bases and standards for such authority? Should QRE services to Third Party Generators be subsidized?
- 11. Should public utilities provide a service comprised of reporting generation data that the utility has to Third Party Generators upon request, giving the generator the additional option of choosing an alternative QRE? If so, what are the costs of providing such a service, and what are:
 - a. The bases for those costs?
 - b. The liabilities of providing meter data to an alternative QRE?
 - c. The responsibilities of providing meter data to an alternative QRE? What if the generator wants corrections/adjustments?
- 12. Under what conditions might additional metering be needed to provide QRE service for generators, and who should bear the cost?
- 13. Does the Federal Energy Regulatory Commission have jurisdiction over Qualified Reporting Entity (QRE) service provided by public utilities? Does the answer depend on the design of this service and which function of the utility provides the service?

14. What are the responsibilities and liabilities of the utility providing QRE services?

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1394 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

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