

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 UM 1394

4 In the Matter of

5 THE PUBLIC UTILITY COMMISSION OF  
6 OREGON

PARTIALLY STIPULATED MOTION TO  
CLOSE DOCKET (with conditions)

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

10 **Motion**

11 Staff of the Public Utility Commission of Oregon (Commission) requests the  
12 Commission issue an Order closing this UM 1394 Docket. Staff further requests that the Order  
13 include the following two conditions:

- 14 (1) An investor-owned utility must notify the Commission, all parties to this proceeding, and  
15 all entities using Qualified Reporting Entity (QRE) services of its intent to discontinue  
providing voluntary QRE service 90 days in advance the proposed discontinuance; and  
16 (2) An investor-owned utility will provide data regarding QRE service, subject to protection  
17 of confidential information, if requested by the Commission. The utility's obligation to  
18 provide the Commission with data does not limit any parties' discovery rights in any  
proceeding in which QRE service is relevant.

19 Staff is authorized to state that all Active Parties (identified below) except Oregon  
20 Department of Energy (ODOE), Renewable Energy Coalition (REC) and Exergy expressly  
21 support this motion. ODOE has stated it neither supports nor opposes this motion. Staff sent  
22 REC and Exergy a draft copy of the motion but neither has responded with its position as of the  
23 date of this motion.

24 **Discussion**

25 UM 1394 concerns the provision of QRE services to third-party generators (Generators)  
26 by Portland General Electric, PacifiCorp, Idaho Power Company ("Utilities"). The Generators

1 require the QRE services in order to certify their renewable energy credits (RECs) in the Western  
2 Renewable Generation Information System (WREGIS) pursuant to current WREGIS Operating  
3 Rules. Commission Order No. 09-285 adopted a memorandum of understanding in which the  
4 Utilities agreed to provide QRE service on a voluntary basis and to convene a two-year review  
5 workshop on or around March 15, 2011 to review the success of the voluntary program.

6 The two-year review workshop was held on March 15, 2011. All parties in Docket UM  
7 1394 were invited to attend the workshop and the following did so: Portland General Electric,  
8 PacifiCorp, Idaho Power Company, Renewable Energy Coalition, Industrial Customers of  
9 Northwest Utilities, Exergy, Falls Creek Hydroelectric, Oregon Department of Energy and staff  
10 (Active Parties).<sup>1</sup> The workshop agenda included an introduction of the attendees, a summary of  
11 UM 1394, a presentation by the Utilities of their experience offering this service during the  
12 preceding two years, and development of a consensus opinion of how to proceed.

13 During the workshop the Utilities reported:

- 14 • They provided QRE service to a small number of Oregon Generators – one for  
15 PGE, five for PacifiCorp, and one for Idaho Power.
- 16 • The cost to provide QRE service was near what they anticipated it would be, and  
17 did not add significantly to their workload at current usage.
- 18 • They completed their exploration into providing QRE service outside their service  
19 territory for Generators for which they act as the Balancing Authority. The  
20 Utilities' conclusion was that each would continue to provide QRE service,  
outside their service territory for which they act as the Balancing Authority, for  
the foreseeable future. The Active Parties acknowledge, however, that  
jurisdictional issues, such as present need, may need to be addressed at some  
point in the future.

21 All Active Parties agreed that the Utilities' provision of QRE service on a voluntary basis  
22 went well over the last two years. As a result of this positive experience, the Active Parties  
23 agreed to continue the status quo and to support closing this docket. With regard to continuing  
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26 <sup>1</sup> Bonneville Power Administration did not attend the workshop but has since been involved with  
the preparation of this motion and is included as one of the Active Parties.

1 with the status quo, the Active Parties agreed that the Order closing this Docket should contain  
2 the following conditions:

3 (1) An investor-owned utility must notify the Commission, all parties to this  
4 proceeding, and all entities using Qualified Reporting Entity (QRE) services of its  
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7 (2) An investor-owned utility will provide data regarding QRE service, subject to  
8 protection of confidential information, if requested by the Commission. The  
9 utility's obligation to provide the Commission with data does not limit any  
10 parties' discovery rights in any proceeding in which QRE service is relevant.

11 If requested by any party or entity using QRE service, all Active Parties also agree to support  
12 an expedited schedule to resolve within 90 days of the utility's notice the issues of whether the  
13 Commission has the jurisdiction to require the utility to provide QRE services (a) in the utility's  
14 service territory and (b) in the utility's balancing authority but outside the utility's service  
15 territory.

### 16 Conclusion

17 For the reasons stated, on behalf of the Active Parties, staff requests the Commission  
18 issue an Order closing this docket with the requirements set forth above.

19 DATED this 22<sup>nd</sup> day of April 2011.

20 Respectfully submitted,

21 JOHN R. KROGER  
22 Attorney General



23 Michael T. Weirich, #82425  
24 Assistant Attorney General  
25 Of Attorneys for the Public Utility Commission  
26 of Oregon

1 **CERTIFICATE OF SERVICE**

2 I certify that on April 22, 2011, I served the foregoing MOTION upon the parties in this  
3 proceeding by sending a true, exact and full copy by regular mail, postage prepaid, or by hand-  
4 delivery/shuttle mail to the following:

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Business Activities Section

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19 DATED this 22<sup>nd</sup> day of April 2011.

20 Respectfully submitted,

21 JOHN R. KROGER  
22 Attorney General

23 s/Michael T. Weirich  
24 Michael T. Weirich, #82425  
25 Assistant Attorney General  
26 Of Attorneys for the Public Utility Commission  
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