

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1452 and AR 538

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION)	
OF OREGON)	Closing Comments of
)	The Environmental Law
Investigation into Pilot Programs to)	Alliance Worldwide (ELAW)
demonstrate the use and effectiveness of)	
Volumetric Incentive Rates for Solar)	
Photovoltaic Energy Systems.)	

These closing comments are submitted by the Environmental Law Alliance Worldwide (ELAW) in response to the proposed rules under docket AR 538, the straw proposal under docket UM 1452, and the opening comments submitted by the various stakeholders.

Feed-in tariff (FIT) Pilot Program

PUC Staff and some stakeholders have recommended implementing HB 3039 through a mix of net metering and calls for bids. While both net metering and a bidding process may have their place in Oregon renewable policies, neither of these are a feed-in tariff, which the Commission has been asked to implement.

This is a pilot program. Specifically it is a pilot FIT program. The law directs the Commission to test a FIT. This should not be seen as an opportunity for the Commission to test other kinds of policies. The legislature clearly intended to test a FIT, so the Commission should implement a pilot FIT. Also, economists have found that generating electricity from renewables under a FIT program is likely to be more cost-effective than generating them under a renewable portfolio scheme. For example, Nicholas Stern has stated: "Comparisons between deployment support through tradable quotas and feed-in tariff price supports suggest that feed-in mechanisms achieve larger deployment at lower costs." Stern, N. (2007): *The Economics of Climate Change - Stern Review, Part IV: Policy Responses for Mitigation*, Cambridge University Press, Cambridge, UK. The report is available at: http://www.hm-treasury.gov.uk/sternreview_index.htm. ELAW hopes Oregon can take advantage of this opportunity to test a FIT and see what we can learn about designing a good FIT program for the long-term.

Federal Preemption and Program Design

Concerns about possible federal preemption have been raised. ELAW finds that there are several ways to implement a FIT without infringing on federal jurisdiction. ELAW outlined two such approaches in its opening comments, and continues to believe these are the best options for moving forward:

1. Utilities pay avoided cost for the electricity purchased, and also provide an incentive payment for every kWh of electricity generated under the program during the 15-year contract period; or
2. Utilities pay avoided cost for the electricity purchased and pay a set price for the renewable energy certificate (REC) that is associated with the electricity generated under this program for the 15-year contract period.

Since opening comments were submitted, the National Renewable Energy Laboratory (NREL) published its report: *Renewable Energy Prices in State-Level Feed-in Tariffs: Federal Law Constraints and Possible Solutions*, NREL Technical Report NREL/TP-6A2-47408 (January 2010). This report supports ELAW's recommendations outlined above.

The opening comments submitted jointly by Pacific Power and Idaho Power support the first option, and add that the utilities could sign a document agreeing to the arrangement which would make this a voluntary program that the utilities commit to comply with. (*Joint Comments of PacifiCorp D/B/A Pacific Power and Idaho Power Company*, at pgs 7-9). This arrangement would enable the Commission to design a strong, simple program that would not be preempted by federal law. ELAW supports this option.

The comments by the Oregonians for Renewable Energy Policy and its coalition (which includes ELAW) also support this approach (*Joint Opening Comments of Oregonians for Renewable Energy Policy et al.*).

Other stakeholders have proposed a different way forward. The Staff and Renewable Northwest Project (RNP) and others call for the Commission to design a combined net metering "plus" program and a bidding process. (*See, PUC Staff Opening Comments, Opening Comments of Renewable Northwest Project and Partners on PUC Staff's Straw Proposal for Feed-in Tariff Design, and Opening Comments of the Citizens' Utility Board of Oregon.*) This proposal has several flaws. These programs would not test the efficacy of a feed-in tariff, which is the primary goal of HB 3039. Also, these programs would create a very complicated program to implement. The more complicated the program, the more it costs to implement, and the less consumers will participate.

Another problem with net metering plus a VIR payment is that utility customers who are currently under a net metering agreement with the utility may think it is unfair that their neighbor, who is also net metering, is getting paid at a substantially different rate. Creating a completely new program that includes generating under a FIT agreement should not create this problem.

Other stakeholders also find problems with Staff's proposal. PGE states in its opening comments: "Staff's proposed solutions to the FERC jurisdictional issue are less clean. PGE asks for a provision that would require program participants to pay the utilities back if it is determined that the net metered transaction was actually a wholesale transaction. (*PGE Opening Comments* at pg. 4.) This provision seems likely to scare people enough to dissuade them from entering into a contract.

Pacific Corp and Idaho Power state the net metering plus proposal is "complex and may prove to be difficult to understand and administer" and that the "structure of the net metering VIR program may create a perverse economic incentive for participants to consume as much energy as they generate – whether they need it or not." (*Joint Comments of PacifiCorp D/B/A Pacific Power and Idaho Power Company*, at pg 4). These utilities note "[t]his is a serious defect that could significantly undercut the integrity of the program." (*Id.*)

The second half of the Staff's proposal – the proposal for a competitive bidding process - - has none of the elements of a FIT program. Pacific Corp and Idaho Power's comments state that "this approach could prove expensive and administratively burdensome." (*Joint Comments of PacifiCorp D/B/A Pacific Power and Idaho Power Company*, at pgs 7). ELAW agrees.

This split program is likely to ensure that larger systems are paid at a higher rate than smaller systems. No business would bid a solar project that did not include at least a minimal rate of return. If the VIR proposed for the small projects does not cover all the costs of installing and generating solar, plus a reasonable rate of return, this dual system will provide a rate of return on large projects, but not on small projects.

A bidding system will not help grow the solar industry in Oregon. Periodic bidding is not a sustainable business model. It does not create the certainty needed to build a strong business. If a business bids for a solar project and loses that bid, it is left to wait another year to bid again with no way to know whether it will be successful next year. If we set the rate that will be paid for any electricity generated under a FIT program and let businesses decide whether that price will work for them, it will create a strong, stable industry -- creating more jobs for Oregonians.

Small-scale systems

HB 3039 calls for 75% of project to be small-scale systems. I urge the Commission to ensure that a significant portion of the project is set aside for residential systems.

Oregon has yet to create a robust residential solar program. We know Oregonians want to help combat climate change. We know Oregonians want to put solar panels on their roofs. What we don't know is what it will take to get the panels on the rooftops. Let's find out.

If we do not reserve a significant portion of the program for residential systems, we will lose the opportunity to grow this sector of the industry. If what we learn from this pilot program is the price we need to pay to incent 100 kW systems, we won't learn what it will take to get small systems on residential rooftops, which will cost more than the larger systems.

Geographic differences

PGE states that geographically differentiated rates are not appropriate or useful. Differentiated rates would try to address the differences in output between regions in Oregon. A system in a sunny part of the state will produce more, and pay more, than a system in a less-sunny part of the state. (*PGE Opening Comments* at pg. 18).

Commissioners' Questions

ELAW wishes to address a few of the Commission's specific questions.

Question 3. ELAW finds that the perverse incentive is a real problem even if no one ever wastes energy to reap the full benefits of the program. Creating a program that includes the possibility of an incentive to consume more energy is not the direction the Commission should be headed. States and public utility commissions across the country are looking for ways to incent energy conservation and efficiency. Oregon should not adopt a program that creates the opposite incentives. Adopting a new program that creates incentives to consume more energy could subject that policy and the State of Oregon to national ridicule and undermine our efforts to chart a better energy future.

Stakeholders have said that residential roof top systems are unlikely to generate more than is consumed on the premises. This does not consider ground-mounted installations or other installations that may be installed under a well-designed program. This perverse incentive may limit the types of systems that get installed under the program – limiting what we will learn.

In addition, the Commission should not be designing a program that is unlikely to work for Oregon's most energy efficient homes – those most likely to want to participate in the program.

Limiting the size of installed systems to address the perverse incentive problem is not the way to go. We will not learn everything we want to learn under the pilot program if we artificially limit the size of installed systems.

Question 5. The rate of participation in the program is very likely to be based on how the incentive rate is set. If the rate is set too low and there is little participation, the rates should be increased to increase participation. The comparison of the programs should evaluate the rate (the speed) of added installations, the cost of the programs, the volume of energy generated, who benefited from the expenditures, the distribution of the projects, and other factors.

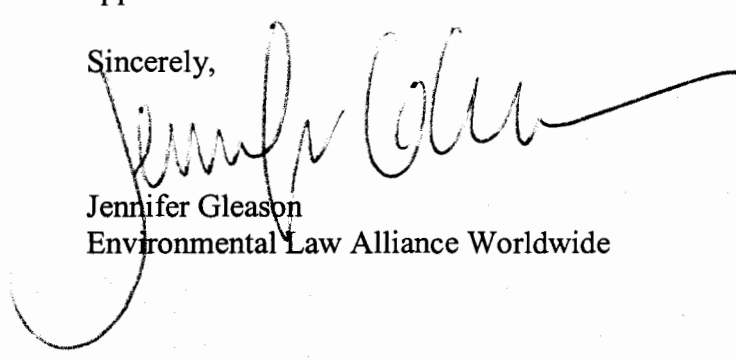
Question 6. ELAW supports creating “carve outs” and/or setting higher rates for entities without tax liability. Exploring energy development in this sector would be a good undertaking for the pilot project and could yield valuable lessons.

Question 7. The rates should be based on the cost of installation and generation plus a reasonable rate of return. OREP seems to have done the best job of considering all the costs and incorporating those costs in its calculations. ELAW supports OREP’s rate calculations.

Question 9. Reducing rates over time *may* be a good idea in the design of a longer term FIT program. Automatic digression of rates in this pilot program that limits the available production capacity each year and will be fully subscribed in four (or two) years would be inappropriate. In the four (or two) years that this program will exist, the Commission should have the flexibility to adjust rates to respond to what is happening under the program. Adjusting rates to respond to what happens under the program would help us learn from this pilot program.

ELAW appreciates the opportunity to participate in the process to develop a strong solar energy program for Oregon. The PUC Staff has done a tremendous job working with a large group of stakeholders to develop a proposal for implementing HB 3039, and ELAW appreciates the Staff’s efforts.

Sincerely,

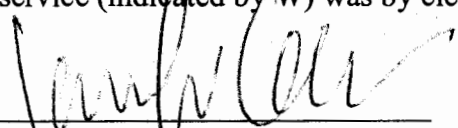


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CERTIFICATE OF SERVICE

I certify that on February 12, 2010, a true and correct copy of the Environmental Law Alliance Worldwide's closing comments in the PUC AR 538 rulemaking and UM 1452 docket was served on the parties listed below. Service was by First Class U.S. mail to all parties unless they have waived paper service. Service to parties who waived paper service (indicated by W) was by electronic mail.


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