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December 12, 2014

Public Utility Commission of Oregon
3930 Fairview Industrial Drive SE
P.O. Box 1088
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Attn: Filing Center

RE: UM 1690 – PGE’s Comments in Response to the Voluntary Renewable Energy Tariff Issues List

Portland General Electric (PGE) appreciates this opportunity to comment on the many issues set forth in this Voluntary Renewable Energy Tariff (VRET) Docket.

To provide more specific context for PGE’s responses, we have identified at least two viable VRET models for customers based on those presented in the VRET Models Summary Table. In identifying these two models as context for our comments, we are not stating a commitment to offer them nor do we intend for them to be exclusive.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

A handwritten signature in black ink, appearing to read "Karla Wenzel". The signature is written in a cursive, flowing style.

Karla Wenzel
Manager, Pricing and Tariffs

cc: UM 1690 Service List

Subscription Model and Utility Owned:

PGE would aggregate subscribers to pay a premium for a PGE owned green resource. The green resource could be built by a third party through a competitive process. PGE would rate base the equivalent of null power at avoided cost; PGE would only receive the power from the resource and only subscribers would claim the renewable attributes of the resource.

Subscribing customers would take service under PGE's cost of service and the premium paid would secure the RECs from the project for the subscribing customers. This is different from PGE's existing Schedule 54 service as subscribers could identify the resource providing their RECs (billboard feature) and without the subscriptions, the green resource would not have been built. All customers would get the power produced from the green resource.

Power Purchase Agreement (PPA) Model and Third Party/Customer Owned:

A customer or third party would own the green resource. The owner would secure transmission to PGE service territory. PGE would purchase the output and RECs on behalf of participating customers. Participating customer(s) would pay PGE's cost of service price and be credited at avoided cost or market for the delivered renewable power. Participating customers could claim both the power and RECs from the resource in proportion to their purchase.

I. How should a Voluntary Renewable Energy Tariff (VRET) be defined and designed?

- 1. What are the essential features of such a tariff (e.g. ability to purchase power at a long term, fixed rate)? If the Commission were to allow VRETs, would more than one type of VRET design help to satisfy diverse customer demands?**

While there is no standard set of essential features of a VRET, a VRET offers an opportunity for the utility to offer a renewable based tariff offering to large non-residential customers. Costs are difficult to predict over the long term, and subsidy by nonparticipating customers to participating customers is prohibited under the law (HB 4126). Maintaining flexibility in the VRET designs may help satisfy different customer preferences.

- 2. Should a regulated utility continue to plan for VRET load through integrated resource planning? Should VRET customers be included in a regulated utility's total retail sales?**

Yes. PGE is required to provide capacity resources for the VRET load, which by its renewable nature, is met with intermittent resources.

- a) Should VRETs be considered for all non-residential customers or only a subset of non-residential customers (e.g. only large customers)?**

No. To minimize administrative burdens, there should be an appropriate threshold for eligibility.

- b) Should there be a cap on the amount of load that can be served under a VRET to protect against risk of large amounts of load leaving the existing cost-of-service system (e.g. the 300 average MW cap for direct access in PGE's 400 series cost-of-service opt-out schedules)?**

With regard to the two proposed models, since customers would be paying PGE's cost of service, there is no need to cap the amount of load that can be served. As a policy matter, parties may want to cap the amount of eligible load to pilot the VRET concept and determine the degree of customer interest and participation, rather than take a proposal to full scale. Unlike direct access, the utility is serving the load, and the risk can be assessed through integrated resource planning if significant.

- 3. What portion of a customer's load should a VRET be able to serve? All load? Partial load? Service at a given Point of Delivery (POD)? Should VRET customers be able to aggregate multiple sites/PODs?**

A VRET should serve whatever amount of load the customer desires. Customers should be able to aggregate multiple sites/PODs.

- 4. Should VRET load be met with multiple renewable resources that are aggregated? If so, how should the regulated utility disclose the renewable resources provided as an aggregated product?**

Aggregated renewable resources should be an option. As part of the service agreement or tariff filing, the utility may disclose what renewable resources are included in that aggregation.

- 5. Given the variability of renewable energy generation, what services should be included in a VRET to enable delivery of renewable energy (e.g. back-up/supplemental services or firming/shaping)?**

A VRET should include ancillary services to address the variability of renewable energy generation. In the examples above, PGE assumes that its generation portfolio will be providing the ancillary services for the intermittent renewable energy from the VRET product.

- 6. For comparison, with regard to existing Direct Access as summarized in the VRET Models Table:**

- a) Are there service requirements (e.g. transition charges, enrollment windows, etc.) applicable to direct access that should not be required in provision of service under a VRET? If so, what is the rationale for differentiating between direct access requirements and VRET requirements?**

With the models provided, given that the participating customers are paying cost of service, there is no need for transition adjustments (credits or charges), nor should enrollment windows be required. The difference between VRET and direct access is that the utility is offering a regulated premium product; the customers are contributing to fixed generation costs by staying

on cost of service; and customers are not exiting the utility's cost of service system for the market.

b) What "green energy" options do Energy Service Suppliers (ESS) currently offer in utility service territories under direct access?

This is currently unknown.

c) Are there new or additional ESS offerings that regulated utilities can enable through direct access that will meet the requirements of direct access laws and improve customer access to the kinds of "green energy" products that they are seeking?

This is currently unknown.

II. Whether Further Development of Significant Renewable Energy Resources is Promoted?

- 1. Should VRET renewable resources be defined to include the same types of renewable energy resources as the Renewable Portfolio Standard (RPS) (e.g. solar power, wind power, but only certain types of hydroelectric power)? Should "further development of significant renewable energy resources" include buying the direct output and/or bundled Renewable Energy Certificates (RECs) from a *new* renewable resource power plant? From an *existing* plant? How should "new" and "existing" plants be defined? Should there be a limit on how old the plant is? (e.g. recently constructed or constructed since a selected year)?**

The Oregon RPS definitions of "renewable energy source" and the date used in describing "qualifying electricity" are reasonable guidelines and can serve as a proxy for significant renewable energy resources within a VRET. There is no need to create Green-e style limitations or insert additional complications about what should qualify. The term "new" was considered and discarded in the development of the language of HB 4126 and should not be used here. Using an existing resource in a VRET would, by its very use, eliminate that project from use in compliance with the RPS and require utilities to acquire additional new resources to comply with the RPS. The VRET would then serve to further develop renewables.

- 2. In order to be considered "further development of significant renewable energy resources," should there be geographic limits on the source of eligible renewable energy (e.g. Oregon or the Northwest)?**

Geographic limits for eligible renewable energy are not included in the law and should not be included in regulation. Resource procurement should meet customer needs and requirements, including attention to cost. The location of the resource and proximity to ancillary services is likely to affect these factors, and should be viewed in that context instead of creating artificial geographic limitations. However, should a geographic limitation be sought, we would encourage the limitations provided in

the Oregon RPS – projects located within the WECC and for which the electricity is delivered to the BPA, to the transmission system of the utility offering the VRET, or delivered to a point for subsequent delivery to the utility offering the VRET.

- 3. Given that the RPS is a minimum threshold for utilities in the existing cost-of-service rate based system, what should be the minimum renewable energy required in a VRET product (not including non-renewable resources that may be needed for back-up/supplemental service or firming/shaping)?**

The VRET product should offer customers an opportunity to reach 100% or more green.

- 4. Of all the models in the VRET Models Table, which model is most likely to promote “further development of significant renewable energy resources”?**

Further development of significant renewable resources will be best promoted through the meeting of customer and system demand. This, in turn, will depend on the price and other features that relate to the resource. The more variety we are able to test through this process, the more information will be available to the commission to weigh the results.

III. What may be the Effect on Development of a Competitive Retail Market?

- 1. How should a VRET’s effect on competitive suppliers and the direct access market be assessed?**

A VRET’s effect should be assessed separately with consideration of the model design. For example, under a utility owned model, a VRET would operate within the regulated environment.

- 2. Is the competitive retail market harmed if a regulated utility is able to make offerings under a VRET to non-residential customers that a third party competitive supplier is not permitted to provide under the terms of current direct access tariffs (e.g. enrollment windows and transition adjustments)? If so, how?**

No. Given that the utility is prohibited from nonparticipants subsidizing participating customers in offering a renewable product, the market is not harmed if the utility may offer a VRET under cost of service.

- 3. With respect to Model 1(b/x) [third party owned resource & regulated utility facilitated] and Model 1 (c/d) [third party owned resource with aggregation]:**
 - a) What are the effects, if any, on the competitive retail market if Independent Power Producers (IPPs) supply power through the regulated utility as part of VRET design in these models?**

IPPs currently supply renewable power to PGE and would likely continue to do so when the Green Tariff is made available.

b) What should the role of the regulated utility be in developing and offering a product or transacting between customers and an IPP under these VRET models?

It depends on the offering. One example of the utility facilitating role identified in the table is the utility could purchase power from the IPP on behalf of customers.

c) Would these VRET models comport with the requirements of a filed tariff (e.g. must list prices and be accessible to all similarly situated customers [see HB 4126 Section 3(4) and ORS 757.205, 757.210, 757.212, 757.215])? Can these models be implemented such that an IPP is not required to provide confidential pricing data to a regulated utility (e.g. non-disclosure agreements)?

If PGE were to offer a VRET product, it would tariff the offering. A model could be implemented such that an IPP is not required to disclose confidential pricing data to the utility. A question is raised whether the PUC would then govern the IPP's pricing, resource content, and any required resource reporting, since this is a regulated option.

4. With respect to Model 1(c/d) [third party owned resource with aggregation] and Model 2(c/d) [regulated utility owned resource with aggregation], if aggregation is allowed, should a regulated utility be prohibited from acting as an aggregator such that the VRET would only permit aggregation by registered aggregators (see OAR 860-038-0380)?

No. Enacted following the passage of SB 1149, OAR 860-038-0380 sets forth requirements for aggregators assuming that the Commission has limited or no jurisdiction over aggregators. The rule is intended to protect consumers and requires registration which includes providing contact information, furnishing a toll free number for complaints, complying with all laws, and responding to the Commission. Given the Commission's broad authority over utilities, utilities should neither be prohibited from acting as aggregators nor be required to register with the Commission as aggregators.

5. With respect to Model 2 [regulated utility owned resource] and Model 2(c/d) [regulated utility owned resource with aggregation], what are the effects, if any, on the competitive retail market if a regulated utility owns or operates resources as part of VRET design in these models?

If an additional supplier, such as the utility, enters the market, it promotes the overall growth of the competitive retail market. The law prohibits the utility from nonparticipants subsidizing participating customers and leveraging its monopoly position in the market. In the first model example provided, VRET customers will pay for a premium product in addition to paying for cost of service.

6. With respect to Model 4(a/X) [customer owned resource]:

a) What are the effects, if any, on the competitive retail market if a customer owns or operates resources as part of VRET design in this model?

Another actor in the market has a positive effect on the competitive retail market, even if the actor is a customer. Under PGE's existing tariff, customers own and operate generating resources through net metering, PURPA contracts, and partial requirements service.

- b) Can this model already occur through Partial Requirements tariffs (e.g. PGE schedules 75, 76R, 575 or PacificPower schedules 47, 247, 747)? If not, how is it differentiated from partial requirements service?**

Yes. PGE's partial requirements tariff, Schedule 75, applies to large nonresidential customers supplying all or a part of their load by on-site self-generation operating on a regular basis, where the nameplate capacity of the self-generation is at least 2 MW. This model could support off-site resources that do not qualify for partial requirements service.

- c) Would this VRET model comport with the requirements of a filed tariff (e.g. must list a price and must be accessible to all similarly situated customers [see HB 4126 Section 3(4) and ORS 757.205, 757.210, 757.212, 757.215])?**

It could. As stated, if the customer owned resource is on-site, the utility cost of service customer could be net metered (if under 2 MW) or be a partial requirements customer. If the customer owned generation is off-site, the customer may qualify as a Qualifying Facility and be paid the utility's avoided cost rate for power produced. The utility's avoided costs are set and filed with the Commission.

- d) If a customer owned renewable resource is off-site, should it be treated as a third party supplier (e.g. similar to the IPPs role in Model 1(b/x) [third party owned resource & regulated utility facilitated])? If not, why? May a customer that generates more power at an off-site resource than needed at a given time sell the excess power to other customers?**

It could be treated as a third party supplier and sell to the utility at the avoided cost rate or alternatively, be credited at the avoided cost or market rate on the customer's cost of service bill for the power produced. A VRET model could be designed to have the customer participate in cost of service with the power produced by the off-site resource credited to the customer.

- e) Should on-site resources be limited to the Net Metering program? Does inclusion as a net metered resource depend on if any excess energy generation is anticipated? If a customer owned resource is on-site, but is permitted to be operated and managed by the regulated utility or IPP as a service provided through a VRET, should it be distinguished from the Net Metering program?**

If the resource is located on-site and designed to meet house load, it could be net metered (limit 2 MW) or receive partial requirements (2MW or greater) service. If the resource was net metered,

the OARs governing net metering and interconnection apply. If the resource is operated and maintained by the utility or IPP, the customer owns the resource, the resource is used to offset the customer's house load, and the net metering rules are otherwise met, it should not be distinguished from the net metering program. Another consideration: if the resource is net metered and sized at no more than 90% of the anticipated load, there is room for a service provided through a VRET to provide protection to the customer on production risk and to "backfill" the remaining gap in production with a green product to ensure that the customer meets 100% of load with green energy.

IV. What may be the Direct or Indirect Impacts on Non-Participating Customers?

- 1. What regulatory tools or VRET design elements (e.g. transition charges for customers that leave the cost-of-service system) would ensure that the prices paid for products under a VRET reflect all costs associated with providing that service, including any requisite back-up/supplementary service (e.g. firming/shaping), without subsidization from non-participating customers?**

As provided in the two model examples set forth, VRET customers will continue to pay cost of service, which means they continue to contribute to the utility's fixed generation costs and the utility resources placed in service to meet customer needs. PGE does not view VRET customers as "leaving its cost of service system." The utility's fleet of generation resources will be used to provide the ancillary services necessary for the VRET intermittent resource(s). The costs of designing and administering VRET models will be separately accounted for and included in charges to participating customers.

- 2. What regulatory tools or VRET design elements would ensure that non-participating customers do not face increased risk of VRET obligations (e.g. costs of under-subscribed VRET resources or unfulfilled power purchase agreement obligations)?**

The PUC's review authority and stakeholder involvement provide safeguards against subsidy by non-participating customers to participating customers. A risk premium or "exit fee" could be built into the VRET design to safeguard against unfulfilled obligations.

In the first of PGE's example models above, PGE suggests a model that could aggregate customer subscribers so that a new renewable resource is built (by PGE or third party) and owned by PGE. To avoid cross subsidization and minimize company/shareholder risk of under subscription, the model provides that PGE would rate base the resource at null power cost (with the opportunity to earn a rate of return on it), for the benefit of all customers, and the amount over and above the null power cost would be paid by the subscribers who would then "claim" the environmental attributes of the resource.

- 3. How should the fixed costs of the existing cost-of-service rate based system be allocated to VRET participants that completely or partially leave the cost-of-service rate based system?**

The models PGE has set forth as examples do not have the VRET customers leaving cost of service and VRET customers continue to contribute to the fixed generation costs of resources that the utility put in service for customer loads.

- 4. Assuming that VRET load is part of “total retail electric sales,” what would be the impact to RPS resource cost recovery and compliance requirements if a significant amount of VRET load leaves the cost-of-service rate-based system? Would VRET customers continue to pay for RPS compliance requirements (e.g. their share of rate-based RPS renewable resources and RAC filings)?**

To avoid cost shifting to non-participating customers, VRET customers should continue to pay for RPS compliance costs.

- 5. With respect to Model 2 [regulated utility owned resource] and Model 2(c/d) [regulated utility owned resource with aggregation], should the regulated utility have a separate set of resources used for VRET customers in a “VRET rate base” for which the costs and rate of return are regulated by the PUC? How should the regulated utility account for separate capital investments and costs of capital related to a VRET?**

No. PGE does not support the utility having a separate set of resources used for VRET customers, the capital for which is separately accounted for. The utility owned model PGE poses as an example, is one in which, once built and placed in service to serve customers, the renewable energy resource is added to rate base at a null power cost. The power produced is available to all PGE customers as part of PGE’s fleet of generation resources. However, PGE will not claim on behalf of all customers, the renewable attributes, e.g. RECs. Rather those are claimed for/by participating customer subscribers, who are cost of service customers willing to pay a premium for the renewable attributes from that particular resource. By rate basing at null power cost, PGE provides the power for all customers and has the opportunity to earn a return on the capital used for the null power cost portion only since subscribers are paying for the renewable attributes.

- 6. With respect to Model 2(c/d) [regulated utility owned resource with aggregation] and Model 1(c/d) [third party owned resource with aggregation], if the regulated utility is allowed to aggregate retail load through a VRET, how should the regulated utility manage the risk and timing of the matched VRET load and/or the obligations to the aggregated RE generators?**

With regard to the model examples, PGE is not interested in taking on significant risk of under subscription. With regard to building a renewable resource and having subscribers participate by paying a premium, the size and cost of the resource would determine the premium price and number of subscribers necessary to realize it. PGE has not determined the degree to which the project would have to be fully subscribed before building (by PGE or third party). PGE has not surveyed its customers to determine demand for the VRET. In any arrangement, given the prohibition on cross subsidy by non-participating to participating customers and the risk to Company shareholders, under participation could be a significant utility risk.

V. Whether VRETs should rely on a Competitive Procurement Process?

- 1. Should the Commission limit VRET resource eligibility to renewable energy developed and supplied through a competitive procurement process? With an independent evaluator? If yes, why? If no, how should the Commission evaluate renewable energy not supplied through a competitive process?**

No, the PUC should not limit VRET resource eligibility to renewable energy developed and supplied through a competitive procurement process or an independent evaluator. The reasons for use of the competitive procurement process in developing resources for the entire customer base in a least-cost manner do not apply here. A truly competitive marketplace would force efficiencies lest a customer choose another option. Additional processes, such as those in the competitive procurement process or use of an independent evaluator, add administrative costs which have been borne by the utility shareholders or passed along to participating customers, raising prices for those customers. If there are customers interested in paying the premium and the objective is to further the development of significant renewable resources, the PUC should balance the supply of the renewable energy with the objective achieved. VRET resource eligibility should be based on the certification of the RECs and not based on the competitive bidding process related to construction and siting of projects.

- 2. Should the PUC's existing processes for competitive bidding (currently for "major resources" defined as quantities greater than 100 MW and duration greater than five years [UM 1182, Order Nos. 12-007 and 11-340]) be adapted for use with VRET resources and, if so, how should it be changed?**

No. It should not be used.

- 3. With respect to Model 2 [regulated utility owned resource] and Model 4(a/x) [customer owned resource], is there any room for a competitive procurement process in these models?**

If the utility owns the resource, then the engineering, procurement and construction processes could go through a competitive procurement process.

- 4. With respect to Model 2(c/d) [regulated utility owned resource with aggregation], what regulatory tools or VRET design elements would ensure that a regulated utility-owned resource fairly competes in a competitive procurement process?**

The regulatory tools currently available in the IRP process may be used to ensure that costs are prudent.

VI. Other considerations

1. What customer protections may be appropriate for VRET resources (e.g. Green-E certification? Commission or advisory group oversight)? For which customer classes or subsets of classes?

Customers eligible to participate in a potential VRET offering are large nonresidential customers and by their nature, informed, sophisticated and not in need of the same consumer protections provided for residential customers. The PUC's oversight and audit authority, coupled with active stakeholder involvement, provide ample protection to participating and nonparticipating customers.

2. How will resources developed for a VRET, for which environmental attributes will be claimed by customers, be represented in power mix disclosures (e.g. regulated utility disclosures pursuant to OAR 860-038-0300)? Assuming that a VRET could be used for partial loads with continued use of the existing cost-of-service rate based system, how would such a customer claim its renewable resource use (e.g. claim a portion of the RPS in its "green" marketing)?

Resource mix disclosures for VRET resources would be treated similar to the utility labeling requirements for resource mix disclosures in OAR 860-038-0300, subject to changes to the OAR as a result of AR 555. The customer's renewable resource mix percentage would be based on their VRET generation output as a percentage of the customer's total annual kWh use. The percentage of the RPS portion of utility generation could be applied to the customer's total annual kWh consumption, less the VRET resource contribution, to determine the RPS component. The customer would then add the VRET and RPS percentages together to determine their total use of renewable resources.

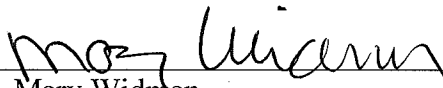
3. What other factors, if any, should the Commission consider in determining whether and how utilities should offer VRETs to non-residential customers?

PGE does not identify any other factors the Commission should consider in determining whether and how the utilities should offer VRETs to nonresidential customers.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS ON ISSUES LIST FOR VOLUNTARY RENEWABLE ENERGY TARIFFS** to be served by electronic mail to those parties whose email addresses appear on the attached service list for Docket No. UM 1690.

Dated at Portland, Oregon, this 12th day of December, 2014.



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