

December 12, 2014

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon
3930 Fairview Industrial Dr. S.E.
Salem, OR 97302-1166

Attn: Filing Center

**RE: UM 1690 – Voluntary Renewable Energy Tariffs for Non-Residential Customers
PacifiCorp’s Comments in Response to the Voluntary Renewable Energy Tariff
Issues List**

PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company) submits these comments in response to the November 7, 2014 request of Public Utility Commission of Oregon (Commission) Staff. The Company commends Staff for their hard work in developing the final issues list, which accurately identifies the remaining issues that should be considered as part of the Commission’s study of the impact of utilities offering voluntary renewable energy tariffs (VRETs). Keeping in mind that customer interest is the driving force behind VRETs, from PacifiCorp’s perspective, Commission implementation of VRETs will be successful if the VRETs respond to customer needs. To that end, flexibility in VRET design and flexibility in VRET resource ownership structures are critical to ensuring that the key purpose of a VRET is achieved—customer satisfaction. The questions identified in Staff’s November 7, 2014 Issues List are re-created in whole below, followed by the Company’s comments in response.

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?

Customer needs are different with respect to VRETs and, at this stage, it is critical that the Commission retain flexibility for utilities to potentially bring forward for approval VRETs responsive to these different customer needs. This flexibility is important to allow other utilities to create distinct VRETs for distinct sets of customers—for example, a subscription-based offering for smaller customers or a specialized, bilaterally negotiated offering for a larger customer. Although the Company does not identify essential features of a VRET, a consistent need identified by customers is certainty, which a VRET could address through set terms that guarantee the VRET offering for a term longer than what is currently available to customers through existing tariffs.

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?

The Company's integrated resource plan (IRP) is a tool for identifying resource need for the Company's integrated system that looks at the forecast of total load obligations compared to current and potential new resources. As such, whether or how VRET load will be reflected in the IRP may depend on the magnitude and predictability of the load, VRET resource, and the term of the VRET commitments. If under a VRET the utility retains the obligation to provide cost-based service, then for a potential VRET that has a relatively short term of service, such as one year, it would be appropriate for the utility to continue to plan to serve participating customers. For long-term commitments, such as five years and over, VRET load may be removed from load obligations based on the appropriate term.

Alternatively, depending on the utility's relationship to the VRET resources, i.e., if it is utility owned or contracted, it may be appropriate to include VRET resources in the IRP as a way to offset load obligations and to capture any integration requirements associated with the difference between VRET load and VRET resources.

How or if VRET load is included in the utility's total retail sales depends on the how the retail sales number will be used and should be consistent with the goals of the renewable portfolio standard (RPS) without resulting in double-counting of load served by renewable resources. For instance, if VRET load is served by resources that are RPS-eligible, that load should not be included in the utility's retail sales for purposes of determining that utility's RPS compliance obligation. If VRET load served by RPS-eligible resources is included in retail sales, the perverse outcome is that VRET customers may increase the utility's RPS obligation while simultaneously being served with RPS-eligible resources, an outcome that could lead to increased RPS compliance costs for non-VRET customers.

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

Similar to the Company's answer to Question 1 above, at this time the Company recommends the Commission maintain maximum flexibility for VRET parameters at this time and not limit the VRET to only certain customers. However, as the Company discusses in further detail below, the Company supports setting eligibility criteria and caps on VRET offerings that reflect the distinct needs of distinct classes of customers.

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)?

Yes, the Company supports participation caps for VRET offerings available to larger customers. For other VRET offerings, whether to institute a cap and the nature of the cap will be determined by a variety of factors. For example, a cap may be tied to the type of resource or

resources identified to serve the load. Preserving utility flexibility to propose program caps tailored to the needs of a particular VRET offering ensures utilities are able to respond to customer need and attract participants to the VRET. A cap may also be appropriate while the Commission and the Company assess if potential unanticipated cost shifting to non-VRET customers is taking place.

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?

It is premature to make this determination at this time as it may exclude from consideration versatile and innovative VRET options. Whether it makes sense to limit the amount of a customer's load that can be served under a VRET is an issue that can and should be addressed as part of the Commission's consideration of a utility's proposed VRET offerings. However, any VRET load during specified time periods not simultaneously served by a VRET resource should be subject to an applicable Commission approved tariff.

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?

PacifiCorp supports consideration of a variety of opportunities for meeting VRET load, including the use of aggregated renewable resources. To that end, the Company agrees that VRET load *could*, as opposed to *should*, be met through aggregate renewable resources. If PacifiCorp contracts for the aggregated renewable resources, the Company would be able to identify specific RPS eligible resources. If a third-party, such as the VRET customer, contracts for the aggregated renewable resources, the third-party should be required to provide a certified report of RPS-eligible resources to the Company for the Company to pass through in any reporting requirement. The Company has no opinion at this time on how the Company should disclose this information.

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)?

The Company supports consideration of the broadest possible range of services, including back-up services, supplemental services, and firming and shaping, for inclusion in a VRET. These services are potentially critical to delivery of variable renewable resources and therefore the utility's cost of providing these services should be considered through any VRET design.

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?

A VRET is fundamentally different from direct access. While direct access allows customers to choose their own service provider, the service the customer receives is fundamentally the same as what they would otherwise receive from the incumbent utility. However, a VRET allows customers to choose unique terms of service to ensure that generation serving the customers reflects that customer's generation profile needs (e.g., 100 percent renewable or 100 percent zero-emission). Thus, while both programs provide the customer with additional choice, their core purposes are different.

To retain flexibility for the utility to respond to customer needs, PacifiCorp recommends that VRET offerings not be limited to an enrollment window, as is the case with direct access. Although an enrollment window may make sense in the context of direct access, for purposes of the VRET, customers should be free to initiate VRET service based on the timing of resources. For a large, customer-specific offering the VRET may require bilateral negotiations to determine the exact terms of a particular VRET service or resource, and would therefore not be conducive to an enrollment window.

Although direct access and a VRET are conceptually distinct, both direct access and a VRET have the potential to create similar impacts, specifically, the potential for cost-shifting of fixed and variable generation costs from customers electing direct access or a VRET, to customers that do not. Like in the direct access program, the Company strongly supports examining methods for addressing potential cost-shift concerns in the VRET context.

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

Not applicable to PacifiCorp.

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?

Not applicable to PacifiCorp.

II. Whether Further Development of Significant Renewable Energy Resources is Promoted? (*issues related to HB 4126 Section 3(3)(a)*)

- 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)?

PacifiCorp urges the Commission to adopt a broad definition of VRET resources that is not limited by the definition of renewable resources under the renewable portfolio standard (RPS). First, a definition more expansive than the definition of eligible renewable resources in ORS 469A.025 is consistent with HB 4126; if the legislature wanted VRET choices to be limited to RPS-eligible renewable resources, they would have made that clear in the language of HB 4126. Second, the VRET is a customer-driven utility offering that should be responsive to the needs of individual customers. Customers electing a VRET may seek a generation profile that has, for example, zero carbon emissions. Although PacifiCorp does not intend to include resources currently included in the Company’s portfolio in a VRET offering, for this hypothetical VRET customer, non RPS-eligible hydro is a potential product that a VRET customer may desire. A utility or other entity would be precluded from including this type of resource in the VRET offering if VRET resources are limited to only RPS-eligible renewable resources.

Again, considering the customer-driven nature of any VRET offering, the question of “additionality,” or whether output or RECs should be purchased from new, as opposed to existing, renewable resources, the Company recommends the Commission not prematurely limit VRET offerings to only one or the other. However, it is worth pointing out that based on discussions that the Company has had with customers interested in a VRET, many customers’ corporate objectives recognize “additionality” as a desirable feature for participation. Given the customer-driven nature of a VRET, in order to be a viable offering, a VRET will likely need to incorporate some level of new—i.e., additional—resources in order to respond to customer needs.

- 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)?**

The primary consideration under any VRET offering is the customer’s need. To that end, if the renewable resource meets the customer’s need, the location of the resource should not be prescriptive. In addition, and similar to the question II(1) above, if the legislature intended to geographically limit the locations for development of renewable energy resources, it would have plainly said so in HB 4126.

- 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)?**

From PacifiCorp's perspective, any VRET offering will be designed in response to customer needs, which may include 100 percent renewable resources. In order to ensure that VRET offerings are responsive to customer needs, the Company recommends the Commission not establish a minimum threshold requirement for renewable energy at this time.

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

All of the models identified in the VRET Models Table have the potential to promote further development of significant renewable energy resources. The critical question is not whether the models have this potential (they do), but whether the models are structured in a way that makes them attractive to customers. Customer response will determine the need for additional renewable resources and therefore maintaining flexibility for the utility to respond to customer needs is a paramount issue as the Commission considers VRETs.

III. What may be the Effect on Development of a Competitive Retail Market? (HB 4126 Section 3(3)(b))

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

First, the VRET is intended to increase the market for *renewable* energy, a smaller segment of the overall energy market within the state. In contrast, the competitive retail market that the direct access law was designed to facilitate is a broader construct which makes comparisons between the two difficult and potentially non-informative. Nonetheless, a VRET should be viewed as complementary to the competitive market—whether the larger competitive market or the competitive market for renewable resources—and being able to provide greater flexibility to provide customers options. HB 4126 was passed, in part, to allow utilities to provide these additional options to customers that are not currently being met. Therefore, the key focus for assessing a VRET should remain on the customer and whether the option is meeting a customer need without adversely impacting other customers. In this context, to the extent the utility is in the same competitive market for the acquisition of renewable resources as an ESS, a utility-offered VRET should enhance competitive markets and opportunities for customers and the state. Finally, a VRET is a voluntary offering and, as such, will only be successful if it is competitive with current offerings. This inherent incentive to make the VRET offering competitive helps ensure that a competitive market for these types of renewable products will develop.

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. A VRET should be designed to provide additional opportunities for customers.

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?

The market should be indifferent to who owns the generation as the utility and the IPP are likely to incur the same resource costs.

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?

Through current resource procurement, the utility is already transacting with IPPs to serve customers. Under a VRET, the utility may be in a same role to acquire least cost resources to serve a specific customer or group 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)?

Yes, the VRET models should comport with the requirements of a filed tariff. The tariff may not list exact prices, but instead list parameters for setting the ultimate rate. With regard to an IPP providing confidential pricing data to a regulated utility, the utility will need to know the price in order to bill the customer, nonetheless, the Company would support the use of standards of conduct or non-disclosure agreements acceptable to the Company as a way to address concerns regarding confidentiality, subject to necessary carve outs for disclosure required via regulatory reporting or during regulatory proceedings.

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)?

PacifiCorp takes no position on this question at this time. The VRET offerings should evolve to meet customer demand, therefore flexibility in this model is important.

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?

See the Company's response above. There is no effect or the effect is a larger competitive retail market, which PacifiCorp supports as consistent with the goals of HB 4126.

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?

See the Company's response above. However, the Company notes that customers are currently not prevented from owning or operating renewable resources located behind the meter.

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

Partial requirements service is available where a customer has on-site generation that is behind the meter. A customer-owned resource under a VRET should be limited to off-site generation for which the Company's facilities would be required to theoretically deliver the power to the customer. Any resource behind the meter should be subject to applicable existing Commission approved tariffs.

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])?

Yes. See the response to 3(c) above.

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?

See response above. A customer-owned resource under a VRET should be limited to off-site generation for which the Company's facilities would be required to theoretically deliver the power to the customer. The customer-generator should be treated as a third party supplier. The Company supports adopting standards of conduct to ensure that equal standards and treatment between third party suppliers and VRET customer-generators. If a VRET customer-generator generates more power at an off-site resource than is needed at a given time, the excess power can be sold to a utility under the terms of the Public Utility Regulatory Policy Act of 1978.

Otherwise, the VRET customer-generator cannot sell the excess power to other customers since they do not qualify as utility.

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?

It is premature at this time to determine the interaction between net metering and any VRET offerings. The net metering program is an established program that is separate and distinct from what could be contemplated under a VRET. In particular, PacifiCorp views the VRET as applicable to resources beyond, not behind, the meter.

IV. What may be the Direct or Indirect Impacts on Non-Participating Customers (*issues related to HB 4126 Section 3(3)(c)*)

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?

Transition adjustments and partial requirements tariffs currently exist as potential models. At the time of filing for approval of a VRET, the requesting utility should address how non-participants are not unduly subsidizing 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)?

See the Company's response above.

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?

PacifiCorp anticipates that VRET participants will continue to be subject to the fixed costs for delivery service, consistent with the delivery service costs for non-participating customers. For the fixed costs related to transmission and generation service, PacifiCorp anticipates that VRET customers would continue to be subject to an allocation of these costs for some period of time for any load that is completely or partially served under a VRET. The

period of time for which the VRET customers would likely be subject to these fixed costs will depend on a number of factors and should be addressed in a utility filing seeking approval of a VRET.

- 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)?**

Please see the Company’s responses to I.2 and IV.3. Additionally, to the extent the VRET load is part of total retail electric sales for purposes of determining compliance with the RPS, then VRET customers should continue to pay for the costs of RPS compliance in order to minimize adverse impacts on non-participating customers.

- 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?**

The costs and return on VRET resources will be subject to Commission review as part of the review and approval of bilateral contracts authorized by the VRET tariff. PacifiCorp anticipates that these resources will be separate from the Company’s existing rate base, but does not view potential VRET resources as comprising a separate “VRET rate base.”

- 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?**

This is an issue that should be addressed when and if utility decides to file a tariff and as part of Commission approval. Any VRET load during specified time periods not simultaneously served by a VRET resource should be subject to an applicable Commission approved tariff.

V. Whether VRETs should rely on a Competitive Procurement Process? (*issues related to HB 4126 Section 3(3)(d)*)

- 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?**

PacifiCorp supports requiring utility-owned VRET resources over 100 MW, consistent with the existing competitive bidding guidelines, be developed and supplied through a competitive procurement process. However, for smaller projects, the Company does not see a need for a competitive bidding process. A general principle underlying a VRET is that it is a customer-driven option that a customer will only select if the price for the offering is competitive. Thus, additional Commission oversight to ensure competitive options is not necessary—if the Company cannot provide a competitively-priced options, customers will not sign up for the VRET offering.

- 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?**

See answer to V(1) above.

- 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?**

See answer to V(1) above.

- 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?**

See answer to V(1) above.

VI. Other considerations (*issues related to HB 4126 Section 3(3)(e)*)

- 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?**

PacifiCorp is not aware of any need to change existing customer protections, but continues to support mechanism to ensure protection for non-VRET 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)?

VRET load, either partial or full, will not be included in a utility’s load for purposes of determining levels of retail sales for purposes of the utility’s power mix disclosure. In addition, PacifiCorp notes that how a VRET customer chooses to “claim” their renewable resources for purposes of marketing or other business-related communications is outside the scope of HB 4126.

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

PacifiCorp recommends the Commission take into consideration the competitive business market and potential for economic development when examining whether the VRET is a useful tool for Oregon utilities to offer. To the extent that regulatory policies supportive of increased use of renewable energy and low- or zero-emission generation can harmonize with state economic and business development goals, the Commission should consider these factors as part of its consideration of implementation of a VRET.

Please direct questions regarding this filing to Joelle Steward, Director, Pricing, Cost of Service and Regulatory Operations, at (503) 813-5542 or Erik Andersson, Economic Development Manager, at (503) 813-5117.

Sincerely,


R. Bryce Dalley
Vice President, Regulation

cc: UM 1690 Service List

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Comments on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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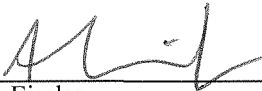
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