

To: Oregon Public Utility Commission  
Attn: Ruchi Sadhir, Senior Policy Advisor  
via email to: [PUC.hearings@state.or.us](mailto:PUC.hearings@state.or.us)

From: Renewable Northwest  
Megan Decker, Chief Counsel

Re: Comments on Revised Draft Issues List and Revised VRET Models Table

Date: August 29, 2014

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Renewable NW appreciates Staff's effort to structure an inclusive, organized Phase I study and looks forward to commenting in future phases of the proceeding. We have limited our remaining comments on the Models Table and Issues List to the following:

- Recommend more general language in 1.b/x: Renewable NW would prefer more general language in 1.b/x. However, *if* Staff does not intend for the language used here to constrain refinement of the details of the concept through the proceeding, then we are comfortable with the description. We do recommend eliminating the word "middleman," which seems a vestige of the mirror-contract role, and instead using the more general phrase "utility facilitates a contract."
- Support Direct Access as comparator: We support inclusion of the Direct Access row as a way to make sure that everyone can reach a common understanding of the similarities and differences between existing opportunities (which are to be addressed in other forums) and new VRET proposals (which are to be addressed directly in this docket).
- Add Question re Renewable Energy: We recommend that Staff add the following Question to Page 1, Section II: "What guidelines or requirements for resource procurement should be adopted within any model to ensure that a VRET offerings promotes 'further development of significant renewable energy resources'?"
- Resource ownership across models: Although we understand that Staff prefers to define the models in terms of resource ownership, we continue to support consideration of the possibility that a single "model" may accommodate more than one type of resource ownership.