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August 29, 2014

Public Utility Commission of Oregon
ATTN: Filing Center
3930 Fairview Industrial DR SE
Salem OR 97308-1088

Re: UM 1690 -- Noble Americas Energy Solutions LLC's Comments

Dear Filing Center:

Please find the comments of Noble Americas Energy Solutions LLC ("Noble Solutions") on Staff's revised VRET models and revised draft issues list. Noble Solutions appreciates the opportunity to provide input into the proposed VRET models and issues related to implementation of H.B. 4126. If you have any questions about this filing, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Greg Adams". The signature is stylized and cursive.

Gregory Adams
Attorney for Noble Americas Energy Solutions LLC

cc: UM 1690 service list (e-mail only)

VRET COLLABORATIVE - COMMENTS OF NOBLE SOLUTIONS

INTRODUCTION

Noble Americas Energy Solutions LLC (“Noble Solutions”) appreciates the opportunity to comment in the Public Utility Commission of Oregon’s (“OPUC”) investigation into a potential voluntary renewable energy tariff (“VRET”). These comments respond to Staff’s request for further input on the current version of the VRET Models Table and the Draft Issues List, circulated by OPUC Staff via e-mail dated August 15, 2014.

COMMENTS ON MODELS TABLE

Staff requested comments on the following topics related to the current draft of the Models Table:

- Do you understand and agree with the descriptions of the basic structure of the remaining models? If needed, please provide additional detail that clarifies the basic structure of remaining models.
- Are there Models that should be studied further through the questions in the issues list?
- Are there Models that should not be studied further through the questions in the issues list?

As explained below, Noble Solutions encourages Staff to revise the descriptions to ensure that the descriptions treat concerns related to cost-shifting and the impact on the competitive market place consistently throughout each individual model. Additionally, Noble Solutions has

no additional models to suggest at this time, but Noble Solutions recommends that the “Hybrid” model (7.) should not be studied further as it is currently proposed.

1. The treatment of potential transition adjustment charges for participating customers should be depicted in a consistent manner across the models.

Two underlying concerns that are germane to the development of a VRET are potential cost-shifting and the impact on the competitive market. H.B. 4126, Section 3(3)(b) and (c), (4). Both of these concerns are duly expressed in the Models Table. However, the depiction of these concerns is not consistent within each of the models. For example, Model (1.x) assumes third-party ownership of the renewable resource and suggests a specific transition adjustment concept where it states in the “clean-pared down” Model Table circulated on August 15, 2014: “Utility could credit customer bill for project output (at credit amount TBD – e.g. utility’s wholesale avoided cost rather than retail rate) and service balance of customer’s energy and capacity need (if any) at cost of service rates.” Noble Solutions believes that this suggested crediting approach closely resembles conceptually the “ongoing valuation” transition adjustment that is used for Oregon direct access customers. *See* OAR 860-038-0005(41), -0140. If it is a proposal to use a transition charge or credit, using identifying nomenclature already in use by the Oregon PUC would be helpful in reducing potential confusion over what each model is proposing.

In contrast, Model (2.) assumes the utility owns and operates the renewable energy resource. In Model (2.) and its variants, no explicit transition adjustment mechanism is suggested. Rather, the matrix simply notes the general concerns about cost-shifting and effects on the competitive market.

A key tenet of any VRET must be that whatever approach is adopted to prevent cost-shifting is non-discriminatory between renewable energy customers that choose a utility provider

and similarly-situated renewable energy customers that choose a competitive provider. That tenet will minimize any potential harmful effects of the VRET on the competitive retail market and non-participating customers. Consistent with this premise, if a specific transition adjustment mechanism is depicted for third-party providers, such as Model (1.x), then the same transition adjustment mechanism should be depicted for the other models, including Model (2.), which assumes the provider is a utility. On the other hand, if it is premature at this stage of the discussion to presume that a specific transition adjustment (or “cost impact mitigation”) mechanism is preferable or appropriate, then it is also premature to do so for *all* models, including the models that assume the renewable energy provider is a competitive third party. In this case, the specific transition adjustment described for Model (1.x) should be deleted and replaced with the general concerns about cost-shifting noted for Model (2.).

It is critical at this stage of the discussion not to depict the models in a manner that presumes that the mechanism for preventing cost-shifting for customers of the utility may be somehow different than the mechanism that would be applied to similarly-situated customers that purchase renewable energy from third party providers.

2. The “Hybrid” model as described in the Models Table is not a bona fide model for a renewable energy *tariff*, but rather appears to be a place holder for open-ended special contract proposals, and should be deleted.

The “Hybrid” model (7.) as described in the “track-pared down” Models Table circulated on August 15, 2014 and discussed at the third workshop appears to be a placeholder for “mixing and matching” components from the other models as well as, Noble suspects, a place for adding proposals that may not be found in the Models Table. This Hybrid model appears to be little more than an open-ended placeholder for a utility to propose special contracts, which would have

a high likelihood of contradicting the goals of achieving consumer protections and protecting competitive retail markets as set forth in H.B. 4126. Because model (7.) is essentially an unspecified model, its non-specificity does not lend itself to evaluation. Noble Solutions is confused as to what aspects of the non-specific proposal are to be retained or included going forward to the next Phase of the Implementation of H.B. 4126. Consequently, it is not helpful to the discussion to carry forward this non-specific option. If a party to the collaborative has a more definitive description of what is intended by this option (e.g., “special contracts on a customer-by-customer basis”), then that party should provide the detail necessary that would allow this option to be understood and evaluated in the same context as the other proposals found in the VRET Models Table. For these reasons, Noble Solutions agrees with Staff’s decision to remove this “Hybrid” model from the “clean-pared down” Models Table circulated on August 15, 2014.

COMMENTS ON DRAFT ISSUES LIST

Staff requested that parties suggest additions, deletions, or edits to the questions contained within the Draft Issues List. Noble Solutions has one suggested edit described below and in the attached redline of the Draft Issues List.

- 1. The eligibility for VRET products should be non-discriminatory between non-residential customers that purchase their renewable energy from the utility and those that prefer to purchase renewable energy from a third-party provider.**

As noted above, a key tenet of the OPUC’s implementation of H.B. 4126 must be that whatever approach is adopted to prevent cost-shifting is non-discriminatory between renewable energy customers that choose a utility provider and similarly-situated renewable energy customers that choose a competitive provider. This comparability principle will protect non-

participating customers and increase the options to the participating customers. Noble Solutions therefore recommends revision to the inquiry under subpart III, in particular to the bolded language set forth below:

- Is the competitive retail market harmed if a regulated utility, affiliate of a utility, or customer is able to offer a VRET product and terms of a VRET product to a non-residential customer that a third party competitive supplier ~~cannot provide~~ **is not permitted to provide under the terms of the current direct access tariffs?**

The initial phrasing allows for the interpretation that the electricity service supplier (“ESS”) cannot provide the renewable product because it is somehow *incapable* of acquiring it economically, as opposed to being *precluded* from providing it under the terms of the direct access (“DA”) tariff (e.g., multi-year deal for a customer below the size threshold).

Examples of products and term limitations currently in the DA programs include:

- Limited Enrollment Periods with Pre-set Deadlines
- Program Participation Caps
- Restricted Access to Standard Tariff Rates
- Customer Obligation to Pay Transition Adjustment(s) and Recurring Recalculation of Transition Adjustments After the Opt-Out Election
- Requirement to Have All Customer Load Served by ESS (i.e. no split load)

The critical question is what impact would the VRET have on the competitive retail market if the competitive suppliers are subjected to these limitations in providing a competitive renewable energy product while a utility may provide a non-competitive renewable product without comparable restrictions.

QUESTIONS RELEVANT TO ALL VRET MODELS

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

- What are the essential features and design options of such a tariff? Would offering more than one type of tariff design help to satisfy diverse customer demands and program goals?
- How would a VRET product be distinguished from products that might already be available or able to be offered through affiliates or direct access?
- Should VRETs be considered for all non-residential customers or only a subset of non-residential customers? If not all, should non-qualifying non-residential customers be permitted to aggregate loads?
- Should a product under a VRET be delivered through an open transmission service in the form of a firm point to point contract, path, or similar mechanism?
- Should there be a goal for new renewable energy capacity or customer load served with incremental new renewable resources under a VRET?
- Should a VRET product provider be entitled to aggregate multiple renewable resources as one VRET product?
- Should there be a cap on the amount of load that can be served under a VRET, and, if so, why? How should the cap be determined?

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

- What constitutes “further development of significant renewable energy resources”?
- Should “further development of significant renewable energy resources” mean buying the direct output from a *new* renewable resource power plant? How do you define *new*? From an *existing* renewable resource power plant? From a *recently constructed* renewable resource power plant (e.g. constructed since the start of the decade)?
- Should “further development of significant renewable energy resources” include buying the direct output and/or bundled RECs from an existing renewable resource power plant? If so, should there be a limit on how old the plant is?
- Should there be geographic limits on the source of eligible renewable energy (e.g. Oregon or the Northwest) to be considered “further development of significant renewable energy resources”?
- How do interactions between the RPS and a VRET influence whether the VRET promotes “further development of significant renewable energy resources”?

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

- Is the competitive retail market harmed if a regulated utility, affiliate of a utility, or customer (?) is able to offer a VRET product and terms of a VRET product to a non-residential customer that a third party competitive supplier is not permitted to provide under the terms of the current direct access tariffs cannot provide?

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

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- How should the Commission ensure that the prices paid for products under a VRET reflect the full cost of providing that service and any requisite back-up/supplementary service without any subsidization from non-participating customers or competitive suppliers (?)?
- How should the fixed costs of the existing rate-based system be allocated if VRET participants are “leaving” the rate-based system? Does it matter if the load to be served by the VRET product is a new or expanded load, not previously served by the utility?
- How should the Commission ensure that non-participating utility customers are protected from cost shifts? Should products under a VRET include transition charges to mitigate potential impacts from cost shifting to non-participating customers? If so, should those transition charges be identical to the charges under the Direct Access programs?
- The above bullets sound somewhat redundant to me now...should be consolidate?
- What VRET design criteria can help limit impacts to non-participating customers? Which designs best limit cost and risk shifting?

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

- Should the Commission limit resource eligibility to renewable energy developed and supplied through a competitive procurement process? If yes, why? If no, how should the Commission evaluate renewable energy supplied through a competitive process?
- Should the PUC’s existing processes for competitive bidding be adapted or used?
- How can a VRET program structure ensure that customers have access to the most competitively priced resources in the market and provide a level playing field for all market participants? What structure gives customers best access to the specific resources that they are interested in procuring?

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

- What would be the impact to RPS resource cost recovery and compliance requirements if a significant amount of VRET load leaves the rate-based system, which includes unrecovered investments in renewable and non-renewable resources? *(HB 4126 Section 3(6))*
- How will utilities and energy generator avoid over-generation issues if there are new renewable resources added to the system? How will those resources be integrated?
- What customer protections may be appropriate for a VRET program (e.g. Green-E certification? Commission or advisory group oversight?)? For which customer classes?
- How will resources developed for and whose environmental attributes are claimed by customers be represented in power mix disclosures to avoid double-claims?
- What other factors, if any, should the Commission consider in determining whether and how utilities should offer VRETs to non-residential customers? Are there other issues that may be pertinent to the study of VRETs in Oregon?

EXISTING DIRECT ACCESS COMPARISON TO POTENTIAL VRET MODELS – ESS CONTRACTS WITH NON-RESIDENTIAL CUSTOMER TO SELL ELECTRICITY SERVICES. ESS SCHEDULES ENERGY TO UTILITY, WHICH DELIVERS THE ENERGY TO THE CUSTOMER THROUGH THE DISTRIBUTION SYSTEM. AN AGGREGATOR MAY COMBINE CUSTOMER LOADS INTO A BUYING GROUP FOR PURCHASE OF ELECTRICITY AND RELATED SERVICES.

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- *Staff added this row at the suggestion of several parties as a backdrop to the VRET models evaluation to provide a comparison between potential VRET models and the existing direct access model – Please suggest specific questions, if you think they would help to compare with VRET Models below.*

MODEL 1(B/X) – Third party owned renewable resource. Regulated Utility is the middleman between a 3rd party and customer(s) that are contracting for renewable energy. Customer and 3rd party negotiate for renewable energy service. Regulated utility takes ownership of power through contract with Third Party. Tariff is set for same price and duration as contract. Contract terminates if customer defaults. Utility remains primary point of contact for billing and (by customer choice) load management/ancillary services. Utility could credit customer bill for project output (at credit amount TBD - e.g. utility's wholesale avoided cost rather than retail rate) and service balance of customer's energy and capacity need (if any) at cost of service rate.

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

- Will this model likely best promote “further development of significant renewable energy resources”?

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

- Should Electricity Service Suppliers (ESS) and Independent Power Producers (IPP) provide renewable energy through a utility as part of a VRET?
- How would the inclusion of ESSes and IPPs as suppliers of renewable energy through a utility under a VRET affect the competitive retail market?
- What should the role of the utility be in developing and offering a product or transacting between customers and an ESS or IPP under VRET?

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

- What are all the utility costs likely associated with this model? How can the Commission ensure that these costs are not shifted to non-participating customers?

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

- Are there other factors the Commission should consider that may be pertinent to this VRET model?
- Is there a market for this model?

MODEL 1(C/D) –THIRD PARTY OWNED RENEWABLE RESOURCE. REGULATED UTILITY OR THIRD PARTY AGGREGATOR MATCHES VRET LOAD(S) WITH AGGREGATE VRET RE GENERATORS TO MITIGATE ISSUES OF TIMING AND RISK. REGULATED UTILITY OR THIRD PARTY AGGREGATOR COULD AGGREGATE CUSTOMERS INTO “VRET LOAD,” PUT THAT AGGREGATED LOAD OUT FOR BID, AND CONTRACT WITH THIRD PARTIES TO SERVE THAT LOAD. AND/OR REGULATED UTILITY OR THIRD PARTY AGGREGATOR COULD AGGREGATE THIRD PARTY RE GENERATORS AND PURCHASE OUTPUT THROUGH FIXED PRICE, LONG TERM CONTRACTS; THE REGULATED UTILITY OFFERS THAT OUTPUT TO THE CUSTOMERS THROUGH A “SUBSCRIPTION” PROCESS.

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

- Will this model likely best promote “further development of significant renewable energy resources”?

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

- Should ESSes and IPPs provide renewable energy through a utility as part of a VRET?
- How would the inclusion of ESSes and IPPs as suppliers of renewable energy through a utility under a VRET affect the competitive retail market?
- What should the role of the utility be in developing and offering a product or transacting between customers and an ESS or IPP under VRET?
- Should a VRET allow a regulated utility to aggregate load(s), creating competition with existing aggregators?
- How does the utility manage the risk and timing of the matched VRET load and/or the obligations to aggregated RE Generators?

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

- What are all the utility costs likely associated with this model? How can the Commission ensure that these costs are not shifted to non-participating customers?

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

- Are there other factors the Commission should consider that may be pertinent to this VRET model?
- Is there a market for this model?

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MODEL 2 – REGULATED UTILITY OWNS AND OPERATES THE RENEWABLE RESOURCE(S) AND DELIVERS POWER TO CUSTOMER. REGULATED UTILITY AND CUSTOMER(S) NEGOTIATE LONG-TERM CONTRACT(S) FOR NON-SYSTEM RENEWABLE ENERGY.

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

- Will this model likely best promote “further development of significant renewable energy resources”?

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

- If a competitive supplier is able to provide the same or similar product under a VRET, should a utility be able to provide such a product? If so, why and under what conditions should a utility be able to provide that product under a VRET?
- If there is a negative effect on the ability of competitive suppliers to operate in Oregon, should the ability to offer products under a VRET be limited to affiliates of Oregon utilities? If not, how should the Commission ensure that competitive suppliers are protected and continue to operate in Oregon?

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

- What are all the utility costs likely associated with this model? How can the Commission ensure that these costs are not shifted to non-participating customers?
- How should the Commission ensure that the utility’s cost of providing VRET service and any requisite back-up/supplementary service is separate from the utility’s existing rate-based system resources? Should the 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?

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

- Is there any room for a competitive procurement process in this model? How should the Commission ensure that a utility-owned resource fairly competes in a competitive procurement process?

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

- Are there other factors the Commission should consider that may be pertinent to this VRET model?
- If a utility is only allowed to offer a VRET product through an affiliate, what rules should govern interaction/communication between the utility and the affiliate?
- Is there a market for this model?

MODEL 2(C/D) – REGULATED UTILITY OWNS AND OPERATES THE RENEWABLE RESOURCE(S), WHICH COULD BE ELIGIBLE TO COMPLETE IN AN RFP FOR SUPPLYING AGGREGATED VRET LOAD (AS DESCRIBED IN MODEL 1(C/D)). REGULATED UTILITY COULD AGGREGATE CUSTOMERS INTO “VRET LOAD,” PUT THAT AGGREGATED LOAD OUT FOR BID, AND CONTRACT TO SERVE THAT LOAD. AND/OR REGULATED UTILITY COULD AGGREGATE THIRD PARTY RE GENERATORS AND PURCHASE OUTPUT THROUGH FIXED PRICE, LONG TERM CONTRACTS; THE REGULATED UTILITY OFFERS THAT OUTPUT TO THE CUSTOMERS THROUGH A “SUBSCRIPTION” PROCESS.

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

- Will this model likely best promote “further development of significant renewable energy resources”?

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

- If a competitive supplier is able to provide the same or similar product under a VRET, should a utility be able to provide such a product? If so, why and under what conditions should a utility be able to provide that product under a VRET?
- If there is a negative effect on the ability of competitive suppliers to operate in Oregon, should the ability to offer products under a VRET be limited to affiliates of Oregon utilities? If not, how should the Commission ensure that competitive suppliers are protected and continue to operate in Oregon?

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

- What are all the utility costs likely associated with this model? How can the Commission ensure that these costs are not shifted to non-participating customers?
- How should the Commission ensure that the utility’s cost of providing VRET service and any requisite back-up/supplementary service is separate from the utility’s existing rate-based system resources? Should the 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?
- Should a VRET allow a regulated utility to aggregate load(s), creating competition with existing aggregators?
- How does the utility manage the risk and timing of the matched VRET load and/or the obligations to the aggregated RE generators?

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

- How should the Commission ensure that a utility-owned resource fairly competes in a competitive procurement process?

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

- Are there other factors the Commission should consider that may be pertinent to this VRET model?
- Is there a market for this model?

MODEL 4(A/X) – CUSTOMER OWNED RENEWABLE RESOURCE. REGULATED UTILITY ROLE DEPENDS ON THE CUSTOMER’S SPECIFIC LOAD AND RESOURCE. COULD INVOLVE DISTRIBUTION AND BACK/SUPPLEMENTAL SERVICES (“FIRMING/SHAPING”). IF CUSTOMER SELF-GENERATES RENEWABLE ENERGY ON SITE, THEN LIKELY REQUIRES OTHER REGULATED UTILITY SERVICES. COULD BE DISTINCT FROM NET-METERING IF REGULATED UTILITY CREDITS CUSTOMER BILL FOR PROJECT OUTPUT (AT CREDIT AMOUNT TBD - THE UTILITY’S WHOLESALE AVOIDED COST RATHER THAN RETAIL RATE) AND SERVES BALANCE OF CUSTOMER’S ENERGY/CAPACITY NEEDS (IF ANY) AT COST OF SERVICE RATES. UTILITY COULD REMAIN PRIMARY POINT OF CONTACT FOR BILLING AND (BY CUSTOMER CHOICE) LOAD MANAGEMENT AND ANCILLARY SERVICES.

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

- Will this model likely best promote “further development of significant renewable energy resources”?

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

- If a customer owned renewable resource is off-site, should it be treated as a third party (similar to **Model 1.b/x (Third Party (IPP, ESS))**)? If not, how should it be treated?
- How would the inclusion of customer-owner off-site renewable resources supplied through a utility under a VRET affect the competitive retail market? What should the role of the utility be in developing and offering a product or transacting like this under a VRET?

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

- What are all the utility costs likely associated with this model? How can the Commission ensure that these costs are not shifted to non-participating customers?

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

- Is there any room for a competitive procurement process in this model? How should the Commission ensure that a customer-owned resource fairly competes in a competitive procurement process?

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

- If a customer owned resource is on-site, should it be part of a VRET or be part of the existing Net Metering program? Does its inclusion in the Net Metering program depend on if any excess energy generation is anticipated? If a customer owned resource is on-site, but operated and managed by the regulated utility, should it be distinguished from the Net Metering program?
- Are there other factors the Commission should consider that may be pertinent to this VRET model?
- Is there a market for this model?

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of August, 2014, a true and correct copy of the within and foregoing **COMMENTS OF NOBLE AMERICAS ENERGY SOLUTIONS LLC, IN DOCKET UM 1690** was served as follows:

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