

The Oregon Department of Energy (ODOE) provides the following general comments in response to Staff's email dated July 3, 2014, requesting initial input from parties in UM 1690 on the proposed Voluntary Renewable Energy Tariff (VRET) Models.

ODOE supports eliminating the examination of the Market-Based (REC Product) 5a (in which the customer purchases unbundled RECs from the market) as part of the VRET Models. This option will not lead to the further development of significant renewable energy due to ability of the customer to already purchase unbundled RECs in this manner.

Rather than suggesting the use of one model prior to conducting the study, ODOE supports using the study to examine several models to understand the potential impacts the differing structures will have on the required statutory considerations including further development of significant renewable energy, effect on development of competitive retail markets, and impacts to non-participating customers. While the Commission can look to other states that have implemented a single VRET model, no other state has published a comparison of the potential impacts of several different models. This provides the Commission with a unique opportunity to inform the industry on how the variations of the proposed models could increase the development of renewable energy.

These comments respectfully submitted June 25 2014, by:

Julie Peacock, Energy Policy Analyst
Oregon Department of Energy
625 Marion St. NE, Salem, OR 97301
503-373-2125
julie.peacock@state.or.us

cc: UM 1690 service list