

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1690

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF)
OREGON)
)
Voluntary Renewable Energy Tariffs for)
Non-Residential Customers)

REPLY COMMENTS OF
THE CITIZENS' UTILITY BOARD OF OREGON

January 9, 2015



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1 CUB appreciates the opportunity to provide additional comments in this docket.

2 Our comments will be brief.

3 We appreciated the range of views and perspectives offered by the first round of
4 comments. What is apparent to us from that range is that there is still no concrete vision
5 about what a VRET might look like in Oregon, even after a year of conversation about it,
6 even after attempting to answer the questions in the very good framework that Staff has
7 created to put some structure around the concept.

8 The schedule for Phase 1 of the VRET process that the Staff has outlined has the
9 possibility for a workshop sometime in February 2015. CUB encourages Staff to organize
10 that workshop to discuss in person the perspectives outlined in the opening comments.
11 CUB would also encourage using the workshop to explore details about the “green
12 tariffs” adopted in other states as presented by World Resources Institute in their
13 comments. While CUB is skeptical as to whether any of those models would meet the
14 legal requirements outlined in the legislation that led to this docket, there may be some

1 use in looking at specific examples of these types of tariffs to see if various pieces can be
2 adapted for use in Oregon.

3 Without another attempt in a workshop to bring some unified clarity to the
4 formation of a VRET, even with responses that will be offered through this round of
5 reply comments, CUB believes that the Commission will have a difficult time
6 determining “whether, and under what conditions, it is reasonable and in the public
7 interest to allow electric companies to provide voluntary renewable energy tariffs to
8 nonresidential customers” as required in statute. The record, to date, does not provide a
9 cohesive argument in favor of “whether” a VRET should be provided nor is it close to
10 defining “under what conditions.” CUB believes that the only way to even hope to meet
11 the statutory requirements for a VRET is to meet again to attempt to isolate a few key
12 areas around which some initial VRETs may be formulated.

13 To expand on that a bit, CUB believes that the workshop discussion should look
14 to develop a narrow base of possibilities that can be used to create a VRET. For instance,
15 at least part of the workshop discussion should explore what is not working or not
16 available within direct access to provide the resources that a VRET might provide.
17 Second, the process should remove, at least for the time being, the possibility of a utility-
18 owned resource being used as the basis for a VRET. CUB believes that a utility-owned
19 resource approach introduces too much complexity into the discussion because of the
20 difficulty of defining how the costs for building and operating a particular resource gets
21 isolated to one customer or group of customers and away from the bulk of customers that
22 the utility serves. Instead, the workshop should explore how the utility can provide
23 services to a potential VRET customer or customers and potential VRET resource

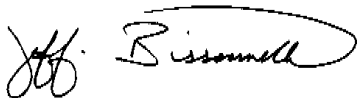
1 providers that can provide actual power along with RECs. Otherwise, we are not beyond
2 just offering REC purchase, which customers can do today. Within that context,
3 examining how the examples in other states are operating could lead us to a concrete
4 vision of what a VRET might look like and how it could operate. We currently fall far
5 short of that basic benchmark.

6 CUB hopes we have the opportunity to meet again as a group to build a workable
7 model. We again appreciate the opportunity to offer comments.

8

Respectfully Submitted,

Jeff Bissonnette

A handwritten signature in black ink that reads "Jeff Bissonnette". The signature is written in a cursive style with a large, sweeping flourish at the end.

Policy Director
Citizens' Utility Board of Oregon

UM 1690 – CERTIFICATE OF SERVICE

I hereby certify that, on this 9th day of January, 2015, I served the foregoing **CUB’s Reply Comments** in docket UM 1690 upon each party listed in the UM 1690 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and three copies by U.S. mail, postage prepaid, to the Commission’s Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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