

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PUBLIC UTILITY)	UM 1690
COMMISSION OF OREGON,)	
)	STATEMENT OF PRINCIPLES OF
Voluntary Renewable Energy Tariffs for Non-)	NOBLE AMERICAS ENERGY
<u>Residential Customers.</u>)	SOLUTIONS LLC

Noble Americas Energy Solutions LLC (“Noble Solutions”) respectfully submits its Statement of Principles for a voluntary renewable energy tariff (“VRET”). Staff of the Public Utility Commission of Oregon (“Commission”) requested that interested parties submit a brief Statement of Principles addressing the following issues: What would make a VRET viable? What would make a VRET unacceptable?

NOBLE SOLUTIONS’S PRINCIPLES

Principle One

If the Commission adopts a VRET, eligible customers must have equal access and terms of delivery to purchase a green product from either the interconnected utility or from an electricity service supplier (“ESS”).

- HB 4126 states that the “Commission shall consider . . . [t]he effect of allowing electric companies to offer voluntary renewable energy tariffs on the development of competitive retail markets.” Section 3(3)(b).
- The customer’s option to purchase a green product must be competitively neutral in regard to applicable enrollment windows, customer eligibility criteria, transition costs, and other delivery and access elements, if any or all are deemed to apply.
- Freedom of choice will increase the renewable energy options for customers and the

likely success of the program from the policy perspective of increasing new renewable energy development.

Principle Two

If the Commission adopts a VRET, the utilities' green product option(s) should be transparent on the tariff rather than a series of special contracts.

- Individual special contracts for a renewable green product can run afoul of the rule against special tariff rates that are too low to the detriment of other customers. ORS 757.230; *Wah Chang v. Pub. Util. Commn.*, 256 Or.App. 151, 301 P.3d 934 (2013).
- Transparency promotes ease of review by customers, the Commission and interested stakeholders.

Principle Three

If the Commission adopts a VRET, it should enable customers to acquire the green product from a renewable source(s) directly.

- This principle promotes the further development of significant renewable energy resources as suggested in HB 4126, Section 3(3)(a).
- This principle is also consistent with other provisions of Oregon law that encourage customers to purchase directly from a wind or solar plant. ORS 757.005(1)(b)(C)(iii); ORS 758.450(2), (4)(c).

DATED this 16th day of June, 2014.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of June, 2014, a true and correct copy of the within and foregoing **STATEMENT OF PRINCIPLES OF NOBLE AMERICAS ENERGY SOLUTIONS LLC, IN DOCKET UM 1690** was served as follows:

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