

The Oregon Department of Energy (ODOE) provides the following comments in response to Staff's email dated June 5, 2014, requesting initial input from parties in UM 1690 on the following questions.

The following issues would make a Voluntary Renewable Energy Tariff (VRET) viable:

Additionality and Traceability

A voluntary renewable energy tariff should result in additional renewable resources beyond the business as usual electricity resource mix of a participating utility. The environmental attributes should transfer directly to the customer. The subscribing company should have fully clarity around source and freshness of the product. This could be in the form of the relevant regional tracking system retirement report.

Renewable Energy Standards

Environmental attributes eligible for the program should be selected by the customer and meet national renewable environmental attribute standards, such as Green-E or the standards established through the Environmental Protection Agency's Green Star program. Environmental attributes should meet state established standards as well, i.e. ORS 469A.025 at minimum.

The following issues would make the VRET unacceptable:

Double Counting

The VRET should be designed to prevent double counting of environmental attributes associated with the bundled renewable energy product.

Additional questions for the draft issues list:

1. Is it appropriate for the VRET to allow customers to request the utility to engage in a power purchase agreement with a specifically identified power producer?
2. What is the appropriate length of customer contracts associated with engaging in a VRET?
3. How will the utility hedge risk of the customer exiting the program prior to the expiration of the contract, especially for larger volume contracts?

These comments respectfully submitted June 16, 2014, by:

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