

John Crider  
Public Utility Commission of Oregon  
201 High Street SE #100  
Salem, Oregon 97301

December 5, 2016

RE: Docket No. ADV 386/Advice No. 16-012

Dear Mr. Crider:

I would like to express the support of 3Degrees Group for PacifiCorp's proposed changes to the Renewable Energy Rider Optional Bulk Purpose Option (Docket No. ADV 386/Advice No. 16-012). 3Degrees provides clean energy solutions that enable organizations and individuals to transition toward a low-carbon economy. We help hundreds of organizations incorporate clean energy into their business operations, through direct access or through their utilities. We connect over 150,000 residential customers with renewable energy through our utility and community solar partnerships. This includes a long standing relationship with PacifiCorp on their Blue Sky program.

Voluntary retail sales of renewable energy represent more than 25% of total U.S. non-hydropower renewable generation. Voluntary demand comes from residential customers who desire cleaner energy than their utility's standard mix, and from businesses looking to meet strong sustainability goals and hedge against the price volatility and regulatory uncertainty of fossil fueled electricity. The voluntary market for renewable power is a vital component of state and national strategies to achieve science-based greenhouse gas emissions targets.

Eighty-three of the largest global corporations have now committed to powering 100% of their operations with renewable energy. Some companies pursue direct transactions of renewable power where allowed in certain markets. Other corporate customers want to work collaboratively with their utilities to achieve clean energy goals. Direct access, even when it is an option as it is in Oregon, is not the right solution for every company. These commercial customers need flexible, voluntary renewable energy options that provide access to bundled energy and Renewable Energy Credits (RECs) through their utility.

Schedule 272, the Renewable Energy Rider Optional Bulk Purpose Option, was designed to provide PacifiCorp the opportunity to meet customers' renewable energy demands above and beyond existing RPS compliance obligations. The marketplace, however, continues to evolve and corporate customers increasingly want more than a generic blend of RECs; some seek to support facilities in their state, and some desire their purchase to be integral to a new and specific project being built. This trend is reflected in the Corporate Renewable Energy Buyers' Principles, a blueprint to guide utilities, suppliers, and regulators toward a shared understanding of what corporations are looking for when buying green power from the grid.

PacifiCorp is responding to the market by updating the language in Schedule 272 to provide qualifying customers with the option to contract for bundled energy or RECs from a specified renewable resource purchased on their behalf. This clarification will enable customers to identify the renewable energy resources they helped provide financial support for, to enhance their marketing of their purchase, and to support facilities in specific communities. This is important to companies in PacifiCorp's service territory. We view it as an important tool for PacifiCorp to retain and attract new customers, especially those for whom direct access is not feasible. It is the simple solution that some companies need. It will make the renewable energy market more robust by allowing some of the largest consumers of energy in the state to align their purchases with their unique goals.

In conclusion, 3Degrees Groups supports PacifiCorp's proposed changes to the Renewable Energy Rider Optional Bulk Purpose Option (Schedule 272).

Signed,



Kristen Sheeran Ph.D.  
Director, Regulatory Affairs  
3Degrees Group