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May 10, 2017

**VIA ELECTRONIC AND U.S. MAIL**

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 1088  
Salem, OR 97308-1088

**Re: Docket UM \_\_\_\_ - Avangrid Renewables, LLC RPS Compliance Report for 2016**

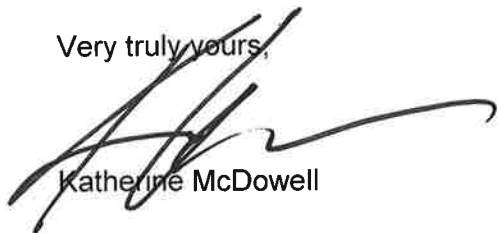
Attention Filing Center:

Avangrid Renewables, LLC submits its Renewable Portfolio Standard Oregon Compliance Report for 2016 and a Motion for Protective Order.

Please note that portions of the report are CONFIDENTIAL, containing commercially sensitive and confidential business information and are provided under seal pursuant to OAR 860-001-0070.

Please contact this office with any questions.

Very truly yours,



Katherine McDowell

Attachments

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM \_\_\_\_\_**

4 In the Matter of

5 AVANGRID RENEWABLES, LLC

6 2016 Renewable Portfolio Standard  
7 Compliance Report

MOTION FOR PROTECTIVE ORDER

8  
9 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Avangrid Renewables, LLC  
10 (“Avangrid” or “Company”) moves the Public Utility Commission of Oregon (“Commission”)   
11 for entry of standard protective order in this proceeding. Good cause exists to issue a  
12 Protective Order to protect commercially sensitive and confidential business information  
13 related to the Company’s filed 2016 Renewable Portfolio Standard Compliance Report  
14 (“RPS”).

15 In support of this Motion, the Company states:

16 1. The Commission’s rules authorize Avangrid to seek reasonable restrictions on  
17 discovery of trade secrets and other confidential business information. *See* 860-001-0080;  
18 ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other  
19 confidential research, development, or commercial information”); *see also In re Investigation*  
20 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500  
21 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a  
22 party to trade secrets and other confidential commercial information” and “to facilitate the  
23 communication of information between litigants”).

24 2. Concurrently with this motion, Avangrid is filing its 2016 Renewable Portfolio  
25 Standard Compliance Report. The report contains confidential material, including  
26

1 commercially sensitive customer load and power pricing information. Public disclosure of the  
2 confidential information could be detrimental to Avangrid and its customers.

3 3. Issuance of a protective order will facilitate the production of relevant information  
4 and expedite the discovery process. *See In re Portland Extended Area Service Region*, Docket  
5 UM 261, Order No. 91-958 (1991).

6 For the foregoing reasons, Avangrid requests entry of a standard Protective Order in  
7 this docket.

8 DATED: May 10, 2017.

McDOWELL RACKNER & GIBSON PC

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10   
Katherine McDowell

11 **AVANGRID RENEWABLES, LLC**

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Attorneys for Avangrid Renewables, LLC

Avangrid Renewables, LLC  
Renewable Portfolio Standard  
Oregon Compliance Report  
2016

*As an introduction and summary of the Compliance Report, answer the following questions:*

Why is Avangrid Renewables submitting a Compliance Report? What information was used as the basis of this Compliance Report?

**Avangrid Renewables, LLC (“AR”) is submitting a Compliance Report due to its registration as an Electric Service Supplier in Oregon for 2016.**

Did the company meet its Renewable Portfolio Standard (RPS) target, and if not, describe in detail why not?

**Yes.**

*Provide the following information in response to the requirements of OAR 860-083-0350:*

OAR 860-083-0350(2)(a): The total number of megawatt-hours sold to retail electricity consumers covered by ORS 469A.052 by the electric company or sold in the service areas of each electric company covered by ORS 469A.052 by the electricity service supplier.

**AR served [REDACTED] of load in 2016.**

OAR 860-083-0350(2)(b): The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired in the compliance year and used to meet the renewable portfolio standard.

**AR utilized [REDACTED] RECs to meet the RPS.**

OAR 860-083-0350(2)(c): The total number renewable energy certificates, identified as either unbundled or bundled certificates, acquired on or before March 31 of the year following the compliance year and used to meet the renewable portfolio standard.

**AR acquired [REDACTED] RECs to meet the RPS.**

OAR 860-083-0350(2)(d): The total number and cost of unbundled renewable energy certificates, identified as either banked or non-banked certificates, used to meet the renewable portfolio standard.

**AR acquired [REDACTED] RECs to meet the RPS at a total cost of [REDACTED]**

OAR 860-083-0350(2)(e): The total number of banked bundled renewable energy certificates that were used to meet the renewable portfolio standard.

[REDACTED]

OAR 860-083-0350(2)(f): The total number of renewable energy certificates, identified as either bundled or unbundled certificates, issued in the compliance year that were banked to serve Oregon electricity consumers.



OAR 860-083-0350(2)(g): For electric companies, unless otherwise provided under subsection (2)(k) of this rule, the total number of renewable energy certificates included in the rates of Oregon retail electricity consumers that were sold since the last compliance report, including:

- (A) The names of the associated generating facilities; and
- (B) For each facility, the year or years the renewable energy certificates were issued.

**Not applicable.**

OAR 860-083-0350(2)(h): Unless otherwise provided under subsection (2)(k) of this rule, for each generating facility associated with the renewable energy certificates included in subsections (2)(b), (c), (f), or (g) of this rule the following information:

- (A) The name of the facility;
- (B) The county and state where the facility is located;
- (C) The type of renewable resource;
- (D) The total nameplate megawatt capacity of the facility;
- (E) For an electric company, the Oregon share of the nameplate megawatt capacity of the facility;
- (F) The year of the first delivery of qualifying electricity or the first year of the contract for the purchase of unbundled renewable energy certificates; and
- (G) The duration of the contract or the amortization period of a facility owned by the electric company or the planned lifetime of a facility owned by the electricity service supplier.

**The following table provides a summary of the sources of the RECs:**

<b>Location</b>	<b>Resource Type</b>	<b>Vintage Year</b>	<b>% of 2016 RPS Compliance</b>
<b>OR</b>	<b>Hydro</b>	<b>2016</b>	<b>100%</b>

OAR 860-083-0350(2)(i): The amount of alternative compliance payments the electric company or electricity service supplier elected to use or was required to use to comply with the applicable renewable portfolio standard.



OAR 860-083-0350(2)(j): For an electric company, sufficient data, documentation, and other information to demonstrate that any voluntary alternative compliance payments were a reasonable compliance method.

**Not applicable.**

OAR 860-083-0350(2)(k): Documentation of use of renewable energy certificates from the system under OAR 330-160-0020 established for compliance with the applicable renewable portfolio standard.

**Please see Attachment A for a report from WREGIS, identifying the RECs that will be retired to meet AR's 2016 RPS compliance obligation upon approval of this filing. The report also identifies the facility as eligible for RPS compliance in Oregon.**

OAR 860-083-0350(2)(l): For each electric company, a detailed explanation of any material deviations from the applicable implementation plan filed under OAR 860-083-0400, as acknowledged by the Commission.

**Not applicable.**

OAR 860-083-0350(2)(m): As specified in OAR 860-083-0100, the total number and cost of bundled renewable energy certificates used for compliance.

**Not applicable.**

OAR 860-083-0350(2)(n): For each electric company, its projected annual revenue requirement as calculated in OAR 860-083-0200 and its total cost of compliance.

**Not applicable.**

OAR 860-083-0350(2)(o): For each electricity service supplier, its total cost of compliance, its average cost of compliance, and its cost limit as specified in OAR 860-083-0300(2), including all calculations.

**AR's incremental cost of**

[REDACTED]

OAR 860-083-0350(2)(p): For each electric company, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in ORS 469A.100(1) is reached for the compliance year.

**Not applicable.**

OAR 860-083-0350(2)(q): For each electricity service supplier, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in OAR 860-083-0300(2) is reached for the compliance year.

**Not applicable.**

OAR 860-083-0350(2)(r): As specified in OAR 860-083-0100, the number and total cost of all bundled renewable energy certificates issued.

[REDACTED]

OAR 860-083-0350(2)(s): As specified in OAR 860-083-0100, the number and total cost of bundled renewable energy certificates issued that are associated with new qualifying electricity since the last compliance report.



OAR 860-083-0350(6): Each electric company subject to ORS 469A052 and each electricity service supplier subject to ORS 469A065 must post on its web site the public portion of the four most recent annual compliance reports required under this rule and provide a copy of the most recent such report to any person upon request. The public portions of the most recent compliance report must be posted within 30 days of the Commission decision in section (5) of this rule. The posting must include any Commission determinations under section (5) of this rule.

**AR will meet the requirements noted by posting the public portion of this report on the Direct Access section of our website (<http://www.avangridrenewables.us/direct-access.html>) within 30 days of the decision.**

OAR 860-083-0350(7): Consistent with Commission orders for disclosure under OAR 860-038-0300, each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must provide information about its compliance report to its customers by bill insert or other Commission-approved method. The information must be provided within 90 days of the Commission decision in section (5) of this rule or coordinated with the next available insert required under OAR 860-038-0300. The information must include the URL address for the compliance reports posted under section (6) of this rule.

**AR will meet the requirements noted by including the information in the next monthly invoice to our customers following the decision.**

**CONFIDENTIAL SUBJECT TO  
OAR 860-001-0070**

ATTACHMENT A: OAR 860-083-0350(2)(K)

**REDACTED**