

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1396

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	INITIAL COMMENTS OF
OREGON)	BIOMASS ONE, L.P.
)	
Determination of Resource Sufficiency Pursuant)	
to Order No. 06-538)	
)	
_____)	


Biomass One, L.P. (“Biomass One”) submits these initial comments regarding the proposed decision outline issued by the Administrative Law Judge in this proceeding on September 29, 2009. Biomass One has reviewed and considered the arguments and positions set forth in the initial comments submitted by The Industrial Customers of Northwest Utilities (“ICNU”) regarding the proposed decision outline and joins in the comments and recommendations of ICNU. In particular, Biomass One agrees with ICNU’s recommendations that: (i) the size threshold for major renewable resources be set at 40 MWs for new plants, and at 15 MWs for projects which are built at or adjacent to existing renewable plants; (ii) the Commission should not base resource sufficiency payments on forecasts of energy alone, but should instead consider setting the resource sufficiency price based on a composite value of those resources the utilities plan to acquire in the IRP for the resource sufficiency period; and (iii) eligible renewable QFs should not be limited to only the Oregon RPS – if a utility is acquiring renewable resources that would meet an RPS requirement in another state in which it

provides service or a Federal RPS, then the renewable QF should be able sell power based on the costs of the renewable resource.

Dated this 15th day of October, 2009.

Respectfully submitted,

STOLL STOLL BERNE LOKTING
& SHLACHTER, P.C.



David A. Lokting
209 SW Oak Street, Suite 500
Portland, OR 97204
E-mail: dlokting@stollberne.com
Telephone: (503) 227-1600

Of Attorneys for Biomass One, L.P.

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing **INITIAL COMMENTS OF BIOMASS ONE, L.P.** on all parties of record as set forth on the Commission's website per the attached service list for UM-1396 by electronic filing. I further certify that I have served the foregoing by U.S. Mail on the following entities which have not waived paper service:

Davison Van Cleve
Irion A. Sanger
333 SW Taylor, Suite 400
Portland, OR 97204

Department of Justice
Michael T. Weirich
Assistant Attorney General
Regulated Utility & Business Section
1162 Court Street NE
Salem, OR 97301-4096

Oregon Public Utility Commission
Ed Durrenberger
PO Box 2148
Salem, OR 97308-2148

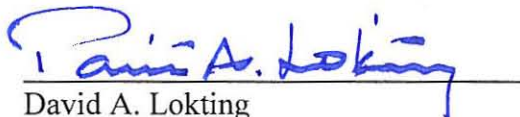
Portland General Electric
Randall Dahlgren
Rates & Regulatory Affairs
121 SW Salmon Street - 1WTC0702
Portland, OR 97204

Portland General Electric Company
J. Richard George
Asst General Counsel
121 SW Salmon Street - 1WTC1301
Portland, OR 97204

RFI Consulting Inc
Randall J. Falkenberg
PMB 362
8343 Roswell Road
Sandy Springs, GA 30350

DATED this 15th day of October, 2009.

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.



David A. Lokting
209 SW Oak Street, Suite 500
Portland, OR 97204
E-mail: dlokting@stollberne.com
Telephone: (503) 227-1600

Of Attorneys for Biomass One, L.P.

{SSBLS Main Documents\5000\002\00223207-1 }



eDockets

Docket Summary

[Return to Search Page](#)

[eFiling](#)

Docket No: UM 1396

Docket Name: INVESTIGATION INTO DETERMINATION OF RESOURCE SUFFICIENCY

[Print Summary](#)

See also: UM 1129

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Investigation into determination of resource sufficiency, pursuant to Order No. 06-538. Filed by Ed Durrenberger. (See Docket No. UM 1129 for electronic version of Order No. 06-538.)

Filing Date: 10/23/2008

Case Manager: ED DURRENBERGER

Phone: (503) 373-1536

Email: ed.durrenberger@state.or.us

Law Judge: PATRICK POWER

Phone:

[Email Service List \(semi-colon delimited\)](#) [Email Service List \(comma delimited\)](#)

If you experience problems with the *above* 'Email Service List' links, please try one of these:

[Service List Popup \(semi-colon delimited\)](#) [Service List Popup \(comma delimited\)](#)

<u>ACTIONS</u>		<u>SERVICE LIST (Parties)</u>		<u>SCHEDULE</u>	
W=Waive Paper service	C=Confidential HC=Highly Confidential			<u>Sort by Last Name</u>	<u>Sort by Company Name</u>
W	*DEPARTMENT OF JUSTICE				
	JANET L PREWITT ASSISTANT AG		NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us		
W	*OREGON DEPARTMENT OF ENERGY				
	KIP PHEIL SENIOR POLICY ANALYST		625 MARION ST NE - STE 1 SALEM OR 97301-3737 kip.pheil@state.or.us		
	VIJAY A SATYAL SENIOR POLICY ANALYST		625 MARION ST NE SALEM OR 97301 vijay.a.satyal@state.or.us		
W	ANNALA, CAREY, BAKER, ET AL., PC				
	WILL K CAREY		PO BOX 325 HOOD RIVER OR 97031 wcarey@hoodriverattorneys.com		
W	CITIZENS' UTILITY BOARD OF OREGON				
	ROBERT JENKS		610 SW BROADWAY STE 308 PORTLAND OR 97205 bob@oregoncub.org		
	G. CATRIONA MCCracken LEGAL COUNSEL/STAFF ATTY		610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org		
W	COMMUNITY RENEWABLE ENERGY ASSOCIATION				
	PAUL R WOODIN EXECUTIVE DIRECTOR		1113 KELLY AVE THE DALLES OR 97058 pwoodin@communityrenewables.org		
	DAVISON VAN CLEVE				

IRION A SANGER
ASSOCIATE ATTORNEY

333 SW TAYLOR - STE 400
PORTLAND OR 97204
ias@dvclaw.com

DEPARTMENT OF JUSTICE

MICHAEL T WEIRICH
ASSISTANT ATTORNEY GENERAL

REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@doj.state.or.us

W IDAHO POWER COMPANY

RANDY ALLPHIN

PO BOX 70
BOISE ID 83707-0070
rallphin@idahopower.com

CHRISTA BEARRY

PO BOX 70
BOISE ID 83707-0070
cbearry@idahopower.com

BARTON L KLINE
SENIOR ATTORNEY

PO BOX 70
BOISE ID 83707-0070
bkline@idahopower.com

MICHAEL YOUNGBLOOD
SENIOR PRICING ANALYST

PO BOX 70
BOISE ID 83707
myoungblood@idahopower.com

W MCDOWELL & RACKNER PC

WENDY MCINDOO
OFFICE MANAGER

520 SW 6TH AVE STE 830
PORTLAND OR 97204
wendy@mcd-law.com

LISA F RACKNER
ATTORNEY

520 SW SIXTH AVENUE STE 830
PORTLAND OR 97204
lisa@mcd-law.com

W OREGON DEPARTMENT OF ENERGY

JEFF KETO

625 MARION ST NE
SALEM OR 97301-3737
jeff.s.keto@state.or.us

ROBIN STRAUGHAN

625 MARION ST NE
SALEM OR 97301-3742
robin.straughan@state.or.us

OREGON PUBLIC UTILITY COMMISSION

ED DURRENBERGER

PO BOX 2148
SALEM OR 97308-2148
ed.durrenberger@state.or.us

W PACIFIC POWER & LIGHT

JORDAN A WHITE
SENIOR COUNSEL

825 NE MULTNOMAH STE 1800
PORTLAND OR 97232
jordan.white@pacificcorp.com

W PACIFICORP, DBA PACIFIC POWER

PACIFIC POWER OREGON DOCKETS

825 NE MULTNOMAH STREET, STE 2000
PORTLAND OR 97232
oregondockets@pacificcorp.com

PORTLAND GENERAL ELECTRIC

RANDALL DAHLGREN
RATES & REGULATORY AFFAIRS

121 SW SALMON ST - 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

PORTLAND GENERAL ELECTRIC COMPANY

J RICHARD GEORGE
ASST GENERAL COUNSEL

121 SW SALMON ST 1WTC1301
PORTLAND OR 97204
richard.george@pgn.com

RFI CONSULTING INC

RANDALL J FALKENBERG

PMB 362
8343 ROSWELL RD
SANDY SPRINGS GA 30350
consultrfi@aol.com

W

RICHARDSON & O'LEARY PLLC

PETER J RICHARDSON

PO BOX 7218
BOISE ID 83707
peter@richardsonandoleary.com

W

**THOMAS H NELSON ATTORNEY AT
LAW**

THOMAS H NELSON

PO BOX 1211
WELCHES OR 97067-1211
nelson@thnelson.com;
jravenesanmarcos@yahoo.com