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September 28, 2016

Public Utilities Commission of Oregon
Filing Center
POB 1088
Salem, OR 97308-1088
Puc.filingcenter@state.or.us

RE: UM 1790 PacifiCorp, dba Pacific Power 2017-2021 Renewable Portfolio
Standard Implementation Plan

Attention Filing Center:

Small Business Utility Advocates ("SBUA") submits these Comments in the above-referenced matter. We are available for any questions.

Please contact me with any questions.

Sincerely,

Diane Henkels
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Counsel for SBUA
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Portland, OR 97204
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t: 541-270-6001

Enclosure

Cc: UM 1790 Service list

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1790

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER)
) COMMENTS OF SMALL BUSINESS
2017-2021 Renewable Portfolio Standard) UTILITY ADVOCATES
)
Implementation Plan)
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SBUA appreciates the Renewable Portfolio Standard Implementation Plan (“Plan”) submitted by PacifiCorp dba Pacific Power (“Company”) as laid out addressing the criteria. SBUA had filed written support for the original House bill supporting what became the SB 1547 while also voicing concerns that Oregon ratepayers risk paying unfairly for, and not benefitting equitably from, electricity generated out of state.¹ Also, SBUA provided comment to UM 1754 the first RPS Implementation Plan filed by the Company after passage of SB 1547. Exhibit 1.² SBUA suggests this Plan could be clearer and more specifically address the costs, such as transmission including as this cost is incorporated in the cost of RECs, that the statute enables the Company to recover from ratepayers. Unlike at least one other electric utility serving a large share of Oregon

¹ <https://olis.leg.state.or.us/liz/2016R1/Downloads/CommitteeMeetingDocument/84953>

² SBUA Comments available at <http://edocs.puc.state.or.us/efdocs/HAC/um1754hac82346.pdf>

customers, the Pacific Power bill does not clearly identify the cost of transmission for the business consumer. Exhibit 2.³

PacifiCorp dba Pacific Power is the electric utility for customers in dispersed geographical parts of Oregon including approximately 19,000 small nonresidential ratepayers in southern Oregon and another approximately 9,000 in Mid-Willamette Valley. Exhibit 3. Given this geography, SBUA comments that this Plan does not show certain costs, such as transmission even as contained in cost of RECs, yet the statute explicitly enables the utility to recover from ratepayers the cost of transmission, and other costs associated with transmission and delivery of qualifying electricity to retail electricity consumers, ORS 469A.120(1) and (2).

The cost of transmission is required for RECs. The Plan is required to include estimated costs of meeting the annual targets such as cost of transmission and the cost of acquiring renewable energy certificates, among other costs. ORS 469A.075 (2)(b). To review information for these comments SBUA requested information re transmission costs in the rates and the Company stated that the incremental costs from Table 3 of the filing are calculated according to OAR 860-083-0100 and Order 12-272 in Docket UM 1570 and pursuant to those rules do not account for transmission costs. Exhibit 4, SBUA Data Request 1.4 and PacifiCorp Response. SBUA agrees that Order 12-272 does not mention transmission costs, but the Order does refer to ORS 469A.075 which does mention these costs. Also, the cost of bundled RECs, because it is based on incremental cost, appears to include cost of transmission: “Cost of bundled renewable energy certificates” means the levelized incremental cost of the qualifying electricity associated with the bundled renewable energy certificate. OAR 860-083-0010 (12).

³ Given the small font print, easier view is perhaps through accessing Pacific Power’s explanation of the Business power bill found at: <https://www.pacificpower.net/ya/kyb/ryb1.html>

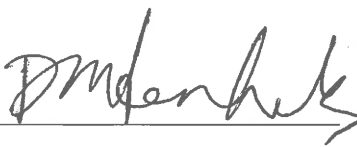
Of geographic relevance to this Plan and these comments is that among other generation resources providing RECs, the Company's Plan includes two out-of-state projects, Pioneer Wind in Wyoming and Pavant Solar in Utah. Plan, Table 3, and Confidential Attachment C page 2. At least one project, Pavant, was not included in the Integrated Resource Plan, which is per the Plan a material difference. Plan, p 15. Learning the transmission costs, even of the RECs would communicate more clearly the Plan costs under this 2016 statute.

Also helpful would be an explanation of the relation between RPS compliance and the Multi State Process Protocol mentioned in ICNU's Comments page 5.

In conclusion, SBUA appreciates the information provided in the Plan, and also any complexity of planning process to implement the new statute. The 2016 legislation explicitly added language "at a minimum" regarding the contents of an implementation plan, SB 1547, Section 6, and that the Statute automatic adjustment clause allows recovery of "costs related to" transmission. Id. Section 11(2)(a). SBUA suggests that the Plan include more information regarding regarding the different specified costs which ratepayers would be required to pay.

Respectfully submitted.

September 28, 2016,



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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1754

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	
)	SMALL BUSINESS UTILITY
2017-2021 Renewable Portfolio Standard)	ADVOCATES' COMMENTS
)	
Implementation Plan)	

SBUA appreciates the opportunity to submit comments regarding PacifiCorp’s Oregon Renewable Portfolio Standard (“RPS”) Implementation Plan 2017-2021 OAR 860-083-0400 Compliance Filing (“Plan”) submitted as required by January 1, 2016. SBUA has demonstrated in at least one other docket the impacts of renewable energy projects on small business.¹ Impact is both direct where a business is involved in developing the energy and indirect where the business provides support and other services in the locality.

SBUA intervenes in this docket to review PacifiCorp’s Plan on behalf of small business and to offer comments. As stated in the Petition to Intervene, SBUA membership includes PacifiCorp d.b.a. Pacific Power customers including those with Schedule 23 electric service using <31 kW. Comparatively, it appears from the 2014 General Rate Case stipulated that general service customers, including Schedules 23 and 28, numbered approximately 84,000 customers, required 3,100,000 MWh, slightly more electricity than the industrial customers, Schedule 48, represented in that docket.² And it appears that the smaller commercial customers, Schedules 23 and 28, may have experienced a greater proportional rate hike in 2014, at 2.4% and 2.35% respectively, than other customer classes. Id. The larger number of smaller commercial customers and their corresponding electricity requirements support a strong interest in achieving for smaller commercial utility customers effective Renewable Portfolio Standard implementation within Oregon, particularly if these customers are paying a higher percent rate.

Given this background and mindful of the delay in filing these comments, SBUA offers four points:

1. Regarding OAR 860-083-0400(2)(a), according to PacifiCorp RPS Planning filing requirements OAR 860-083-0400, the annual megawatt-hour target for compliance is 15% in 2017 or 1,918,995 MWh, and 20% by 2021, or 2,566,252. These numbers are comparable to the com-

¹ UM 1610 <http://apps.puc.state.or.us/edockets/docket.asp?DocketID=17718>

² UE 263 <http://edocs.puc.state.or.us/efdocs/HAR/ue263har83528.pdf>, Table A-1



binned number provided above of Schedule 23 and 28 customers. While it is not required under these rules, SBUA would be interested to learn how many sales of Blue Sky and other renewable energy purchase programs are made generally and also to small commercial customers at what retail rates.

2. Regarding the Integrated Resource Plan (“IRP”) as it relates to this planning per OAR 860-083-0400(6)³:

(a) SBUA understands that the utility’s IRP is pending before the Commission. Figure 7.20 on IRP page 63 shows increasing Oregon load 2015-2033, though not clear in which customer categories. Figure 7.7 p 149 seems to indicate a doubling of wholesale electricity prices even without including 111(d). Small nonresidential customers stand to pay substantially increased rates regardless of RPS compliance. SBUA would be interested in learning of correlations existing between RPS and rate spread, for example, according to changes in load.

(b) Oregon-based PacifiCorp customers risk paying for benefits enjoyed out of state. The 2015 IRP p 19 indicates that with the Energy Imbalance Market, the market immediately began generating benefits for customers with significant economic transfers to California occurring throughout the month of November and December with volumes exceeding 150,000 MWh. It also showed that near-term procurement activities focused on three areas: natural gas supply and transportation, the purchase and sale of shale, natural gas, coal, none of which are in Oregon and all are in neighboring states. Small business seems to risk paying electricity that is produced out of state and sending any business related to this electricity production out of state. Of relevance is that SBUA members include residential and commercial construction, food and dining, cleaning services, small business support services and office space, and community renewable energy, so the impact of procuring electricity from out of state is experienced more by small commercial, such as Schedule 23 customers.

(c) Regarding the rate impact from RPS requirements, SBUA notes that it would appreciate being able to utilize paid expert assistance to interpret IRP information such as that found in Figure 8.18: Figure 8.18 Customer Rate Impacts Benchmarked to Case C05a-3 as it pertains to the RPS.

(e) The risk to consumer rates seems higher given increased RPS where, as stated in the 2015 IRP, in developing resource portfolios for the 2015 IRP, PacifiCorp includes estimated transmission integration and transmission reinforcement costs specific to each resource portfolio. These costs are influenced by the type, timing, and location of new resources as well as any assumed resource retirements, as applicable, in any given portfolio. As stated in the Oregon Senate Business and Transportation Committee Hearing on 2/22/16, most PacifiCorp resources are located in

³ SBUA bases comments on the PacifiCorp IRP accessed at:
http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2015IRP/PacifiCorp_2015IRP-Vol1-MainDocument.pdf

states w/greater coal deposits and the map demonstrates greater transmission build out in these areas. One way to demonstrate a mitigation of this risk is to include in its list of projects used to meet its RPS, the projects based in Oregon, and also the different community-based projects. As focused planning and compliance documents, the RPS Planning documents seem to be natural contexts to present the extent to which Oregon goal under 469A.210 of 8% community-based renewables is met or not.

To conclude, SBUA is fortunate to work in a state where public and private sector endeavor together to decrease risks posed by fossil-fuel generated electricity. It is hoped that these comments provide some perspective of how some in the small commercial sector see this RPS Compliance plan, and how this plan can be useful to interested ratepayers.

Respectfully submitted,

/s/ Diane Henkels

Date: 2/24/16

Diane Henkels, Of Counsel
Cleantech Law Partners PC
Counsel for Small Business Utility Advocates

Reading Your Commercial Bill

Review different sections of your Pacific Power bill below for information about common charges, billing terms and other details. (This is a sample bill, actual details will vary.)

PACIFIC POWER PAGE 1 OF 2

ABC COMPANY
1234 MAIN ST
PORTLAND OR 97201-1234

1 Inquiries? Call your Business Solutions Team
and have 1-800-879-3419, M-F, 8am-6pm PT
www.pacificpower.net

6 BILLING DATE: Nov 8, 2011
ACCOUNT NUMBER: 12345678-001 0
DATE DUE: Nov 30, 2011
AMOUNT DUE: \$2,914.90

2 Your Balance With Us
Previous Account Balance 1,828.67
Payments/Credits 1,828.67
New Charges +2,914.90
Current Account Balance \$2,914.90

Payments Received
DATE: 11/08/11
AMOUNT: 1,828.67
Oct 22, 2011 Payment Received - Thank You 1,828.67
Total Payments \$ 1,828.67

7 Historical Data: 11/1/11
Bar chart showing energy usage over the last 12 months.

3 Detailed Account Activity
ITEM 1 ELECTRIC SERVICE Street Address City State
General Service Oregon Rates & Service Schedule 28
Service ID: 12345678-002

DATE	TYPE	PERIOD	START	END	UNIT	RATE	AMOUNT	REMARKS
11/24/11	Gen Svc	Nov 7, 2011	31	11/20/11	11480	40 D	27,120 kWh	
11/24/11	Demand	Nov 7, 2011			2,128	40 D	81 kWh	

4 Basic Charge - 2P Sec Delivery 92 kWh 28.00
Load Sens Charge - 2P Sec Del 92 kWh 60.00
Demand Charge Sec - Mer 15 Min 85 kWh 4,360.0000 373.15
Delivery Charge Secondary 22,120 kWh 0.001900 420.82
Oregon Tax Charge 22,120 kWh 0.001180 26.10
Supply Energy Sec - 20750 kWh 20,300 kWh 0.055200 1,121.04
Supply Energy Sec - 20000 kWh 2,120 kWh 0.053700 112.85
Public Purpose 0.000000 50.56
Energy Conservation Charge 22,120 kWh 0.001700 37.60
Low Income Assistance 22,120 kWh 0.005000 110.60
J.C. Boyle Econ Recovery Surchg 22,120 kWh 0.003300 7.30

5 12345 account number on street & mail to Pacific Power, 1033 NE 8th Ave, Portland, OR 97258-0001
PG Box 25388
Salt Lake City UT 84125

8 Kilowatt-hours - Current meter read, less prior meter read, times meter multiplier, equals the total kilowatt-hours consumed during the billing period.

9 Demand (kilowatts) - Current meter demand read times meter multiplier equals the kilowatt demand reading for the billing period. High demand is usually associated with equipment start-up, which requires higher energy use than routine operations.

10 The Oregon Public Utility Commission approved an increase to the low income assistance charge, effective Oct. 5, 2011. Your bill may reflect service under both old and new rates. For energy-saving tips visit pacificpower.net/retailmail

Want to help your neighbors? If you missed this notice? Use the enclosed envelope to make a tax-deductible donation.

Local Payment Charge for Oregon
A late payment charge of 4.7% may be charged on any balance not paid in full each month.

Change of Address or Phone?
Check box and provide information at back.

Account Number: 12345678-001 0
Card Due: Nov 30, 2011
AMOUNT DUE: \$2,914.90

Please enter the amount enclosed
Questions about your bill:
1-800-879-3419

1 Your Business Solutions Team phone number – Call our experts for energy answers.

2 Account balance – Your current bill is the sum of your electricity charges and optional charges.

3 Services dates – Dates and number of days included in the billing period.

4 Current monthly charges – A few charges and terms are defined below.

See more details on charges and terms for your state »

5 Detachable portion of bill – Mail this stub with your payment in the envelope provided. It shows your payment due date, the amount you owe and provides a place to indicate the amount you paid. When mailing, please ensure our address shows through the return window.

6 Your Pacific Power account number

7 Energy use comparison chart – This chart can help your conservation efforts by showing how much energy you used during the current month compared to the past 12 months. It also shows an average temperature comparison.

8 Kilowatt-hours – Current meter read, less prior meter read, times meter multiplier, equals the total kilowatt-hours consumed during the billing period.

9 Demand (kilowatts) – Current meter demand read times meter multiplier equals the kilowatt demand reading for the billing period. High demand is usually associated with equipment start-up, which requires higher energy use than routine operations.

10 Information and special offers

UM 1790 / PacifiCorp
September 9, 2016
SBUA Data Request 1.3

SBUA Data Request 1.3

Please describe where the cost of transmission is factored into a Schedule 23 Pacific Power bill. In describing please refer to the webpage:

<https://www.pacificpower.net/ya/kyb/ryb1.html>

and the tariff as described in:

[https://www.pacificpower.net/content/dam/pacific_power/doc/About Us/Rates Regulation/Oregon/Approved Tariffs/Rate Schedules/General Service Small Nonresidential Delivery Service.pdf](https://www.pacificpower.net/content/dam/pacific_power/doc/About_Us/Rates_Regulation/Oregon/Approved_Tariffs/Rate_Schedules/General_Service_Small_Nonresidential_Delivery_Service.pdf)

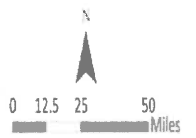
Response to SBUA Data Request 1.3

FERC Transmission costs are recovered from Schedule 23 customers through the Transmission and Ancillary Services Charge rate in Schedule 23. All other transmission costs are classified as distribution costs and are recovered as part of the Distribution Charge rates in Schedule 23.

The Transmission and Ancillary Services Charge rate in Schedule 23 is collected through the 'Delivery Charge' rate on the customer's bill. The Distribution Basic Charge is recovered through the 'Basic Charge' on the customer's bill. The Distribution Load Size Charge is recovered through the 'Load Size Chg' on the customer's bill. The Distribution Demand Charge is recovered through the 'Demand Charge' on the customer's bill. The Distribution Energy Charge is recovered through the 'Delivery Charge' on the customer's bill. The Distribution Reactive Power Charge is recovered through the 'Reactive Power Charge' on the customer's bill.

Allocated Boundary Pacific Power State of Oregon

-  Allocated Boundary
-  State Boundary



GIS SUPPORT SERVICES
Solutions Group
gsoset@pacifiCorp.com

Data is projected in
UTM Zone 10, NAD83, meters.

PacifiCorp makes no representations or warranties as to the accuracy, completeness or fitness for a particular purpose with respect to the information contained in this map. PacifiCorp shall have no responsibility or liability to any person or entity resulting from the use of any information furnished in this map.

Please refer to table below for Schedule 23 customers, as of September 1, 2016, located by Oregon county.

OR County	Schedule 23 Customers
BENTON	2,901
CLATSOP	2,864
COOS	2,584
CROOK	814
DESCHUTES	6,982
DOUGLAS	4,341
GILLIAM	133
HOOD RIVER	931
JACKSON	7,994
JEFFERSON	835
JOSEPHINE	3,472
KLAMATH	3,738
LAKE	329
LANE	957
LINCOLN	1,159
LINN	4,401
MARION	881
MORROW	75
MULTNOMAH	7,055
POLK	1,133
SHERMAN	180
TILLAMOOK	10
UMATILLA	2,067
WALLOWA	701
WASCO	67
Total	56,604

UM 1790 / PacifiCorp
September 9, 2016
SBUA Data Request 1.4

SBUA Data Request 1.4

Please explain how transmission costs of Pioneer Wind wind project in Wyoming and Pavant Solar project in Utah will factor into billings for Oregon Schedule 23 customers, where incremental costs of these generating resources are included in Table 3 of the Implementation Plan filing.

Response to SBUA Data Request 1.4

The incremental costs from Table 3 of the filing are calculated in accordance with Oregon Administrative Rules (OAR) 860-083-0100 and Order No. 12-272 in Docket UM 1570 and pursuant to those rules do not account for transmission costs.

The costs and benefits associated with power purchase agreements (PPA) such as Pioneer Wind and Pavant Solar are reflected in Schedule 201: Net Power Costs (NPC) Cost-Based Supply Service. The incremental costs reported in Table 3 are not used in the development of Schedule 201.

