

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 28, 2014

REGULAR _____ CONSENT X EFFECTIVE DATE October 28, 2014

DATE: October 17, 2014

TO: Public Utility Commission

FROM: John Crider *JC*

THROUGH: Jason Eisdorfer and Aster Adams *aa*

SUBJECT: NOBLE AMERICAS ENERGY SOLUTIONS: (Docket No. UM 1697)
2013 Renewable Portfolio Standard Compliance Report.

STAFF RECOMMENDATION:

Staff recommends that, based upon the Noble Americas Energy Solutions (Noble) 2013 Renewable Portfolio Standard (RPS) Compliance Report, the Commission find that Noble complied with the RPS for the 2013 compliance period.

DISCUSSION:

Noble filed its 2013 RPS Compliance Report (Report) on May 30, 2014. The Report indicates that Noble complied with Oregon's RPS, which states that for the calendar year 2013, at least five percent of the electricity sold by a large utility to retail electricity consumers must come from qualifying resources.¹

OAR 860-083-0300(2)(a) defines the compliance cost limit for an Electric Service Supplier (ESS) as four percent of the weighted average of the average retail revenues per megawatt-hour (MWh) of the electric companies in whose service areas the ESS sells electricity. The Report shows that Noble's cost of compliance per MWh for 2013 was below this limit.

¹ Electric Service Suppliers (ESS) must meet the RPS requirements applicable to the electric utilities that serve the territories in which the ESS sells electricity to retail customers. See ORS 469A.065.

Conclusion

Staff finds that Noble's 2013 Report demonstrates that it complied with the RPS by the purchase and planned retirement of unbundled RECs equivalent to five percent of the electricity that Noble sold to retail electricity consumers.

Staff also finds that Noble's 2013 RPS Compliance Report shows that its cost of compliance per MWh is below the four percent limit set forth at OAR 860-083-0300(2) and ORS 469A.100. Noble addressed the concerns of RNP and CUB regarding the public reporting of aggregate REC characteristics such as resource type, location, vintage year, and percentage of total RECs. Staff recommends that this aggregate data be included in the public version of future reports.

PROPOSED COMMISSION MOTION:

- (1) Noble Americas Energy Solutions be found to comply with Oregon's Renewable Portfolio Standard during the 2013 compliance period;
- (2) Noble Americas Energy Solutions be directed to retire the RECs identified in its Compliance Report², and to provide a Western Renewable Energy Generation Information System (WREGIS) retirement report to the Commission, subject to appropriate non-disclosure agreements, within 30 calendar days of this Order.

Noble 2013 RPS Compliance Report

² In Staff's Comments submitted on August 15, 2014, Staff inadvertently indicated that Noble had already retired the RECs at issue. For clarity, RECs should be retired per the terms of the Commission order adopting Staff's proposed motion.