

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1953**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Investigation into Proposed Green Tariff.

CLOSING BRIEF OF  
RENEWABLE NORTHWEST

**CLOSING BRIEF OF RENEWABLE NORTHWEST**

Renewable Northwest is grateful to the Public Utility Commission of Oregon (the “Commission”) for this opportunity to submit our Closing Brief in Commission Docket UM 1953 regarding the green tariff program proposed by Portland General Electric Company (“PGE”). Following review of other parties’ briefs, Renewable Northwest again encourages the Commission to approve PGE’s green tariff proposal.

In addition to recommending approval of PGE’s green tariff proposal, our Opening Brief explained: that while we support approval of PGE’s proposal, including Phase I, further investigation in Phase II is necessary to develop an accurate capacity credit; that it is important for PGE’s green tariff program to retire all RECs associated with meeting the load of green tariff subscribers on behalf of the subscribers; that the proposed program could contribute to achieving climate goals; and that there is significant customer demand for this type of product. In this Closing Brief, we add only our recommendation that the question of whether to allow a floating-credit structure be left open for consideration during PGE’s proposed Phase II of this docket. We are concerned that parties’ opposition to the floating-credit concept may overstate the

potential for cost shifting to the detriment of cost-of-service customers, while failing to account adequately for the statutory mandate that “[a]ll costs *and benefits* associated with a voluntary renewable energy tariff shall be borne by the nonresidential customer receiving service under the voluntary renewable energy tariff.”<sup>1</sup> Only by exploring the floating-credit concept more fully can the Commission ensure that it strikes the correct balance between protecting cost-of-service customers and establishing an attractive green-tariff product that “promotes the further development of significant renewable energy resources”<sup>2</sup> and accelerates Oregon’s transition to a lower-emissions grid.

For the reasons set forth above and in our Opening Brief, Renewable Northwest respectfully requests that the Commission approve PGE’s green tariff proposal.

Dated this 21st day of December, 2018

Respectfully submitted,

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<sup>1</sup> HB 4126, Section 3(4) (emphasis added).

<sup>2</sup> *Id.*, Section 3(3)(a).