

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1953**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Investigation into Proposed Green Tariff.

PHASE II  
CLOSING BRIEF OF  
RENEWABLE NORTHWEST

**PHASE II 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 Phase II of 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 adopt the voluntary renewable energy tariff (“VRET”) program updates we recommended in our opening brief.

Specifically, our Opening Brief explained (among other things): that an annual reporting requirement regarding VRETS and Direct Access could help address concerns about the interactions between the two programs; that the decarbonization goals in Governor Brown’s Executive Order 20-04 and robust customer demand justify expanding PGE’s program cap from 300 MW to 500 MW; that HB 4126’s prohibition on cost-shifting requires utilities to include uncertain benefits as well as costs in the methodology for determining any risk adjustment fee; that the climate imperative and customer demand support establishing a streamlined process for

future program cap increases; and that Oregon law and policy support allowing hybrid renewable-plus-storage projects to serve VRET subscribers.

Finally, we specifically point out, as we have in each of our briefs in this docket, that Oregon climate policy, climate science, and customer demand all counsel in favor of a robust, expanded green tariff program statewide that will “promote[] the further development of significant renewable energy resources”<sup>1</sup> and accelerate Oregon’s transition to a lower-emissions grid. Indeed, the key question presented in HB 4126 is “whether, and under what conditions, it is reasonable and in the public interest to allow electric companies to provide voluntary renewable energy tariffs to nonresidential customers,”<sup>2</sup> and EO 20-04 helps answer that question as follows: “[i]t is in the interest of utility customers and the public generally for the utility sector to take actions that result in the rapid reduction of GHG emissions, at reasonable costs, to levels consistent with the GHG emission goals set forth in [this EO], including transitioning to clean energy resources.”<sup>3</sup> VRETs are an important means of facilitating that energy transition and reducing Oregon’s greenhouse gas emissions, and we accordingly request that the Commission adopt the VRET program updates we recommended in our opening brief.

Dated this 13th day of November, 2020.

Respectfully submitted,

/s/ Max Greene

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<sup>1</sup> HB 4126, Section 3(3)(a).

<sup>2</sup> *Id.*, Section 3.

<sup>3</sup> EO 20-04 at Section 5(A).