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November 13, 2018

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
Investigation into Proposed Green Tariff
Docket No. UM 1953

Dear Filing Center:

Please find enclosed the Cross-Examination Exhibits of the Alliance of Western Energy Consumers (“AWEC”) in the above-referenced docket. AWEC has conferred with the Oregon Public Utilities Commission Staff (“Staff”) and understands that Staff is willing to stipulate to the admission of AWEC’s cross-examination exhibits.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1953

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) CROSS-EXAMINATION EXHIBITS OF
COMPANY,) THE ALLIANCE OF WESTERN
) ENERGY CONSUMERS
)
Investigation into Proposed Green Tariff.)
_____)

Pursuant to the Administrative Law Judge’s Ruling dated October 11, 2018, the Alliance of Western Energy Consumers (“AWEC”) submits the following cross-examination exhibits for the Oregon Public Utility Commission Staff (“Staff”) in the above-referenced docket.

<u>Cross-Examination Exhibit</u>	<u>Description</u>
AWEC/300	Staff Response to AWEC Data Request No. 1
AWEC/301	Staff Response to AWEC Data Request No. 2

AWEC has conferred with Staff and understands that Staff is willing to stipulate to the admission of the above-referenced exhibits.

Dated this 13th day of November, 2018

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the

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UM 1953 – PUC Response to AWEC’s First Set of Data Request
Page 1

Date: November 8, 2018

TO:

TYLER C. PEPPLÉ
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JESSE O. GORSUCH
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FROM: Scott Gibbens
Senior Economist
Energy Rates, Finance and Audit Division

OREGON PUBLIC UTILITY COMMISSION
Docket No. UM 1953 Data Response to AWEC filed on October 26, 2018

Data Request No 001:

001 Reference Staff/200, Gibbens/11, lines 9-11. Mr. Gibbens identifies a floating credit option in which the benefits of a credit that reduced a green tariff participant’s cost of service rate would be shared with other cost of service customers. Does Staff also envision in this circumstance that the costs of a credit that increase the green tariff participant’s cost of service rate would also be shared with other cost of service customers? Why or why not?

Staff Response No 001:

001 No. It is not Staff’s recommendation that a sharing mechanism would operate to allow the sharing of costs of a credit that increase the green tariff participant’s rate. The proposal to include a sharing mechanism was meant to recognize the legislature’s apparent policy to promote direct access and the development of competitive suppliers and the fact that the utility is entering into system PPAs to support this program outside of an integrated resource plan or competitive bidding process. Staff’s proposal was an attempt to provide the Commission with an option that would allow the participant to enjoy some of the benefits of an economically favorable PPA as part of a VRET program, but also recognize that such a program cannot contradict the legislature’s policy direction with direct access, and should not contradict the Commission’s resource acquisition processes. Staff’s proposed alternative would account for any unintended consequences of a green tariff program given the intersection between remaining ratepayers and direct access customers.

UM 1953 – PUC Response to AWEC’s First Set of Data Request
Page 1

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FROM: Scott Gibbens
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OREGON PUBLIC UTILITY COMMISSION
Docket No. UM 1953 Data Response to AWEC filed on October 26, 2018

Data Request No 002:

002 Reference Staff/200, Gibbens/15, lines 16-18. Please provide further explanation of Staff’s recommendation that the Commission “include a time to review the performance of the green tariff program once it has been in operation for a few years.” For instance, assume a green tariff customer commits to a 15-year PPA, but three years after the green tariff program has been implemented the Commission undertakes Staff’s proposed review and determines to discontinue the program. What does Staff envision would happen to this customer and the PPA?

Staff Response No 002:

002 Staff’s comment was in regard to the pricing methodology selected for the program, and was not intended to be a recommendation that the Commission review the existence of the program, generally, after a few years. Staff’s suggestion for a review was to allow parties to examine the way the credit pricing is performing.