



In the context of renewable energy, a megawatt hour from a power source cannot be “renewable” if the environmental attribute – the REC – is not bundled with that power. If a REC is unbundled from the power, that power source is considered to be “null power” and assumes the attributes of the average emissions of the electricity grid. For example, if power from PGE’s Biglow Canyon Wind Farm was sold to PGE customers in 2009 and PGE used, or retired, the equivalent amount of RECs from the Biglow Canyon Wind Farm in the same year, (i.e. bundling the power with the RECs), that power source is renewable energy and should be disclosed as such in 2009 bill inserts. Conversely, if the RECs are unbundled from the Biglow Canyon Wind Farm in 2010, the power does not retain the environmental attributes and cannot be disclosed to customers as renewable energy in 2010.

For a REC to be banked, which is essentially the REC being stored for future use, the REC must be unbundled from the power. Therefore, the power source from which the banked REC originated is no longer renewable energy and cannot be disclosed as such. The value of the REC – the environmental attributes of the power - cannot be claimed until the owner of the banked REC uses, or retires, that REC. As a result, a utility that owns a banked REC cannot claim ownership of the environmental attributes associated with the REC until the REC is used (retired) for RPS compliance or sold. To do otherwise would be to claim the value of the REC in multiple years and in multiple venues, which is double-counting that value.<sup>1</sup>

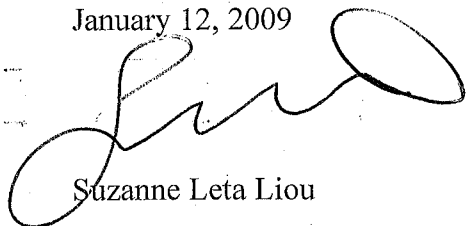
In summary, the PUC Staff’s proposal to only allow a banked REC to be used for power source disclosures in the year it has been used for RPS compliance will ensure that customers have accurate information regarding the environmental attributes of the power serving them in any given year. The PUC Staff’s proposal is essential to preventing utilities from double counting the value of a REC and misleading consumers.

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<sup>1</sup> The Green-e Energy National Standard states “eligible RECs or renewable energy can be used once and only once...Examples of prohibited use include...2) When the same REC is claimed by more than one party, including any expressed or implied environmental claims made pursuant to electricity coming from a renewable energy resource, environmental labeling or disclosure requirements.” 12/5/2008.

Respectfully Submitted,

January 12, 2009

A handwritten signature in black ink, appearing to read 'Suzanne Leta Liou', written in a cursive style with a large loop at the end.

Suzanne Leta Liou

Senior Policy Advocate

## AR 518 CERTIFICATE OF SERVICE

I hereby certify that, on this 12<sup>th</sup> day of January 2009, I served the foregoing SUPPLEMENTAL COMMENTS OF THE RENEWABLE NORTHWEST PROJECT upon the Commission by email and by sending an original and 1 copy by U.S. mail, postage prepaid, to the Commission's Salem offices. The persons whose names appear on the AR 518 service list were served by email only since it is RNP's understanding that official paper service is not required in this docket.

**(W) Denotes waiver of paper service**

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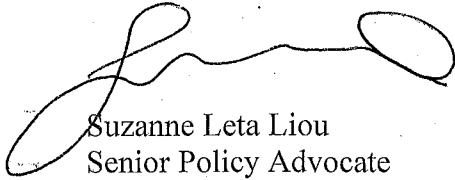
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