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***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
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Attention: Vikie Bailey-Goggins
Administrator, Regulatory Operations

Re: **Docket AR 518** – Phase II
PacifiCorp's Comments

PacifiCorp, d.b.a. Pacific Power, hereby submits its Comments in the above-referenced matter.

Questions on this filing may be directed to Joelle Steward, Regulatory Manager, at (503) 813-5542.

Sincerely,


Andrea L. Kelly
Vice President, Regulation

Enclosure

Cc: AR 518 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 518 – Phase II

In the Matter of a Rulemaking to
Implement SB 838 Relating to Renewable
Portfolio Standard

COMMENTS OF PACIFICORP

PacifiCorp d/b/a Pacific Power (the “Company”) submits the following comments regarding the Oregon Public Utility Commission Staff’s (the “Staff”) proposed rules in Phase II of the proceeding. For Phase II, Staff has proposed rules to clarify renewable energy certificates (“RECs”) that may be used to meet the Renewable Portfolio Standard (“RPS”), including amendments to existing OAR 860-038-0220 and 860-038-0300 on reporting environmental claims, renewable energy portfolio options and the Oregon RPS. Pacific Power supports the proposed rule adding OAR 860-038-0220(10), and the amendment to OAR 860-038-0300(10) revising the filing date to June 1 each year. As noted in Staff’s Comments filed January 7, 2009, these amendments align the timelines and reporting on portfolio options with the timelines and reporting required under the Oregon Renewable Energy Act (the “Act”).

Pacific Power respectfully disagrees with aspects of the new rules proposed as new OAR 860-083-0005 and 860-083-0050, as well as the amendment to OAR 860-038-0300(10) requiring documentation under OAR 330-160-0020 for power source disclosure. As described by Staff, these rules would allow a utility or electric service supplier to use a REC to comply with both the RPS and power source disclosures required by OAR 860-038-0300, only if both uses occur in the same calendar compliance year. That is, a REC banked for future RPS compliance could be included in power source disclosures only for the year the REC is used for RPS compliance.

While Pacific Power supports the intent of power source disclosure requirements, the Company submits that Staff’s proposed rules are: (1) not provided for in the Act, are not within Staff’s authority to adopt, and are contrary to the intent of the Act by introducing a new “use,” and associated limitation, for banked RECs in the context of RPS compliance, and (2) in any event, inconsistent with the principles of power source disclosure requirements and fail to ensure that customers will be provided clear and concise price, power source, and environmental impact information necessary for informed choice about utility resources. Pacific Power was actively involved in the negotiations of the Act and supported and advocated for the adoption of the Act before the Oregon Legislature. As the Commission is aware, the Act is a carefully crafted measure designed to ensure that Oregon residents benefit from renewable energy in a cost-effective manner. Staff’s proposed rules should represent this objective by reflecting the intent of the Act, which includes not imposing unnecessary use limitations on the banking of RECs that may ultimately lead to customer confusion over utility renewable generation.

A. Staff’s proposed rules relating to the use, or limitation, of RECs are not provided for in the Act, are not within the Commission’s authority to adopt, and are contrary to the intent of the Act.

In this rulemaking, the Commission attempts to clarify how certain applications of RECs (i.e. banking) may be incorporated as part of the power source disclosure requirements. Specifically, the proposed rule defines “[t]o use a renewable energy certificate” to include “power source disclosure reporting under OAR 860-038-0300(8).” *See* Proposed OAR 860-083-0005(3)(d). The proposed rule further states that an electric company “may use a renewable energy certificate to comply with both a renewable portfolio standard and with the power source disclosures required by OAR 860-038-0300 ... only if both such uses occur in the same calendar compliance year” and that, if a renewable energy certificate has been included in the power source disclosure, it “is not eligible to become a banked renewable energy certificate” even if it has not been used to satisfy the RPS requirements. *See* Proposed Rule OAR 860-083-0050(3) and (4). The Staff’s proposal is contrary to the Act, which contains no such restriction upon the use of RECs to satisfy the RPS. Indeed, Staff’s proposal undermines the express intent of the banking provisions of the Act.

As an administrative agency, the Commission only has that authority delegated to it by the Legislature. Staff relies, in part, on its authority under ORS 757.659(3) to implement these rules. Pacific Power appreciates the Commission’s general authority to adopt power source disclosure requirements, but it must do so in a manner that is consistent with intent and mandates of the Act it seeks to implement. In this instance, Staff seeks – by its own volition and without statutory authority under the Act – to apply a standard used in power source disclosure requirements in the context of RPS compliance. In doing so, Staff has created a new restriction upon the use of RECs that is not provided for in the Act, not within Staff’s authority to adopt, and contrary to the intent of the Act.¹

The Act does not authorize the Commission to determine what constitutes a “use,” or to otherwise limit the use of banked RECs in the context of RPS compliance, much less in the context of power source disclosure requirements. The Act has already made those determinations by establishing a comprehensive framework for the use of RECs, both unbundled and bundled. *See* ORS 469A.135, .140, and .145. The Act does not in any manner bestow upon Staff the authority to promulgate new “uses” for banked RECs, or otherwise issue rules seeking to modify the disposition of RECs authorized under the Act.

In addition to Staff’s lack of authority to promulgate the proposed rules, the Act never contemplates that the “use” of a REC would be determined by reporting under OAR 860-038-0300, or in any other context but for compliance with the RPS. First, ORS 469A.140(1) and (2) explicitly state that a REC may be “traded, sold or otherwise transferred” and that “[r]enewable energy certificates that are not used by an electric utility or electricity service supplier to comply

¹ To the extent Staff seeks to rely on ORS 469A.150 for statutory authorization in this rulemaking, the intent of this provision relates narrowly to the development of a “process for allocating” the use of RECs among multiple state jurisdictions, and does not contemplate a determination on specific uses of RECs, particularly in the context of power source disclosure requirements. *See* ORS § 469A.150.

with a renewable portfolio standard in a calendar year may be banked and carried forward indefinitely for the purpose of complying with a renewable portfolio standard in a subsequent year.” This plain language clearly describes the “use” of a REC under the Act. Staff’s comments noting that “if an electric company or ESS relies upon a REC in its OAR 860-038-0300 reporting, that REC cannot be banked for later use” is contrary to this explicit language. Staff’s Comments at 3. Under the Act, a utility may bank a REC only if it has not previously been *traded, sold, or otherwise transferred*.

Second, the Act provides a comprehensive framework authorizing and routinely describing the use of RECs for the sole purpose of complying with a *renewable portfolio standard*, and not for power source disclosure purposes. For instance, in ORS 469A.005, a “banked renewable energy certificate” is defined as a “bundled or unbundled renewable energy certificate that is not used by an electric utility or electricity service supplier *to comply with a renewable portfolio standard* in a calendar year ...”. (Emphasis Added).² ORS 469A.140(3), which Staff relies on, in part, for justifying “use” of a REC as relating to power source disclosures, also incorporates the concept under the Act that RECs are only used “to comply with a renewable portfolio standard”.³ Simply stated, in describing the use of RECs, the Act in each instance references compliance with a renewable portfolio standard and never refers to power source disclosure requirements.

Finally, Staff’s proposed rules have the effect of creating multiple uses for RECs, which are not authorized under the Act. The Act explicitly considers multiple uses of RECs by allowing the limited use of RECs for meeting both state and federal requirements and disallowing multiple uses where the REC is used to comply with more than one state. *See* ORS 469A.140(4). However, the Act does not speak to the multiple uses of RECs in the context of RPS compliance and power source disclosure requirements. Presumably, had the Legislature intended for such uses, it would have explicitly stated so.

Given the comprehensive framework established in the Act relating to the treatment of RECs, Staff’s proposed rule is not well-founded in the Act, contrary to the Act’s intent, and beyond the scope of the Commission’s authority. Accordingly, Pacific Power proposes the following amendments to Staff’s proposed rules:

860-083-0005

Scope and Applicability of Renewable Portfolio Standards Rules

(1) OAR 860-083-0005 through 860-083-0050 (the “Renewable Portfolio Standards rules”) establish rules governing implementation of Renewable Portfolio Standards for electric companies and electricity service suppliers provided under ORS 469A.005 through 469A.210.

² *See also* ORS 469A.135(1), (2) and (3).

³ ORS 469A.140(3) states that “An electric utility or electricity service supplier is responsible for demonstrating that a renewable energy certificate *used to comply with a renewable portfolio standard* is derived from a renewable energy source and that the utility or supplier has not used, traded, sold or otherwise transferred the certificate.” (Emphasis added).

(2) For good cause shown, a person may request the Commission waive any of the Renewable Portfolio Standards rules.

(3) As used in OAR 860-083-0050:

(a) "Electric company" has the meaning given that term in ORS 757.600.

(b) "Electricity service supplier" has the meaning given that term in ORS 757.600.

(c) "Renewable energy certificate" has the meaning given that term in OAR 330-150-0015(8).

~~(d) "To use a renewable energy certificate" means to employ, or exercise the rights to, a renewable energy certificate to meet or comply with a legal requirement in Oregon or in any other state, including, but not limited to, power source disclosure reporting under OAR 860-038-0300(8) (effective September 3, 2008).~~

860-083-0050

Renewable Energy Certificates Eligible for Compliance With a Renewable Portfolio Standard

An electric company or an electricity service supplier may use a renewable energy certificate to comply with a renewable portfolio standard contained in ORS 469A.052, 469A.055, or 469A.065 in a calendar year as follows:

(1) The electric company or electricity service supplier has not previously used ~~traded~~, sold or otherwise transferred the renewable energy certificate;

(2) The electric company has not previously used the renewable energy certificate to comply with requirements set forth in its own tariff that is in effect in Oregon or in another state, that are not related to an ORS 469A renewable portfolio standard or similar standard in another state;

~~(3) The electric company or electricity service supplier may use a renewable energy certificate to comply with both an ORS 469A renewable portfolio standard and with the power source disclosures required by OAR 860-038-0300 only if both such uses occur in the same calendar compliance year including renewable energy certificates issued or acquired on or before March 31 for the preceding calendar year as set forth in ORS 469A.070(2);~~

(4) A renewable energy certificate that has been used ~~traded, sold or otherwise transferred~~ is not eligible to become a banked renewable energy certificate; and

(5) The renewable energy certificate complies with OAR 330-160-0005 through OAR 330-160-0030 (effective September 3, 2008).

860-038-0300

Electric Company and Electricity Service Suppliers Labeling Requirements

(10) ~~Beginning April 1, 2003, and on April 1st thereafter~~ **On June 1st** for the prior calendar year, each electric company, and each ESS making any claim other than net system power mix, must file a reconciliation report on forms prescribed by the Commission. The report must provide a comparison of the fuel mix and emissions of all of the seller's certificates, purchase or generation with the claimed fuel mix and emissions of all of the seller's products and sales. ~~The report must include documentation from the system under OAR 330-160-0020 (effective September 3, 2008) established for compliance with a renewable portfolio standard contained in ORS 469A.052, 469A.055 or 469A.065.~~

B. In any event, Staff's proposed rules are inconsistent with the principles of power source disclosure requirements and fail to ensure that customers will be provided clear and concise price, power source, and environmental impact information necessary for informed choice.

The purpose of the power source disclosure rule is to provide customers information that will allow them to “exercise informed choice” under the direct access law. *See* OAR 860-038-0300(1). Additionally, the spirit and purpose behind the rule is to protect customers from potential deception that could come from environmental attributes being misappropriated. Pacific Power agrees with the Commission’s position, articulated by Staff in its January 7, 2009 comments, that the information provided in the power source disclosure label represents “a statement by the electric company or ESS that the power sources shown were actually used to meet consumer consumption.” However, Pacific Power does not believe that Staff’s proposed rules will support or facilitate the distribution of clear and concise information to customers about price, power sources and environmental information and does not further an interest in protecting customers from deceptive practices. Instead, the proposed rule will lead to increased customer confusion and will not serve customer interests under the intended purpose of OAR 860-038-0300.

After Staff first presented its proposed rule linking the power source disclosure to the RPS in January 2008, Pacific Power initiated a working group of interested parties including Staff, the Citizens’ Utility Board, Portland General Electric, Oregon Department of Energy and the Renewable Northwest Project to develop new disclosure label information that would work with the RPS to be tested in customer focus groups. Pacific Power initiated the working group and focus groups because it was concerned that not being able to show renewable energy during a year in which the RECs were banked for future RPS compliance would be confusing to customers in that they would not see that the Company was acquiring new renewable energy resources over time while during the same period seeing rate increases associated with new renewable energy resources. The objective of the label information and the focus groups was to, among other things, evaluate the effectiveness of an approach to explaining the RPS and RECs to customers and to assess the strengths and weaknesses of alternatives for presenting and labeling the energy supply mix.

As the Company worked through the issues with the working group, the possible power source label solutions centered on informing customers about the RPS, RECs and banking. Ultimately, the label options tested were not liked by the customers participating in the focus groups. Customers found the information on the RPS, RECs and banking to be too long, complicated and lacking relevance to customers. Nevertheless, the Company did gain a better understanding from customers on what information they would find relevant and useful in the power source disclosure labels.

The focus groups indicated that customers prefer power source disclosures that demonstrate the *growth* of generated renewable energy *over time*. The focus groups reflected the fact that customers were interested in learning how Pacific Power will meet the goals of the RPS and the subsequent impacts on the electricity rates. Customers appeared to be most interested in the amount of renewable generation Pacific Power is *currently generating* to meet RPS compliance goals, rather than the nuances of banking RECs. It should be noted that the added expenses of generating renewable energy will be reflected in customer rates in the year in which the electricity is actually generated, including through the recently implemented Renewable Adjustment Clause. Based on this feedback, Pacific Power believes that power source disclosures should include renewable resource generation, regardless of whether the REC is banked for future compliance purposes, as it allows customers to view the growth of renewable energy generation over time in the Company's basic service power supply mix and to better understand the source of rate increases.⁴ Pacific Power believes that this type of information serves the intent of the power source disclosure rule of providing customers information that allows them to make an informed choice for the power options authorized under the direct access law.

Under Staff's proposed rules, Pacific Power would be required to subtract from its power source disclosures energy generated from renewable resources prior to 2011, but banked for future RPS compliance. This would deprive customers of an adequate illustration of the actual growth of renewable energy generation over time — renewable energy generation that customers are paying for in real-time. Indeed, as an example, the power source disclosures would illustrate ostensibly zero generation from renewable resources in the years prior to 2011 and dramatically inflated renewable resource generation in 2011 by virtue of inclusion of the banked RECs in the first year of compliance under the Act. Arguably, a power source disclosure program of this nature would be deceptive to customers, since the power source disclosures would imply that the amount of renewable resource generation disclosed in 2011 was suddenly able to be generated concurrently.

The Act itself includes several provisions designed to ensure transparent disclosure of the use of RECs. For instance, the Act required the Department of Energy ("DOE") to establish a system of RECs that can be used to establish compliance, which expressly cited the Western

⁴ In its January 7, 2009 comments, Staff states that it understands that PGE and PacifiCorp have not included in power source disclosures RECs the companies intend to bank toward future RPS compliance. For Pacific Power, this is correct only in so far as that banking is allowed beginning in 2007. Due to the continued uncertainty surrounding the power source disclosure label given Staff's proposed rule, the Company has not included 2007 power source information in the labels most recently sent to customers. Moreover, Pacific Power agrees with Staff that RECs that have been sold or otherwise transferred will continue to be excluded from renewable energy claims in the power source disclosures.

Renewable Energy Generation Information System (“WREGIS”). As noted in Staff’s Comments dated January 7, 2009, DOE established WREGIS as the system to be used for issuing, monitoring, accounting for and transferring RECs. Additionally, the Act requires utilities to make an annual compliance report to the Commission wherein the utility must detail compliance, or failure to comply, with the RPS in the compliance year. *See* ORS § 469A.170. Among other things, the compliance report will include the relative amounts of RECs, including banked RECs. *Id.* These reporting and verification methods are the appropriate mechanisms to ensure transparency with regard to the use of RECs. Power source disclosure requirements serve a different purpose focused on what is actually being generated by the utility to serve customers.

When considering the totality of the circumstances, Pacific Power recommends that the Commission expressly not adopt Staff’s proposed rule language which establishes the power source disclosure as a “use” under the Act, and proposes that interested parties continue to work together to formulate a proper format for power source disclosures. The Commission already has the authority to prescribe a format for power source disclosures pursuant to OAR 860-038-0300. For Pacific Power, the Company respectfully requests the Commission allow it to include in its power source disclosures renewable electricity associated with banked RECs, so long as there is a clear and prominent footnote attached that clarifies that the RECs may be banked for future RPS compliance and directs customers to a website for further information. On the website, customers interested in learning more would be supplied with information explaining the RPS and how RECs can be used to comply with the RPS. Such a disclosure should eliminate any remaining risk of deception to customers.

Furthermore, the proposed disclosure footnote would continue to be used even after RPS compliance begins in 2011. Prior to 2011, the footnote would disclose that Pacific Power may bank the RECs associated with renewable generation for future compliance. After 2011, the footnote would be modified to explain that RPS compliance is partially met using banked RECs. Pacific Power’s proposed example is as follows:

Pre-RPS (2011):

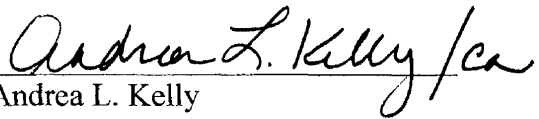
Pacific Power may save the environmental attributes ("Renewable Energy Credits" or "green tags") associated with the eligible renewable energy (wind, biomass and some hydro) in our Basic Service resource mix to comply with Oregon's Renewable Portfolio Standard beginning in 2011. For more information on this, please go to [website].

Post-RPS (2011):

Pacific Power has complied with Oregon’s Renewable Portfolio Standard for [year] by using the "Renewable Energy Credits" or "green tags" associated with the eligible renewable energy (wind, biomass and some hydro) generated in prior years and not shown here. For more information on this, please go to [website].

Pacific Power appreciates the opportunity to comment on the proposed rules.

Dated at Portland, Oregon, this 12th day of January 2009


Andrea L. Kelly
Vice President, Regulation

CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing **PacifiCorp's Comments** in OPUC Docket No. AR 518 by electronic mail and first class mail to the parties on the attached service list.

Date this 12th day of January, 2009.

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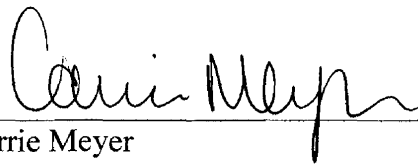
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