

JOHN W. STEPHENS
Email: STEPHENS@ESLERSTEPHENS.COM
DIRECT DIAL: (503) 935-5393

December 12, 2008

Via Electronic and First Class Mail

Filing Center
Public Utility Commission
P.O. Box 2148
Salem, Oregon 97308-2148

Re: Open an investigation into electric companies providing Qualified Reporting Entity services for certification of renewable energy certificates by the Western Renewable Energy Generation Information System, PUC Docket No. UM 1394—
Opening Comments of the Renewable Northwest Project

Dear Filing Center:

Enclosed please find an original and one copy of Opening Comments of the Renewable Northwest Project (“RNP”). Thank you for your courtesies.

Yours truly,

/s/ John W. Stephens

John W. Stephens

JWS/mec
cc: Service List
Enclosures

K:\Maureen\RNP\UM 1394\PUC 2 ltr.doc

**Renewable
Northwest
Project**

917 SW Oak, Suite 303
Portland, OR 97205

Phone: 503.223.4544
Fax: 503.223.4554
www.RNP.org

Members

- 3Degrees
- 3TIER
- American Wind Energy Association
- BP Alternative Energy
- Bonneville Environmental Foundation
- Center for Energy Efficiency and Renewable Technologies
- CH2M Hill
- Citizens' Utility Board
- Clipper Windpower
- Columbia Energy Partners
- Columbia Gorge Community College
- David Evans & Associates
- Environment Oregon
- Environment Washington
- enXco, Inc.
- Eurus Energy America
- Everpower Renewables
- FPL Energy, Inc.
- Geothermal Resources Council
- GE Energy
- Green Mountain Energy
- Horizon Wind Energy
- Jones Stevedoring
- Montana Environmental Information Center
- MontPIRG
- Natural Resources Defense Council
- NW Energy Coalition
- Northwest Environmental Advocates
- OSPIRG
- Port of Vancouver, USA
- PPM Energy, Inc.
- Portland Energy Conservation, Inc.
- REC Silicon
- RES America Developments, Inc.
- Solar Oregon
- Stoel Rives, LLP
- Tonkon Torp LLP
- Vestas American Wind Technology, Inc.
- Warm Springs Power & Water Enterprises
- Washington Environmental Council
- WashPIRG
- Western Resource Advocates
- Western Wind Power



Renewable Northwest Project

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1394

In the Matter of)	
)	
THE PUBLIC UTILITY COMMISSION)	Opening Comments
OF OREGON)	of the Renewable
)	Northwest Project
)	
Open an investigation into electric)	
companies providing Qualified)	
Reporting Entity services for certification)	
of renewable energy certificates by the)	
Western Renewable Energy Generation)	
Information System)	

The Renewable Northwest Project (RNP) submits these brief opening comments consistent with the Administrative Law Judge’s Ruling on December 2 modifying the schedule. These comments are not structured in response to each of the specific questions in the Revised Joint Issues List. Instead, at this point, RNP is providing general input on the broader issues in the docket.

RNP believes that utilities are in the best position to provide Qualified Reporting Entity (QRE) service for generators located both in their service territory and/or within their Balancing Authority control area. RNP supports the Commission requiring Oregon utilities to provide QRE service to generators over 360 kW upon request. However, this is not an issue unique to Oregon or for which Oregon utilities can alone solve the problem. The Bonneville Power Administration (BPA) and the California Independent System Operator (Cal ISO) already offer QRE service without charge to generators within their balancing authority. The Commission should follow their lead in this docket and set a regional precedent. RNP pledges to address this issue with other utilities and Commissions in Washington, Montana and Idaho.

Since the Western Renewable Energy Generation Information System (WREGIS) does not have the capability to directly acquire generating data from generation units, a QRE is needed to upload such data on a monthly basis. Such metering data in many cases is already available to utilities, streamlining their ability to provide QRE service. We acknowledge there may be situations where the utility does not have access to the needed data (e.g., Issue 1.c., possibly where the generator is not interconnected to the utility’s distribution or transmission system).

For generators themselves to be a QRE, they must show FERC functional separation and small generators may have difficulty doing so. If they can make this showing, the cost of becoming a QRE themselves may be prohibitive for a generator. Without utilities providing QRE service, most generators would likely need to hire a third-party QRE service provider, again incurring additional costs.

RNP recognizes that the utilities have provided some initial information about the costs of providing QRE service. But we believe more information is needed, particularly about the incremental cost of providing QRE service, to determine what, if any, costs should be borne by the generators.

In summary, utilities are in the best position to provide QRE service and should do so for any generators within their service territory or balancing authority control area that request this service of them. Streamlining provision of QRE service should increase REC certification with WREGIS, making more RECs available for voluntary and compliance markets.

Thank you for consideration of these comments. We look forward to reviewing the other comments filed this week and providing additional input in January.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **OPENING COMMENTS OF THE RENEWABLE NORTHWEST PROJECT** on the following persons on December 12, 2008, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

PacifiCorp Power Oregon Dockets
oregondockets@pacificorp.com
825 N.E. Multnomah, Suite 2000
Portland, Oregon 97232

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Melinda J. Davidson, Esq.
mjd@dvclaw.com
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Michael T. Weirich
michael.weirich@doj.state.or.us
Assistant AG
Department of Justice
Reg Utility & Business Section
1162 Court Street N.E.
Salem, Oregon 97301-4096

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Lisa C. Schwartz
lisa.c.schwartz@state.or.us
Senior Analyst
Public Utility Commission of Oregon
P.O. Box 2148
Salem, Oregon 97308-2148

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Ann English Gravatt
ann@rnp.org
Katie Kalinowski
katie@rnp.org
Renewable Northwest Project
917 S.W. Oak, Suite 303
Portland, Oregon 97205

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Randall J. Falkenberg
consultrfi@aol.com
RFI Consulting, Inc.
PMB 362
8343 Roswell Road
Sandy Springs, Georgia 30350

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Debra Malin, Esq.
djmalin@bpa.gov
Bonneville Power Administration
905 N.E. 11th Avenue
Portland, Oregon 97208

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

J. Courtney Olive, Esq.
jcolive@bpa.gov
Bonneville Power Administration
905 N.E. 11th Avenue
Portland, Oregon 97208

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Jeremy Weinstein, Esq.
jeremy.weinstein@pacificorp.com
Pacific Power & Light
1512 Bonanza Street
Walnut Creek, California 94596

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Jordan White
jordan.white@pacificorp.com
Pacific Power & Light
825 N.W. Multnomah, Suite 1800
Portland, Oregon 97232

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Randall Dahlgren
pge.opuc.filings@pgn.com
Portland General Electric
121 S.W. Salmon, 1WTC 0702
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

J. Richard George, Esq.
richard.george@pgn.com
Portland General Electric
121 S.W. Salmon, 1WTC 1301
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Kevin Kitz
kkitz@usgeothermal.com
Shauna Pratt
spratt@usgeothermal.com
US Geothermal
1505 Tyrell Lane
Boise, Idaho 83706

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Jesse D. Ratcliffe, Esq.
Assistant Attorney General
1162 Court Street N.E.
Salem, Oregon 97301-4096

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

G. Catriona McCracken, Esq.
catriona@oregoncub.org
Robert Jenks
bob@oregoncub.org
Citizens' Utility Board of Oregon
610 S.W. Broadway, Suite 308
Portland, Oregon 97205

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Gary Marcus
garymarcus1@aol.com
Diane Moore
dmoore@frontier-technology.com
Falls Creek HP, LP
PO Box 359
Eugene, Oregon 97440

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Kevin Lynch
kevin.lynch@iberdrolausa.com
Toan-Hao Nguyen
toan.nguyen@iberdrolausa.com
Carrie Plemons
carrie.plemons@iberdrolausa.com
Iberdrola Renewables, Inc.
1125 N.W. Couch, Suite 700
Portland, Oregon 97209

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Barton L. Kline, Esq.
bkline@idahopower.com
Randy Allphin
rallphin@idahopower.com
Christa Bearry
cbearry@idahopower.com
Mike Youngblood
myoungblood@idahopower.com
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707-0070

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Lisa F. Rackner, Esq.
lisa@mcd-law.com
Adam Lowney
adam@mcd-law.com
Wendy McIndoo
wendy@mcd-law.com
McDowell & Rackner, P.C.
520 S.W. Sixth Avenue, Suite 820
Portland, Oregon 97204

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Kip Pheil
kip.pheil@state.or.us
Vijay A. Satyal
vijay.a.satyal@state.or.us
Oregon Department of Energy
625 Marion Street N.E., Suite 1
Salem, Oregon 97301-3737

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Peter J. Richardson
peter@richardsonandoleary.com
Richardson & O'Leary, PLLC
P.O. Box 7218
Boise, Idaho 83707

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Will K. Carey
wcarey@hoodriverattorneys.com
Annala Carey Baker et al.
P.O. Box 325
Hood River, Oregon 97031

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

