

Affiliated Tribes of Northwest Indians  
AirWorks, Inc.  
Alaska Housing Finance Corporation  
Alliance to Save Energy  
Allumia  
Alternative Energy Resources Organization  
Ameresco  
American Rivers  
Backbone Campaign  
Beneficial State Bank  
BlueGreen Alliance  
Bonneville Environmental Foundation  
Byrd Barr Place  
City of Ashland  
City of Seattle Office of Sustainability & Environment  
CleanTech Alliance  
Climate Smart Missoula  
Climate Solutions  
Community Action Center of Whitman County  
Community Action Partnership Assoc. of Idaho  
Community Action Partnership of Oregon  
Community Energy Project  
Earth Ministry  
Ecumenical Ministries of Oregon  
eFormative Options  
Elevate Energy  
Energy350  
EnergySavvy  
Energy Trust of Oregon  
Environment Oregon  
Environment Washington  
Forth  
Global Ocean Health  
Green Energy Institute at Lewis & Clark Law School  
Grid Forward  
Homes for Good  
Home Performance Guild of Oregon  
Human Resources Council, District XI  
Idaho Clean Energy Association  
Idaho Conservation League  
Idaho Rivers United  
League of Women Voters Idaho  
League of Women Voters Oregon  
League of Women Voters Washington  
Montana Audubon  
Montana Environmental Information Center  
Montana Renewable Energy Association  
Multnomah County Office of Sustainability  
National Center for Appropriate Technology  
National Grid  
Natural Resources Defense Council  
New Buildings Institute  
Northern Plains Resource Council  
Northwest EcoBuilding Guild  
Northwest Energy Efficiency Council  
NW Natural  
OneEnergy Renewables  
Opportunities Industrialization Center of WA  
Opportunity Council  
Oracle  
Oregon Citizens' Utility Board  
Oregon Energy Fund  
Oregon Environmental Council  
Oregon Physicians for Social Responsibility  
Oregon Solar Energy Industries Association  
Pacific Energy Innovation Association  
Pacific NW Regional Council of Carpenters  
Portland Energy Conservation, Inc.  
Portland General Electric  
Puget Sound Advocates for Retirement Action  
Puget Sound Cooperative Credit Union  
Renewable Northwest  
Save Our *wild* Salmon  
Seattle City Light  
Sierra Club  
Sierra Club, Idaho Chapter  
Sierra Club, Montana Chapter  
Sierra Club, Washington Chapter  
Small Business Utility Advocates  
Snake River Alliance  
Snohomish County PUD  
Solar Installers of Washington  
Solar Oregon  
Solar Washington  
South Central Community Action Partnership  
Southeastern Idaho Community Action Agency  
Spark Northwest  
Spokane Neighborhood Action Partners  
Sustainable Connections  
The Climate Trust  
The Energy Project  
Transition Missoula  
UCONS, LLC  
Union of Concerned Scientists  
United Steelworkers of America, District 12  
Washington Environmental Council  
Washington Physicians for Social Responsibility  
Washington State Community Action Partnership  
Washington State Department of Commerce  
Washington State University Energy Program  
YMCA Earth Service Corps  
Zero Waste Vashon



**NW Energy Coalition**  
for a clean and affordable energy future

October 17, 2019

Oregon Public Utility Commission

VIA email: [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)

RE: UM 1953

Dear Chair Decker, Commissioner Tawney and Commissioner Bloom:

The NW Energy Coalition (NVEC) has engaged at the Commission on the topic of voluntary renewable energy tariffs (VRET or green tariff) for many years. We participated in UM 1690, the docket initiated in 2014 and finalized in 2016 with an order providing the opportunity for utilities to propose VRETs under limited circumstances. Before that time, and since, an increasing number of utilities across the country are offering green tariffs to their customers. Additionally, customers, including those in Oregon, are increasingly asking for this type of product.

We viewed PGE's filing in UM 1953 with great enthusiasm as an opportunity to finally meet some customer desires' for clean energy products in Oregon. We are appreciative of parties' efforts, and the Commission staff time and attention to detail, provided to shape the green tariff option at PGE. Although we have not participated actively in the UM 1953 to date, we are an intervener in the docket and we have monitored filings and discussions.

I have reviewed PGE's recent compliance filing in this docket, staff's report and recommendations, and have talked to several other parties to the docket that are members of the NW Energy Coalition about the events that have transpired.

NVEC takes no position specifically on PGE's compliance with Order 19-075. However, we do request that the Commission take action in the public meeting on October 22 that is both consistent with proper Commission procedure and policy AND serves to advance and sustain the ability for a functioning green tariff in Oregon. Swift and definitive policy action is necessary to ensure that all parties experience certainty that a functioning green tariff program in Oregon is both desired and feasible.

In retrospect, it seems possible that the initial order was at once both too specific for this new program and not specific enough. One thing that is clear from PGE's compliance filing is that there is significant customer demand for a green tariff program, as evidenced by the following statement in staff's report (emphasis added):

“On May 31, 2019, PGE opened customer enrollment for Phase 1 of its GEAR program. As described in more detail below, *within a few minutes, PGE received customer interest in excess of the 100 MW cap* for a Company procured resource, with no customers indicating a desire to participate in the CSO option.”

Many organizations and the Commission have worked diligently to establish a functioning green tariff in Oregon for over 5 years. Green tariffs are an important element in meeting customer interests, broader demands for clean energy by communities within the utility service territory, as evidenced by the City of Milwaukee’s early participation in PGE’s green tariff, and progress at the state level to a clean energy future. We implore you to strike the right balance between process and progress in the decision before you today.

Sincerely,

*/s/ Wendy Gerlitz*

Wendy Gerlitz  
Policy Director