

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP, dba PACIFIC)	UE 245
POWER 2013 TRANSITION ADJUSTMENT)	
MECHANISM)	NOBLE AMERICAS ENERGY
)	SOLUTIONS LLC'S
)	APPLICATION FOR
)	RECONSIDERATION
)	

I. INTRODUCTION

Pursuant to ORS 756.561 and OAR 860-001-0720, Noble Americas Energy Solutions LLC (“Noble Solutions”) hereby respectfully requests that the Public Utility Commission of Oregon (“OPUC” or the “Commission”) reconsider its Order No. 12-409. Noble Solutions respectfully requests that the Commission reconsider its determination in Order No. 12-409 that PacifiCorp may discontinue the practice utilized in PacifiCorp’s last four transition adjustment mechanisms (“TAM”) of relaxing the market cap limitations used in GRID for purposes of calculating the transition adjustment. Order No. 12-409 at 16. The reasoning in Order No. 12-409 improperly conflated the treatment of market caps for purposes of calculating net power costs with the *unrelated* and separate issue of adjusting the market cap assumptions for the limited purpose of calculating the Schedule 294/295 transition adjustment. It is too late to revise PacifiCorp’s methodology for purposes of calculating the transition adjustment for the November shopping window. However, Oregon’s direct access law instructs the Commission to develop policies to eliminate barriers to the development of a competitive retail market structure. ORS 757.646. The failure to adjust the market caps in calculating the Schedule 294/295

transition adjustment results in an artificial and undue barrier to competitive retail market development.

Therefore, Noble Solutions proposes three independent changes to the Order. First, to ensure that PacifiCorp's transition adjustments are properly calculated in future years the Commission should not allow the Order's reasoning regarding use of market caps in calculating the transition adjustment to become binding precedent, and should correct the reasoning and conclusion for use in future TAM proceedings. Second, Noble Solutions respectfully requests that the Commission require PacifiCorp to provide a corrected Schedule 294/295 transition adjustment (applicable to the November 2012 shopping window) to go into effect January 1, 2013, or as soon as practicable thereafter. Third, Noble Solutions requests that the Commission require an additional shopping window in early 2013 with transition adjustment rates calculated utilizing the relaxation of the market caps to account for any customers that made their shopping decision on faulty transition calculations.

II. BACKGROUND

A. PacifiCorp's Two Separate and *Distinct* Uses of Market Caps

The issue in contention here regards use of "market caps" in GRID. In calculating net power costs, the GRID model assumes that there are restrictions on the liquidity of power markets. Noble Solutions/100, Higgins/13.

The market cap restrictions assumed by PacifiCorp raise two separate issues relevant to this docket. *First*, more extensive use of market caps in the GRID model causes an increase in *net power costs* as calculated in that model because fewer off-system sales are assumed to occur. Staff/100, Schue/13.

A *second and entirely distinct* effect of PacifiCorp's use of market caps occurs in calculating the *Schedule 294/295 transition adjustment*. The market caps will unreasonably reduce the Schedule 294 and 295 credits to direct access customers if the transition adjustment calculation does not include a corresponding adjustment to the market caps in the amount of the assumed increase in direct access load that is the central premise of the Schedule 294/295 transition adjustment calculation.¹ Noble Solutions/100, Higgins/14-15. This is so because in performing the GRID calculations PacifiCorp assumes that the generation freed up by the 25 MW of direct access (which is assumed in calculating the transition adjustment) is unable to be sold in market hubs once the market caps are reached. *Id.*

This aspect of the market cap issue has been resolved in the past TAMs by adjusting the market cap limitations in a small amount – 15 MW at Mid-Columbia and 10 MW at California-Oregon Border (“COB”) – in the calculation of the Schedule 294 and 295 transition adjustment. *Id.* at 15-16. The purpose of these adjustments is to relax the market caps by a total of 25 MW. *Id.* at 16. In this manner, the calculation can recognize that *market liquidity increases* when 25 MW of load leaves PacifiCorp's cost-of-service rates and an equivalent amount of purchases are made from the market through an ESS. *Id.* at 14, 16. Without implementing this adjustment, GRID would illogically assume that when 25 MW of load leaves PacifiCorp's cost-of-service rates to purchase from the market, there is no increase in market liquidity as compared to market liquidity assumed for purposes of calculating net power costs. *See id.*

¹ Currently, the Schedule 294 and 295 transition adjustments are credits. To the extent that the Schedule 294 and 295 transition adjustments may be charges, then the market caps unreasonably *increase* the *charges*.

B. PacifiCorp's Proposal to Change the Two Distinct Uses of Market Caps.

PacifiCorp proposed two distinct changes to the treatment of market caps with its direct filing. The *first* was to expand the use of market caps for purposes of calculating net power costs. This became an issue of contention among PacifiCorp, Staff, and the Industrial Customers of Northwest Utilities ("ICNU") because PacifiCorp's proposal affected net power costs applicable to cost-of-service customers. *See* PacifiCorp/300, Duvall/10-22; Staff/100, Schue/5-21; ICNU/100, Deen/6-12. In Order No. 12-409, the Commission first determined to retain some form of market caps in GRID for purposes of calculating net power costs because "neither Staff nor ICNU persuasively argue that GRID, as it currently exists, no longer needs market caps." Order No. 12-409 at 7. The Commission rejected PacifiCorp's revised methodology for treatment of market caps for net power cost calculations, and adopted Staff's alternative recommendation. *Id.* at 7-8.

PacifiCorp's *second* and *entirely distinct* proposal was to depart from the practice of *adjusting* market caps in a small amount when calculating the transition adjustment for direct access customers. *See* Noble Solutions/100, Higgins/16. This proposal – which was contained nowhere in PacifiCorp's direct testimony and was discovered only by reviewing PacifiCorp's work papers – became a point of contention between PacifiCorp and Noble Solutions. *See* Noble Solutions/100, Higgins/16 lns. 18-20; Tr. at 39-40.

Despite the *distinct nature* of this second issue, the Commission appeared to rely on its earlier determination in the entirely unrelated inquiry on use of market caps for calculating net power costs. The Commission's decision stated:

Although market cap limitations have been relaxed in prior years for purposes of calculating transition adjustments, such action was taken pursuant to approved

stipulations without precedential value. We must decide whether and how to apply market caps to the calculation of transition adjustments based upon the evidence presented in this proceeding. *Noble Solutions' argument that market caps in GRID unreasonably limit assumptions about how much of the generation freed up by 25 MW of direct access load will be sold is effectively the same in nature as the more general arguments made by ICNU and Staff about the limitations of market caps. We are not persuaded that there is any reason to depart from our decision to retain but revise the market caps in GRID.* We direct Pacific Power to apply the alternative market caps recommended by Staff to the calculation of transition adjustments for direct access customers.

Order No. 12-409 at 16 (emphasis added).

III. STANDARD OF LAW

ORS 756.561(1) authorizes a party to request reconsideration by the Commission of any order within sixty (60) days of service of that order. The Commission may grant reconsideration “if sufficient reason therefor is made to appear.” *Id.* OAR 860-001-0720(3)(c) provides that the Commission may grant an application for reconsideration if the applicant shows that there is “[a]n error of law or fact in the order that is essential to the decision.”

IV. ARGUMENT

A. Reconsideration Is Warranted Pursuant to OAR 860-001-0720(3)(c) Because Order No. 12-409 Relied On Erroneous Factual Conclusions.

Order No. 12-409 relied on the erroneous factual conclusion that Noble Solutions’ recommendation to continue relaxing market caps “is effectively the same in nature as the more general arguments made by ICNU and Staff about the limitation of market caps.” Order No. 12-409 at 16. The Commission also relied on the erroneous conclusion that continuing to adjust the market caps for purposes of calculating the transition adjustment would require the Commission to “depart from our decision to retain but revise the market caps in GRID.” *Id.* Because these incorrect factual conclusions were the only stated basis for the Commission’s decision, the

Commission should revise its decision.

1. Noble Solutions' recommendation was entirely unrelated to the more general arguments regarding use of market caps for purposes of calculating net power costs.

Contrary to Order No. 12-409, Noble Solutions' recommendation was *completely unrelated* to the more general arguments regarding use of market caps to calculate net power costs made by Staff and ICNU. Noble Solutions' argument relied on the fact that the process of calculating net power costs is entirely distinct from the process for calculating the transition adjustment. *See* Noble Solutions/100, Higgins/13-14. The assumptions made when calculating net power costs for Schedule 201 are *different* from the assumptions made when calculating the transition adjustment in Schedules 294 and 295. *Id.* In calculation of net power costs (Schedule 201), PacifiCorp *assumes no direct access*. Yet to calculate the transition adjustment (Schedules 294 and 295), PacifiCorp *assumes 25 megawatts of load elects direct access*. *Id.* at 5-6, 14, 16. When 25 MW of additional load is assumed to be purchasing from the market, market liquidity is irrefutably *increased*, and the logical need for market caps is *decreased*. *Id.* This warrants relaxation of market caps for the limited purpose of calculating the Schedule 295/295 transition adjustment regardless of how extensively market caps are utilized in calculating net power costs. *Id.*

The difference in assumption underlying the entire transition adjustment calculation was succinctly described by PacifiCorp itself in this proceeding. PacifiCorp stated as follows: "PacifiCorp's cost-of-service rates should be based on projected [net variable power costs] given the assumption of *no direct access* participation. . . . PacifiCorp's transition adjustment rates should be set based on the impact of direct access on PacifiCorp's costs and revenues (i.e. the

difference between projected NVPC given no direct access participation and the projected NVCA given expected direct access participation.)” *PacifiCorp’s Opening Post-Hearing Brief* at 5 (quoting Docket UE 170, Surrebuttal Testimony of Maury Galbraith, Staff/700, Galbraith/16-17). Unlike the circumstances assumed to exist for purposes of calculating net power costs, the circumstances assumed to exist for purposes of calculating PacifiCorp’s transition adjustment rate include the assumption that 25 megawatts of PacifiCorp load purchases from the market via an ESS. An increase in load purchasing from the market increases market liquidity. *See* Noble Solutions/100, Higgins/14. By definition, the circumstances assumed to exist for purposes of calculating the transition adjustment must include the assumption that the market is more liquid, and the justification for use of market caps is reduced. *Id.*

ICNU’s and Staff’s general arguments about market caps concern the applicability of such caps in actual fact, i.e., whether and to what extent market illiquidity exists, and the implications for net power costs. *See* Order No. 12-409 at 5-7. In contrast, the determination of the Schedule 294 and 295 transition adjustment is by design a *hypothetical* exercise. Noble Solutions/100, Higgins/13-14. The exercise asks and answers the question: *what if* 25 MW of direct access load were to appear? *See PacifiCorp’s Opening Post-Hearing Brief* at 5. How would net power costs change? *See id.* The change in net power costs calculated in this exercise is deemed to be equivalent to the market value of energy that would be freed up by 25 MW of direct access customers. Noble Solutions/100, Higgins/13-14. When converted to a cents-per-kWh basis, this valuation becomes basis of the Schedule 294 and 295 transition adjustment paid by real direct access customers, who are required to pay PacifiCorp effectively the difference

between the cost of generation in rates and the market value of energy. *Id.* at 5-6.²

Noble Solutions' argument addressing market caps concerns their proper treatment in this hypothetical exercise. The exercise starts with *whichever* market cap limitations are included in the determination of the baseline net power costs. *Id.*; *PacifiCorp's Opening Post-Hearing Brief* at 5. If, onto this baseline, 25 MW of direct access load is deemed to appear, it is axiomatic that 25 MW of increased market demand must also have appeared. Noble Solutions/100, Higgins/14. Where else would these hypothetical direct access customers get their power but from the market? Within the context of this hypothetical exercise, failure to recognize the increase in market demand associated with the assumed 25 MW of incremental direct access load reduces the exercise to a logical absurdity. *See id.*

Despite the obvious distinction, the entire body of evidence presented by PacifiCorp in its direct case on the subject of market caps addressed *applicability of market caps to the determination of net power costs*. In its direct case, PacifiCorp presented *not a single word of evidence* on the distinct question concerning the proper treatment of market caps in the determination of the Schedule 294/295 transition adjustment, which is performed in a separate calculation, has an entirely different premise, and does not conflict with whatever market cap assumption is used in the determination of net power costs. *See* Noble Solutions/100, Higgins/16 lns. 18-20; Tr. at 39-40. The overwhelming preponderance of evidence on this distinct topic was presented by Noble Solutions.

Therefore, PacifiCorp's claim that GRID currently overstates wholesale volumes has

² Although the transition adjustment currently results in a credit, PacifiCorp's direct access customers that would receive Schedule 294 and 295 credits would *also pay* substantial and more than offsetting *rates* to PacifiCorp for base costs through Schedule 200, which even includes generation costs. *See Noble Solutions' Post-Hearing Opening Brief* at 3. In effect, PacifiCorp's reduction in credits, is therefore an increase in rates charged to direct access customers.

relevance only to the applicability of market caps *in determining net power costs*. It has no relevance to Noble Solutions’ argument concerning the Schedule 294/295 transition adjustment because the market caps approved by the Commission are included in the baseline net power costs under Noble Solutions’ approach. Noble Solutions/100, Higgins/5-6, 14. Thus, to the extent that the Commission’s market cap decision cures any overstatement of wholesale markets in GRID, it is similarly cured under Noble Solutions’ recommended treatment.³

2. Relaxing market caps for purposes of calculating the transition adjustment would have no impact on use of market caps for purposes of calculating net power costs.

Order No. 12-409 concludes that accepting Noble Solutions’ arguments concerning the proper treatment of market caps in the calculation of the Schedule 294 and 295 transition adjustment would require the Commission “to depart from [its] decision to retain but revise the market caps in GRID.” Order No. 12-409 at 16. This is not correct.

The calculation of net power costs and the transition adjustment rates occur in two entirely distinct steps. In a TAM case, the determination of the Schedule 294/295 transition adjustment occurs *subsequent* to the resetting of net power costs. Noble Solutions/100, Higgins/5-6, 14; *PacifiCorp’s Opening Post-Hearing Brief* at 5. Once net power costs are reset, they become the baseline for the *separate* Schedule 294/295 transition adjustment calculation. Noble Solutions’ argument accepts, at its point of departure, whatever market cap assumption is made for the determination of net power costs. Therefore, Noble’s recommendation does not conflict with the Commission’s decision to retain but revise the market caps in GRID.

³ PacifiCorp provided one other faulty response to Noble Solutions’ testimony on this point by positing that the market size will not increase by the assumed 25 MW because such a level is greater than the company’s load electing direct access. PacifiCorp/300, Duvall/36. Noble Solutions thoroughly rebutted this claim and Order No. 12-409 did not adopt PacifiCorp’s reasoning. *See Noble Solutions’ Post-Hearing Opening Brief* at 13-14; Order No. 12-409 at 16.

Indeed, the relaxation of market caps in prior TAMs did *not* apply to the market caps used in determining net power costs. *See* Noble Solutions/201, Cross Exhibit/13, ¶ 15 (UE 199 TAM); *In Re PacifiCorp, dba Pacific Power: 2010 Transition Adjustment Mechanism*, OPUC Docket No. UE 207, Order No. 09-432, Appendix A at p. 5, ¶ 15 (2009);⁴ Tr. at 36-38; Noble Solutions/203, Cross Exhibit/1 (UE 216); Noble Solutions/204, Cross Exhibit/1 (UE 227).⁵ The relaxation of market caps in the four most-recent TAMs only applied to the Schedule 294 and 295 transition adjustment. Similarly, the adoption of Noble Solutions' recommendation in this case would *not* impact the use of the alternative market caps recommended by Staff in the calculation of net power costs as ordered by the Commission. Noble Solutions' recommendation only applies to the hypothetical exercise conducted to calculate the Schedule 294/295 transition adjustment and would use the alternative market caps recommended by Staff in the baseline case, from which the market caps would be relaxed by 25 MW. Noble Solutions/100, Higgins/13-14, 16-17.

B. The Commission Should Correct the Erroneous Reasoning of Order No. 12-409 and Endorse the Merits of Adjusting the Market Caps When Calculating the Transition Adjustment.

OAR 860-001-0720(2) (c) and (d) require a description of the change in the order that the Commission is requested to make and a description of how the applicant's requested change in the order will alter the outcome. Noble Solutions recommends three independent changes. First, at a minimum, the Commission should revise Order No. 12-409 to prevent any precedential

⁴ The UE 207 Stipulation is not yet included in the record. Noble Solutions requested that the Commission take official notice of Order No. 09-432, with the stipulation attached thereto, but Order No. 12-409 did not address that request. *See Noble Solutions' Opening Brief* at 8 n.5.

⁵ Relaxation of the market caps in the last two TAMs occurred without even being mentioned in the Stipulations in those proceedings because PacifiCorp voluntarily implemented the change with its initial filing and final calculations. *See Noble Solutions' Opening Brief* at 8-9.

value being attributed to its reasoning on the merits of relaxation of the market caps. Second, the Commission should require a corrected Schedule 294/295 transition adjustment (applicable to the November 2012 shopping window) to go into effect January 1, 2013, or as soon as practicable thereafter. Third, the Commission should require a special shopping window in early 2013 containing properly calculated transition adjustment rates because customers shopping in the November 2012 shopping window are being deprived of accurately calculated Schedule 294/295 transition adjustment rates.

1. At a minimum, the Commission should revise Order No. 12-409 to prevent any precedential value being attributed to its reasoning.⁶

As noted above, Order No. 12-409 relies on the logical absurdity (advanced by PacifiCorp) that a hypothetical increase in direct access load purchasing from the market, holding all other things constant, would somehow not increase market liquidity in a comparable amount. The consequence of conducting the exercise in such a logically absurd manner is to levy unreasonable rates on direct access customers. Instead of paying PacifiCorp the difference between the cost of generation in rates and the market value of energy, for periods in which market caps were in force, these customers would be forced to pay PacifiCorp the difference between the cost of generation in rates and the cost of thermal energy assumed to be backed down when 25 MW of direct access load appears. Noble Solutions/100, Higgins/14-15.

Whereas the former payment is essentially a break-even proposition for the direct access customer, the latter payment is assuredly economically untenable. *Id.* Thus, rejection of Noble Solutions' argument to retain the status quo treatment of market caps in calculation of the

⁶ Noble Solutions makes this request independent of the request that the Commission revise applicability of Order No. 12-409 to the transition adjustment rates available for customers in 2013. In the event that the Commission is not inclined to require a special shopping window, the Commission should still correct the reasoning and conclusion of Order No. 12-409 to prevent establishment of faulty precedent.

Schedule 294 and 295 transition adjustments will serve to further and unduly cripple the meager toehold direct access has made in PacifiCorp's territory.

Moreover, PacifiCorp's transition adjustment is litigated infrequently. The few TAM precedents that are created have long-standing impact. In fact, this is the first case where the Commission has addressed the merits of relaxing the market caps in GRID. *See* Tr. at 36, 39-40. The Commission should *not* let the faulty reasoning of Order No. 12-409 become binding precedent because it will unduly serve to extinguish what little direct access opportunities currently exist in PacifiCorp's service territory. Therefore, Noble Solutions respectfully requests that the Commission revise its determination in Order No. 12-409 to state that PacifiCorp should relax market caps for purposes of calculating the transition adjustment in future TAM proceedings using GRID.

2. Noble Solutions requests that the Commission require a corrected Schedule 294/295 transition adjustment (applicable to the November 2012 shopping window) to go into effect January 1, 2013, or as soon as practicable thereafter.

Noble Solutions acknowledges that it is too late to change the calculation of the 2013 transition adjustment rates for the November 2012 shopping window. However, a revision can still be applied to the Schedule 294 and 295 rates applicable January 1, 2013, or as soon as practicable thereafter. Although customers shopping in November 2012 will not have the benefit of a properly calculated transition adjustment, the rates charged to PacifiCorp's direct access customers in 2013 must be fair, just, and reasonable. Therefore, the Commission should require PacifiCorp to properly calculate the transition adjustment credits effective January 1, 2013, or as soon as practical thereafter. This would allow direct access customers to receive the appropriate value from their direct access decision.

3. **In addition, Noble Solutions independently requests that the Commission require a special shopping window in early 2013 to allow the opportunity for direct access shopping with properly calculated 2013 transition adjustment rates.**

Customers shopping in the November 2012 shopping window are being deprived of accurately calculated Schedule 294/295 transition adjustment rates. While it is reasonable for the Commission to correct these rates by the time they go into effect January 1, 2013, the negative impact of the uncorrected rates on customers' assessment of the economics of their shopping opportunities already will have occurred. However, the Commission can still provide substantive relief to PacifiCorp's current customers by providing for a second 2013 shopping window in early 2013. Portland General Electric Company formerly provided quarterly shopping windows and still offers two shopping windows per year. *See In re Pub. Util. Commn. of Ore.: Investigation into the Changes Proposed for the 3 and 5 year Cost of Service Opt-Out Program for Large Non-Residential Customers*, OPUC Docket No. UE 236, Order No. 12-057 at 3-4 (2012). Thus, there is precedent for a shopping window occurring more frequently than once per year, and a special transition adjustment calculation and shopping window early in 2013 is an administratively realistic way to help provide PacifiCorp's existing customers with the opportunity to utilize a shopping window with properly calculated transition adjustment rates. Under the circumstances presented in this case, Noble Solutions respectfully requests that the Commission allow for a special shopping window in early 2013 with the Schedule 294 and 295 transition adjustment calculated with the market caps relaxed by 25 MW.

VI. CONCLUSION

For the reasons set forth above, Noble Solutions respectfully requests that the Commission determine that so long as PacifiCorp chooses to use GRID to calculate the transition

adjustment in future years, PacifiCorp must adjust the market caps in GRID by the amount of assumed direct access load for purposes of calculating the Schedule 294/295 transition adjustment. At a minimum, the Commission should correct the precedential impact of Order No. 12-409 on this issue. Additionally, Noble Solutions respectfully requests that the Commission require PacifiCorp to provide a corrected Schedule 294/295 transition adjustment (applicable to the November 2012 shopping window) to go into effect January 1, 2013, or as soon as practicable thereafter. Finally, Noble Solutions also respectfully requests that the Commission allow for a special shopping window in early 2013 with the Schedule 294 and 295 transition adjustment calculated with the market caps relaxed.

RESPECTFULLY SUBMITTED this 20th day of November, 2012.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of November, 2012, a true and correct copy of the within and foregoing NOBLE AMERICAS ENERGY SOLUTIONS LLC'S APPLICATION FOR RECONSIDERATION, was served as shown to:

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