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	STAFF'S SUPPLEMENTAL COMMENTS

Staff of the Public Utility Commission of Oregon (staff) supplements its comments submitted on January 7, 2009, as follows.

Under staff's proposed rules for a new Division 083, Renewable Portfolio Standards, a utility or electricity service supplier may use a renewable energy certificate to comply with both the renewable portfolio standards under the Oregon Renewable Energy Act and power source disclosures under OAR 860-038-0300 only if both uses occur in the same year. A renewable energy certificate banked for future compliance with the standards may be used in power source disclosures only for the year the certificate is *actually used* for compliance.

As explained in comments filed on January 7, 2009, staff's proposed rule would enforce ORS 469A.140(3), which states that only a renewable energy certificate that "has not been used, traded, sold or otherwise transferred" may be used to comply with the renewable portfolio standards. Staff's proposed rule also would clearly inform customers how the renewable energy generated or contracted by the utility (or electricity service supplier) is in fact being used to supply them. Without retirement of the associated renewable energy certificates, the utility cannot claim the power is renewable. That would violate environmental marketing guidelines established by Green-e[1] and the National Association of Attorneys General.[2]

Further, staff's proposed rule addresses the practical problem of how to treat banked certificates in power source disclosures in the later compliance years of the Act by disclosing them when they are retired in the Western Renewable Energy Generation Information System (WREGIS) for compliance with

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[1] Green-e administers a national certification program for voluntary renewable energy options. Standard available at: http://www.green-e.org/docs/energy/Appendix%20D_Green-e%20Energy%20National%20Standard.pdf

[2] *See* National Association of Attorneys General**,** Environmental Marketing Guidelines for Electricity, December 1999, available at http://apps3.eere.energy.gov/greenpower/buying/pdfs/naag_0100.pdf. The Federal Trade Commission is reviewing its guides for environmental marketing claims to consider including renewable energy certificates. More information at: http://www.ftc.gov/bcp/edu/microsites/energy/about_guides.shtml.

renewable portfolio standards, rather than as they are being banked for potential future compliance (or potential future sales to third parties).

Staff further describes these issues below. First, however, staff addresses legal arguments against staff's proposed rule raised at or immediately prior to the AR 518 Phase II hearing.

PacifiCorp and Portland General Electric (PGE) argue as a legal matter that proposed OAR 860-083-0005(2)(d) and 860-083-0050(3) are fatally flawed because the Commission does not have authority under the Oregon Renewable Energy Act (Act) to adopt a definition for the term "use." Both companies cite to ORS 469A.140(2) as support for their proposed definition that to use a renewable energy certificate means the certificate is used to comply with a renewable portfolio standard in a calendar year under the Act.

In its initial comments, staff explained that the challenged proposed rule is within the Commission's authority to adopt. *See* Staff's Comments at 2-4. Staff's counsel advises the utilities' legal arguments are without merit.

The Commission has broad general powers to protect utility customers and the public generally from unjust practices. ORS 756.040. Ensuring that utility customers receive accurate information relating to a utility's source of power is clearly within the Commission's mandate under ORS 756.040.

Further, the Commission does not require specific authority in a statute to adopt rules relating to that statute. Pursuant to ORS 756.060, the Commission has express authority to adopt rules relating to *any* statute which it administers.

The utilities fail to point to any specific language in ORS 469A.140 that prohibits the Commission from defining the term "use." The utilities are incorrect when they argue that the statute expressly defines "use" to mean a renewable energy certificate used to comply with a renewable portfolio standard in a calendar year under the Act. The statute makes no such pronouncement. Read in context, the language the utilities rely upon merely says that one possible "use" of a certificate, that would preclude its banking, is employing it to comply with a renewable portfolio standard in a calendar year. ORS 469A.140(2); s*ee also* ORS 469A.005(1). But the statute does not say that complying with a standard in a calendar year is the *only* possible "use" of a certificate. This interpretation is supported by a fair reading of ORS 469A.140(3), which states that the utility is responsible for showing a certificate used to comply with a renewable portfolio standard has not otherwise been "used." ORS 469A.140(3)'s use of the phrase "utility…has not used…the certificate" is set forth with no limitation on its meaning.

Further, even in the event the utilities' suggested interpretation of ORS 469A.140 were correct, staff's counsel advises that ORS 757.659 provides the Commission

with ample authority to adopt a rule substantially similar to proposed OAR 860-083-0005(2)(d) and 860-083-0050(3). The Commission would be well within its authority under that statute to declare in a rule that a utility's power source disclosure for a calendar year not include power represented by a renewable energy certificate unless the certificate is actually used to comply with the renewable portfolio standard in the same calendar year.[3]

Staff first proposed its draft rule to AR 518 parties a year ago. Staff and parties discussed the proposal at workshops beginning in January 2008. PacifiCorp offered to test various approaches to power source disclosure in light of renewable portfolio standards.

In June 2008, PacifiCorp convened focus groups in two Oregon communities to get a qualitative view of residential customer perspectives and to evaluate the strengths and weaknesses of possible approaches.[4] The Company's stated goal was to develop a new energy label that reports renewable energy in the year it is generated, while also explaining that the Company is banking renewable energy certificates for future compliance with the Act.

Importantly, the Company did not test approaches that would comply with staff's proposed rule,[5] available well in advance of the study.

Much of the negative feedback on the labeling options PacifiCorp presented to study participants related to the presentation of banked certificates toward future compliance. Such discussion was necessary because the energy labels tested showed power sources for the year as if the Company were actually using the certificates that year, when in fact that would not be the case.

Study participants were suspicious of a utility's banking of certificates. However, participants became comfortable with the concept when they understood the Act allows banking to recognize renewable energy facilities the utilities acquired well in advance of enactment and to smooth the cost impacts of moving to far higher levels of renewable energy.

It is no great leap that well-crafted energy labels that conform to staff's proposed rule would make customers comfortable with the notion that utilities are not using certificates in the current generation year but are banking them for future compliance. The utilities can clearly describe the renewable energy facilities these banked certificates come from. PacifiCorp's study indicated that the types, locations and growth of new renewable resources are of primary interest to consumers.

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[3] If the Commission chose to adopt the rule under its authority granted by ORS 757.659, the rule would need to be slightly revised and re-noticed with the Secretary of State.
[4] Study by Curtis Research Associates, Portland, Oregon, June 2008.
[5] Other than a terse numerical statement of generation from renewable energy sources, without context or explanation.

Further, staff's proposed rule solves the thorny issue of what to show on energy labels in compliance years for renewable portfolio standards that begin in 2011. If, as the utilities propose, renewable energy is reported in the year it is generated — say 2009 — even though the renewable energy certificates are not used that year but are instead banked for compliance with the Act in 2011, those certificates cannot be used again. In other words, if a utility uses certificates generated in 2009 on energy labels for 2009, those certificates cannot be used in energy labels for 2011.[6] To do otherwise would be double-counting, potentially constituting a fraudulent claim.[7] Therefore, the previously disclosed, banked certificates would not be available to be used for power source disclosure in the year they are actually being used for compliance with renewable portfolio standards.

Staff expects consumers would be greatly concerned about energy labels for compliance years that do not clearly show the utility met the renewable portfolio standard for that year. The more aggressive renewable energy standards in the Act take effect beginning 2015. In or after that year, energy labels reporting only actual generation (*without* banked certificates already shown in the power source mix for the year in which they were generated) would incorrectly indicate the utilities fell short of the renewable portfolio standards.

Staff has no reason to believe the utilities plan to significantly over-comply with the aggressive renewable portfolio standards beginning 2015. Any argument that under staff's proposed rule the utilities would show significant over-compliance in future years is without merit. Instead, the utilities will continue to bank any certificates beyond the amount they need to retire to demonstrate compliance with the Act. If a utility has a significant surplus of banked certificates and certificate market prices are high, the least-cost, least-risk action to take may be selling those certificates. However, under the utilities' proposal, those banked (but not retired) certificates would previously have been disclosed in retail energy labels for consumers.

The Commission addressed a similar power source disclosure issue when it addressed how to treat renewable energy facilities where the renewable energy certificates were sold. The Commission required that PGE clearly communicate to customers that "the renewable energy attributes have been sold when the company sells Tradable Renewable Energy Credits … and that any renewable energy associated with Tradable Renewable Energy Credit sales will be based on net system mix for reporting purposes." *See* Condition No. 7 in Order No. 07-083 (Docket UP 236). To comply with this condition, PGE included an explanation along with the power supply mix chart.

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[6] ORS 469A.140(2) requires use of banked certificates before other certificates, with the oldest certificates used first.
[7] *See* footnote 2.

Another problem with the utilities' proposal to report renewable energy in the year it is generated, including certificates banked for future compliance with the Act, is tracking certificates shown in power source disclosures versus certificates tracked in WREGIS. WREGIS only allows a certificate to be retired once. Under the utilities' proposal, this would not occur until well after the claim had been made on the retail label. So a new and separate accounting system would be required to track the utilities' retail sales claims in case the certificate was in fact later sold to third parties or otherwise transferred. There should only be one tracking system, and that system is WREGIS.

Finally, staff points out that the energy labels are in large part designed to help consumers make informed choices about their power options, including basic service and renewable energy options. Currently available renewable energy options are strictly renewable energy certificate products. That is, the utility still uses the basic service generating resources to supply renewable option participants with energy, but acquires renewable energy certificates on their behalf to either match 100 percent of their monthly energy usage or a set number of kilowatt-hour "blocks" subscribed. Without retirement of renewable energy certificates on the participants' behalf, these renewable energy options would be meaningless. Staff's proposed rule for power source disclosure for basic service appropriately aligns with power source disclosure for the voluntary renewable energy options.

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

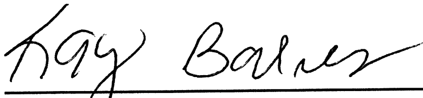
Lisa Schwartz
Senior Analyst/Lead Worker
Electric and Natural Gas Division

CERTIFICATE OF SERVICE

AR 518

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to the following parties or attorneys of parties.

Dated at Salem, Oregon, this 12th day of January, 2009.



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