

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1182

In the Matter of)	
)	
NORTHWEST INDEPENDENT POWER PRODUCERS COALITION)	OPENING COMMENTS OF THE NW ENERGY COALITION
Petition for an Investigation Regarding Competitive Bidding)	

NW Energy Coalition ("Coalition") is pleased to offer the following opening comments in response to Order No. 11-001, reopening the Oregon Public Utility Commission (OPUC) docket UM 1182, a Petition for an Investigation Regarding Competitive Bidding.

The NW Energy Coalition is a coalition of over 110 groups, including utilities, environmental, faith-based, consumer and low-income organizations, unions, government entities and businesses working for a clean and affordable energy future.

Commission Issues

This section addresses the issues currently under consideration in Phase I of this docket.

Guideline 1

Guideline 1 established the requirement that utilities issue RFPs to solicit bidders for resources with generating capacity greater than 100 MW that will be in use for at least five years, to hire an independent evaluator (IE) to evaluate bids. At issue is whether the threshold for a "major resource" should be lowered to include more projects in the competitive bidding process. While the Coalition does not feel that the threshold should be lowered at this time, we do support changes to this guideline that would fix identified loopholes allowing multiple adjacent generation facilities to be considered separately.

Guideline 11

Guideline 11 requires that the IE provide a final report after a short list of bidders has been selected by a utility that has issued an RFP. At issue is whether the role of the IE should be retained throughout negotiation and resource selection. The Coalition currently does not have a recommendation regarding this question, but looks forward to reviewing other petitioners' comments on this issue.

Conclusion

The Coalition supports a fair and open competitive bidding process that protects the interests of ratepayers. The Coalition, after reviewing the comments of other parties in this proceeding, may present a more in-depth analysis of these issues in its Closing Comments.

Wendy Gerlitz
Senior Policy Associate
NW Energy Coalition
Portland, Oregon

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **Opening Comments of NW Energy Coalition** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class Mail, postage prepaid and properly addressed, to those parties on the service list who have not waived paper service from OPUC Docket No. UM 1182.

DATED this 31st day of March, 2011.

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UM 1182 (1)
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