



Portland General Electric Company

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December 12, 2008

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

**Re: UM 1394 – QUALIFIED REPORTING ENTITY SERVICES FOR
CERTIFICATION OF RENEWABLE CERTIFICATES BY WREGIS**

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and one copy of:

**OPENING COMMENTS ON REVISED JOINT ISSUES LIST BY PORTLAND
GENERAL ELECTRIC COMPANY**

This document is being filed by electronic mail with the Filing Center. An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

This document is being served upon the UM 1394 service list.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Richard George", with a long, sweeping horizontal stroke extending to the right.

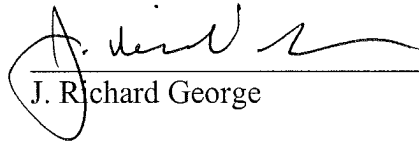
J. Richard George

JRG:smc
Enclosures
cc: Service List-UM 1394

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused PGE OPENING COMMENTS ON REVISED JOINT ISSUES LIST to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UM 1394.

Dated at Portland, Oregon, this 12th day of December, 2008.



J. Richard George

UM 1394 – SERVICE LIST

*Waived Paper Service

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1394**

In the Matter of
THE PUBLIC UTILITY COMMISSION OF
OREGON

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

**PGE Opening Comments on the
Revised Joint Issues List**

1 PGE hereby submits the following comments to the Oregon Public Utility Commission
2 Staff's ("Staff") December 1, 2008 Joint Issues List. Several of these issues were addressed
3 previously in PGE's opening comments filed on November 6, 2008; therefore, PGE incorporates
4 those comments by reference. PGE's opening comments are also attached as Exhibit A.

- 5 **1. Does the Commission have authority to require a public utility to provide QRE**
6 **service to all generators over 360 kilowatts (kW)¹ upon request if:**
- 7 **a. The generator is located in the public utility's Oregon service territory and is**
8 **interconnected to the public utility's distribution or transmission system**
9 **under a valid interconnection agreement?**
- 10 **b. The generator is located in Oregon and the public utility serves as its**
11 **Balancing Authority, but the generator is not located in the public utility's**
12 **allocated Oregon service territory?**
- 13 **c. The generator is located in the public utility's allocated service territory or**
14 **control area, or both, but is not interconnected to the public utility's**
15 **distribution or transmission system?**

16 As indicated below, PGE is willing to provide either WREGIS-defined QRE services, or
17 meter data to alternate QREs, for third party renewable generators. However PGE reiterates that

¹ Smaller generators may self-report to the Western Renewable Energy Generation Information System (WREGIS). See WREGIS Interface Control Document - Qualified Reporting Entities at 11-12, available at: <http://www.wregis.org/content/blogcategory/26/47/>.

1 there is a significant question as to whether the Commission may require the provision of such
2 services by utilities. While PGE acknowledges the Commission’s broad powers to regulate PGE
3 as a “public utility” (See ORS 756.040), PGE does not believe provision of QRE service to third
4 parties constitutes a service over which the Commission has jurisdiction.

5 ORS 757.005(1)(a)(A) provides that a “public utility” means “Any corporation . . . that
6 owns, operates, manages or controls all or part of any plant or equipment in this state for the
7 production, transmission, delivery or furnishing of heat, light, water or power, directly or
8 indirectly to or for the public” QRE services, as set forth in the WREGIS Interface Control
9 Document – Qualified Reporting Entities (see Note 1, *supra*), do not involve production,
10 transmission or delivery of power. These services involve reporting information.² The services
11 can be provided by a variety of entities in addition to balancing authorities, including load
12 serving entities, generator aggregators, meter readers and other independent third parties. *Id.*
13 QRE Services allow a renewable generator to utilize WREGIS to authenticate and certify the
14 environmental attributes of renewable energy, thereby obtaining the economic benefit of such
15 attributes.³

16 Nor are QRE services provided by a “public utility” “to or for the public.” These
17 services would be provided to a small select group of non self-reporting renewable power
18 generators that may or may not be PGE customers. RECs produced may be sold to other
19 utilities, communities, or energy providers in or out of state.

20 The Commission has previously examined its jurisdiction over services that are not
21 public utility services (not for production, transmission or delivery of power) or provided to the

² In addition to obtaining and providing data, among other services a QRE may need to provide include internal and external auditing, data validation, meter calibration and dispute resolution. See WREGIS Interface Control Document – Qualified Reporting Entities.
³ As set forth in OAR 330-150-0020(1), utilities are also required to use WREGIS to meet their obligations under the Oregon Renewable Energy Act (SB 838). Most of PGE’s renewable resources are located in Bonneville Power Administration’s (“BPA”) control area, and BPA will act as QRE for those facilities. For PGE’s renewable facilities that PGE intends to use for SB 838 compliance that are located in PGE’s control area (such as Pelton Round Butte low impact hydro), PGE will act as QRE.

1 public. In In the matter of the Suspension of Tariff P.U.C Or No p-16 of Pacific Northwest Bell
2 Telephone Company, OPUC Order No. 44607, the Commission was presented with a tariff filing
3 by a regulated telephone public utility that wished to have certain television transmission
4 services over its phone wires regulated by the Commission. The Commission examined the
5 definition of “public utility” under ORS 757.005 and explained that “it is the character of the
6 proposed service which determines whether it is or is not a public utility service in the first
7 instance. Secondly, the circumstances surrounding the rendering of such service will to a large
8 extent determine whether or not it should be regulated. Who renders the service and what
9 equipment will be used is not determinative of the issue.” (Order No. 44607 at p.7). The
10 Commission concluded that it did not have jurisdiction over the services because it found them
11 not to be dedicated to a public use. It concluded that the regulated telephone company was
12 providing the service for the convenience of a “very particular and limited type of private
13 business” and that the regulated utility was not seeking “customers, consumers of the general
14 public or those who would be seeking the usual services of a telephone company.” *Id.* at 9.
15 QRE services by PGE to unaffiliated generators have that same non-public character. Like the
16 services in Order No. 44607, they are services “offered for the convenience of private
17 businesses” (generators who want the economic value of their green tags) and not generally for
18 customers of the public utility or “those who would be seeking the usual services of an electric
19 utility.”⁴

20 The Commission’s powers are also limited to those conferred by statute, either expressly
21 or by necessary implication. Tom Lee, Inc. v. Pacific Telephone & Telegraph Co., 154 OR 272,
22 59 P2d 683 (1936). PGE is unable to find any express authority granting jurisdiction to the

⁴ The various cases on this issue concern situations where the regulated utilities were attempting to argue that their services *were* under the jurisdiction of the Commission in order to obtain benefits of regulation, including powers of condemnation, etc. See, e.g., Baines v. Marshfield & Sub. R. Co., 62 Or 510, 124 P 672 (1912); Central Or Irrig. Co v. P. Serv. Comm., 101 OR 442, 196 P. 832 (1921).

1 Commission to compel a utility to provide QRE service to third parties. ORS 757.050 does
2 provide express power to the Commission to order extension of electrical facilities and require
3 public utilities to provide service to unserved areas. However, the language of the statute clearly
4 applies to electrical distribution service.

5 Likewise, the general powers afforded to the Commission do not grant by implication
6 authority to compel a utility to make available a non-utility informational service to a very small
7 group of private businesses. As referenced above, ORS 756.040 provides the Commission with
8 broad general authority to supervise and regulate public utilities, to represent their customers,
9 and ensure that those customers and the general public receive adequate utility service at fair and
10 reasonable rates. But it cannot be implied from such mandates that the Commission should
11 require utilities to provide services that are non-utility and not for the general public.

12 It is apparent from examining other statutes that the Legislature did not intend the
13 Commission to have jurisdiction to compel non-utility non-public services. For example, the
14 statutes providing the Commission broad authority to regulate monopoly power and allocate
15 service territories does not provide for jurisdiction over QRE services. *See* ORS 758.400 to .475.
16 Specifically, ORS 758.405 explains that: “The elimination and future prevention of duplication
17 of utility facilities is a matter of statewide concern; and in order to promote the efficient and
18 economic use and development and the safety of operation of utility services while providing
19 adequate and reasonable service to all territories and customers affected thereby, it is necessary
20 to regulate in the manner provided in ORS 758.400 to 758.475 all persons and entities providing
21 utility services.”

22 Yet, QRE services do not fall under the definition of the term “utility service” used in
23 ORS 758.405. Under ORS 758.400 (3), a “utility service” is “service provided by any
24 equipment, plant or facility for the distribution of electricity to users or the distribution of natural

1 or manufactured gas to consumers through a connected and interrelated distribution system.”
2 QRE services to third party generators would be to manage information and data and not a
3 service associated with equipment, plant, facility, or power scheduling, production, and
4 distribution of electricity to end users.

5 One suggestion provided by Staff at a recent workshop is that the authority to require
6 utilities to provide QRE service derives from the recently passed Oregon Renewable Energy Act
7 (SB 838). This law, however, has no express provisions concerning QRE services or
8 empowering the Commission with general authority to implement WREGIS. The Commission
9 does have several responsibilities under the Act, including helping to implement the cost
10 limitation and recovery provisions and also determining the requirements for the implementation
11 plan for electric companies. And, the Commission may impose conditions when acknowledging
12 such an implementation plan. However, such conditions should not be misused to require
13 utilities to provide services not related to their meeting the requirements of the standard. PGE
14 does not believe that the statute allowing conditions to the acknowledgement of the
15 implementation plan was intended to be a broad delegation of authority, under which jurisdiction
16 over the provision of services to third parties could be necessarily implied.

17 Finally, with respect to the different scenarios contained in this issue, PGE believes that
18 the above-discussion would be equally applicable regardless of whether the facility is located in
19 the control area, service territory, or interconnected with PGE’s system. PGE notes, however,
20 that there may be other issues, including significant impediments and/or differences in costs with
21 respect to providing QRE services depending on such facts.

22 **2. To the extent the Commission has authority to require the public utilities to provide**
23 **QRE service, should the service be provided through a Commission-approved rate**
24 **schedule?**

25 As discussed above, PGE does not believe that the Commission has authority to require

1 the public utilities to provide QRE service. PGE anticipates providing either QRE service or
2 meter data to third party QREs in the future. If the Commission has jurisdictional authority, then
3 PGE believes a tariff is necessary. ORS 757.205.

4 **3. If QRE service is provided through a Commission-approved rate schedule, what**
5 **types of terms and conditions should be specified:**

6 **a. In the rate schedule?**

7 PGE previously filed a draft proposed rate schedule, which is attached to these
8 comments. Although certain details have not yet been determined, the schedule generally
9 provides the types of terms and conditions PGE believes should be specified.

b. In the QRE contract between the public utility and the generator?

10 PGE is required to submit a proposed agreement by Jan 7, 2009, which will contain the
11 terms and conditions it believes are appropriate. In general such terms will include, but not be
12 limited to, process for gathering and submitting data to WREGIS, provisions for cost recovery,
13 limiting liability, and provide for dispute resolution.

14 **4. Regardless of whether the Commission possesses the authority to require the public**
15 **utilities to provide QRE service, are the public utilities willing to voluntarily provide**
16 **such service? If so, to whom and under what conditions? If utilities voluntarily**
17 **provide QRE service and associated costs are allowed in rates, what types of terms**
18 **and conditions should be specified in the QRE contract between the public utility**
19 **and the generator?**

20 Yes, PGE is willing to voluntarily provide QRE service to generators in the service
21 territory. For a general description of such service, please see attached draft tariffs. Please refer
22 to PGE's response to Question 3.b. for the terms and conditions that should be specified between
23 the public utility and the generator.

1 **5. Would the following public utility activities be prohibited as discriminatory under**
2 **relevant law or otherwise be prohibited by any other law:**

- 3 a. **Acting as a QRE for owned or contracted facilities from which the utility is**
4 **receiving renewable energy certificates (RECs), but not offering QRE service**
5 **for other generators interconnected to the utility or for which the utility is**
6 **the Balancing Authority (“Third Party Generators”).**
- 7 b. **Charging Third Party Generators for QRE service if the cost of providing**
8 **such service for owned or contracted facilities from which the utility is**
9 **receiving RECs is included in retail rates.**
- 10 c. **Charging Third Party Generators a different rate for QRE service than the**
11 **internal cost the utility incurs for owned or contracted facilities from which**
12 **the utility is receiving RECs.**
- 13 d. **Charging Third Party Generators an amount for QRE service in excess of an**
14 **amount charged to contracted facilities from which the utility is receiving**
15 **RECs.**

16 PGE does not believe any of the activities listed in ‘a’, ‘b’ and ‘c’ above would be
17 discriminatory or prohibited under any “relevant law”.⁵ PGE would incur costs for registering as
18 a QRE and providing QRE services for owned and contracted facilities. Those costs would be
19 treated like any other operations and maintenance costs of PGE carrying out its business in
20 compliance with applicable laws and regulations (here, the renewable energy standard). With
21 respect to sub-issue “d”, assuming PGE does provide this service to generators pursuant to an
22 OPUC-approved tariff, rates charged would be designed to recover some or all costs incurred in
23 providing the service.

24 **6. What are the requirements to be a QRE under the Western Renewable Energy**
25 **Generation Information System?**

26 The requirements are set out at length in the WREGIS Interface Control Document -
27 Qualified Reporting Entities, Note 1, *supra*.

28 **7. Can third parties compete effectively with public utilities to provide QRE service for**
29 **generators over 360 kW?**

⁵ Other than ORS 757.310-.355, PGE is unsure of what might constitute “relevant law” for purposes of this issue.

1 PGE has no knowledge or information concerning whether third parties can compete
2 effectively with public utilities. Third parties may certainly provide such services. WREGIS's
3 Interface Control Document for Qualified Reporting Entities allows QRE service providers to
4 include, but not be limited to, Balancing Authorities, Load Serving Entities, Generator
5 Aggregators, Meter Readers, and Independent Third Parties. There are no legal or WREGIS
6 barriers preventing parties from installing or reading existing metering and providing QRE
7 services to generators. PGE is aware of other entities, such as “Fat Spaniel” and “Viasyn, Inc.”
8 which are not balancing authorities and provide such QRE services.

9 **8. What are the estimated costs for providing QRE service to Third Party Generators**
10 **and what is the basis for these costs?**

11 *See* attached draft tariffs and supporting documentation previously submitted in our
12 initial comments.

13 **9. Assuming costs associated with QRE service are allowed in retail rates, should the**
14 **public utilities charge generators the fully allocated cost or the incremental cost for**
15 **QRE services?**

16 If utilities provide QRE service, charges that recover the full cost for QRE service from
17 the generators will minimize the potential that utility customers subsidize the service.
18 Nevertheless, the Commission could determine that customers should pay some or all of the
19 costs. PGE is concerned that subsidized rates would be anti-competitive and potentially violate
20 the Commission’s mandate to eliminate barriers to the development of competitive market
21 structures. *See* ORS 757.646. Oregon utilities are required to provide service to customers at
22 rates that are fair, just and reasonable. *See* ORS 757.020.

23 **10. Would charges for either fully allocated or incremental costs of QRE service be**
24 **prohibitively expensive for generators?**

25 PGE is unable to provide information as to whether generators would find fully allocated
26 or incremental costs of QRE service prohibitively expensive.

1 As stated previously, the utility should charge the full cost for providing QRE service. If
2 the charges for this service from a public utility are considered prohibitively expensive for a
3 generator, other options could be considered as long as utility customers are not subsidizing the
4 costs. Utilities could provide basic meter data or access to meters at less cost than providing full
5 QRE services.

11. Does the Commission have the authority to order that QRE services provided to Third Party Generators be subsidized by ratepayers on a pilot program basis? If so, what are the bases and standards for such authority? Should QRE services to Third Party Generators be subsidized?

6 Please refer to PGE’s response to Question 9. Under a cost-causation approach, the costs
7 are recovered from users of the service. Certainly, the Commission may approve tariffs that
8 explore new services related to provisions of a utility. If Commission authority supports QRE
9 service as a regulated service, the Commission may approve pilot projects.

12. Should public utilities provide a service comprised of reporting generation data that the utility has to a third party upon the generator’s request, thus giving the generator the additional option of choosing an alternative QRE? If so, what are the costs of providing such a service, and what are:

a. The bases for those costs?

15 PGE has proposed providing meter data that the utility has on a per meter read basis. *See*
16 attached draft tariff.

b. The liabilities of providing meter data to an alternative QRE?

18 The liabilities relate to the data provided such as: inaccuracy, omissions, delays, and any
19 resulting damage claims.

c. The responsibilities of providing meter data to an alternative QRE? What if the generator wants corrections/adjustments?

22 PGE will have responsibilities and liabilities pursuant to the Tariff. Presumably, errors or
23 corrections could be worked out informally; however, standard complaint processes would be

1 applicable if disputes arise.

2 **13. Under what conditions might additional metering be needed to provide QRE service**
3 **for generators, and who should bear the cost?**

4 As a prerequisite to providing service, PGE believes that generators must be
5 interconnected to PGE's system, have executed a valid interconnection agreement (if required)
6 and have installed necessary metering. Costs for interconnection and metering would be covered
7 through the applicable interconnection procedures and agreement. Meter data from the
8 generation must be available. In the case of net metering, additional metering would be
9 necessary to read only the output from generation and not the use.

10 **14. Does the Federal Energy Regulatory Commission have jurisdiction over Qualified**
11 **Reporting Entity (QRE) service provided by public utilities? Does the answer**
12 **depend on the design of this service and which function of the utility provides the**
13 **service?**

14 No. PGE does not believe that FERC has jurisdiction over QRE services, which do not
15 constitute transmission or wholesale sales of electricity in interstate commerce. The answer
16 depends on the character of the service, and not which function of the utility provides the service.
17 Theoretically, even if the service could be provided in an interstate manner and potentially
18 subject to federal jurisdiction as affecting interstate commerce, PGE is unsure as to whether
19 FERC would exercise such jurisdiction.

20 **15. What are the responsibilities and liabilities of the utility providing QRE services?**

21 The responsibilities of a QRE are set forth in the WREGIS Interface Control Document –
22 Qualified Reporting Entities. See Note 1, *supra*.

- 1 Liabilities could include legal action against PGE for losses or damage resulting from delays,
- 2 errors, omissions, or other inaccuracies in reporting to WREGIS.

Respectfully submitted,

/s/ J. RICHARD GEORGE

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November 6, 2008

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street, N.E., Suite 215
Salem, OR 97301-2551

RE: PGE's Comments and Draft Tariff in UM 1394 – Western Renewable Energy Generation Information System, Qualified Reporting Entity (QRE)

PGE hereby submits its initial comments and draft tariff provisions in this docket. Attachment 1 includes opening comments on Staff's initial issues list in the October 7, 2008 Staff recommendation to open the UM 1394 docket to investigate QRE services by electric companies. We anticipate that, as provided by the schedule in this docket, the issues will be supplemented with additional questions to help clarify the nature of the requirements to be considered.

A description of the draft tariff provisions for QRE services and an alternative service, is enclosed as Attachment 2. The information presented in Attachment 2, including draft tariff schedules, represents PGE's preliminary efforts to assess the nature, scope, and range of costs for providing the service. The information presented here does not imply that PGE will offer the service described or whether the Commission will approve the proposed service.

Thank you for the opportunity to provide comments in this docket.

Please direct any questions regarding this filing to me at (503) 464-7891. Please direct all formal correspondence and requests to the following email address:
pge.opuc.filings@pge.com

Sincerely,

Doug Kuns
Manager, Pricing & Tariffs

Enclosures
cc: UM 1394 Service List

UM 1394, Staff Issues List
Initial Comments of PGE

In accordance with the October 22, 2008 Prehearing Conference Report & Ruling, PGE hereby submits the following comments on Staff's initial issues list offered in the Staff memo. As the issues list will be further developed through a workshop and further submittals, and there will be an additional opportunity for opening comments on the issues, these comments should be considered preliminary.

In offering these preliminary comments, PGE is not taking a position on the merits of Western Renewable Energy Generation Information System (WREGIS), or of providing Qualified reporting entity (QRE) services to its owned or contracted generation and/or third parties.

1. Does the Federal Energy Regulatory Commission (FERC) have jurisdiction over QRE service provided by electric companies? Does the answer depend on the design of this service and which function of the utility provides the service?

No. PGE does not believe that FERC has jurisdiction over QRE services. Theoretically, the service could be provided in an interstate manner and potentially subject to federal jurisdiction as affecting interstate commerce, but PGE is unsure as to whether FERC would exercise such jurisdiction. PGE does not believe this issue needs to be addressed further in this docket.

2. Would it be discriminatory for a utility to charge for QRE service for unaffiliated entities, but not charge itself for service for owned or contracted facilities?

No. PGE would incur costs for registering as a QRE and providing QRE services for owned and contracted facilities. Assuming PGE does provide this service to generators pursuant to an OPUC-approved tariff, rates charged would be designed to

recover costs incurred in providing the service. PGE does not believe this issue needs to be further addressed in this docket.

3. Is QRE service, except for very small generators, a competitive service?

Yes. WREGIS's Interface Control Document for Qualified Reporting Entities allows QRE service providers to include, but not be limited to, Balancing Authorities, Load Serving Entities, Generator Aggregators, Meter Readers, and Independent Third Parties. There are no legal or WREGIS barriers preventing parties from installing, or reading existing metering and providing QRE services to generators. PGE is aware of other entities, such as "Fat Spaniel" and Viasyn, Inc. which are not balancing authorities and provide such QRE services. To the extent there are perceived market disincentives preventing potential QRE service providers from providing QRE services in PGE's service area or control area, PGE does not believe the Commission has jurisdiction over that market.

4. Should electric companies be required to provide QRE services to all generators upon request?

PGE believes there is a significant question as to whether the Commission has jurisdiction over the provision of WREGIS-defined QRE services by utilities. *See, e.g., In the matter of the Suspension of Tariff P.U.C Or No p-16 of Pacific Northwest Bell Telephone Company, OPUC Order No. 44607.* QRE services by PGE to unaffiliated generators would be services offered for the convenience of private business and not for customers of the general public or those who would be seeking the usual services of an electric utility.

5. What are the estimated costs for providing QRE services to unaffiliated entities and what is the basis for these costs?

See attached tariffs and supporting documentation.

6. Should the utilities charge the full cost for QRE service or would the cost be prohibitively expensive for generators?

If utilities provide QRE service, they should charge the full cost for QRE service, so that utility customers are not unfairly subsidizing other businesses. Oregon utilities are required to provide service to customers at rates that are fair, just and reasonable. See ORS 757.020. Moreover, subsidized rates would be anti-competitive and potentially violate the Commission's mandate to eliminate barriers to the development of competitive market structures. See ORS 757.646.

7. Should the service be subsidized region-wide on a pilot program basis?

As discussed above, the service should not be subsidized by utility customers. The costs should be directly borne by users of the service.

UM 1394
PGE's Draft QRE Services Discussion

As required by UM 1394, PGE has prepared draft tariffs and preliminary comments on establishing PGE as a Qualified Reporting Entity¹ (QRE) for independent generators in the PGE service area. Appendices 1 and 2 are working draft tariff schedules that illustrate two structures for utility-provided Western Renewable Energy Generation Information System (WREGIS) QRE reporting and/or meter data services. Each approach allows eligible renewable generators to arrange to have appropriate information entered into WREGIS that may result in the generator receiving Renewable Energy Certificates (REC's).

PGE may present additional information and issues related to the nature, scope, content and applicability of a draft tariff during this UM 1394 investigation. In addition to the issues raised by Staff in its October 7, 2008 Staff Report, PGE notes potential issues concerning consistency with WREGIS QRE requirements regarding functional separation and implied risks and liabilities of providing QRE services for non-PGE entities that may need to be addressed.

Background and Limitations

The information presented here and as outlined in Appendices 1 and 2 is provided for discussion purposes only. PGE does not commit to provide the services described. The terms, conditions and prices outlined and discussed herein represent limited initial analysis of the subject matter. PGE has not determined if the tariff provisions and underlying services meet all requirements of WREGIS as well as regulatory requirements of the State of Oregon and FERC. There may be other legal or regulatory requirements the tariff provisions must meet.

Discussion of Draft Schedules

Appendix 1, Sch. XXX, WREGIS Renewable Energy Certificates Reporting Service

This schedule sets out terms and conditions for providing a metered-data gathering and reporting service to WREGIS Account Holders in the PGE jurisdictional service territory where PGE is a QRE. This service requires that PGE be registered with WREGIS as a QRE and that independent generators have selected PGE through WREGIS as their QRE. The resource generator must be connected to PGE's distribution system with a valid interconnection agreement. An initial set of conditions and requirements are listed in the draft tariff (although not assumed to be comprehensive).

¹ The QRE service is established and defined by Western Renewable Energy Generation Information System (WREGIS).

This service is optional for the generator.

Significant issues remain unanswered in this draft. Issues include the costs of acquiring metered data, internal data acquisition integrity, data retention requirements, liability and audit functions (which are not currently identified in the charges). WREGIS requirements for a QRE directly affect the services and costs and require further evaluation.

Pricing

Sch. XXX, WREGIS QRE Services is based on an initial assessment of the incremental costs of implementing and maintaining a QRE service for both PGE and independent generators. PGE has not defined where in the organization the function would be housed, therefore, certain aspects of the service and costs are unknown. For purposes of this draft, the unit pricing reflects the nameplate capacity rating of each renewable generator being reported through the QRE service.

Pricing is based on three primary incremental activities and assumptions about on-going activities. The major activities are (1) internal set-up of data gathering capabilities, data transfer, data storage system, training, QRE registration and related processes and procedures in various functional areas of the Company, (2) set-up of each renewable generator's reporting process with PGE and WREGIS, and (3) the on-going data reporting activity which includes gathering, storing, formatting, reviewing, reconciling readings and reporting reading to WREGIS and the WREGIS account holder.

The tariff consists of:

- QRE set-up cost recovery charge: PGE assumes that no new hardware information systems are required to be established in order to gather and record basic meter data. All necessary metering is assumed to be addressed in the appropriate interconnection agreement. At a minimum, the estimated incremental costs are approximately \$10,000 - \$15,000, consisting of staff time to have the simplest form of data collection and reporting programs designed.

We assume for this draft that PGE will utilize the PGE QRE service to report certain RECs from PGE low impact hydro. Therefore the initial set-up costs were prorated on a generator nameplate or RPS-eligible MW basis yielding approximately 83% of set-up costs allocated to PGE and the remaining costs to other generators. The pricing assumes 60 MW total nameplate capacity ratings being reported of which 50 MW is PGE generation. This yields a QRE One Time Fee of approximately \$250. Alternative allocations include use of a per generator fee. A volumetric pricing is not preferred given the incremental activity is not kWh dependent.

In addition, costs associated with time required to interact with each generator to establish the service, review the agreement and set-up accounts are required and need to be recovered in the initial activation fee. The placeholder cost for this activity is \$150.

- On-going data reporting fee: PGE assumes that approximately 0.5 FTE is required in various activities to maintain this service. For simplicity, we assume this translates to annualized estimated cost of \$50,000. Using the same assumption of 60 MW being reported, the monthly charge is approximately \$85.00.

Appendix 2, Sch. 300, Renewable Generation Metered Output Data

This optional service charge approach is a new miscellaneous service charge line item in PGE's Schedule 300 for collecting and transferring REC data information. The service provides a renewable generator or the generator's authorized agent, such as a QRE other than PGE, with the ability to request and receive on a per meter read basis, the metered generation output data. The service is an alternative to the draft tariff described and is an optional service.

The generator and meter must be located in the PGE service area. The meter must be a PGE-owned meter and read remotely. The meter data will be supplied as a single kWh amount. PGE is not the QRE for the renewable generator under this Sch. 300 service.

The draft Sch. 300 service is shown in a redline format to highlight the tariff change.

Pricing

The Sch. 300 fee is established at \$45 per meter reading. The service, although not fully defined at this time, will transfer a meter reading for the renewable generator to the agent (potentially an independent QRE). The service costs include an estimate of the time needed to set-up a simple transfer schedule and the process of transferring data. No hardware system changes are assumed in the cost.

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**SCHEDULE XXX
WESTERN RENEWABLE ENERGY GENERATION INFORMATION SYSTEM
RENEWABLE ENERGY CERTIFICATE REPORTING SERVICE**

PURPOSE

This schedule establishes the optional Qualified Reporting Entity (QRE) service to renewable resource generators. The renewable resource generator must be located in the Company's service territory and be a Western Renewable Energy Generation Information System (WREGIS) Account Holder.

AVAILABLE

In all territory served by the Company.

APPLICABLE

This schedule is applicable to resource generation facilities (1) with a nameplate capacity greater than 360 kW at a site connected to the Company's distribution, (2) located with the Company's retail service territory and (3) are WREGIS Account Holders.

CHARGES

QRE One Time Set Up Fee:	\$400.00
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MONTHLY

QRE Reporting Fee:	\$85.00
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DATA REQUIREMENTS

WREGIS Account Holders are responsible for data created and submitted to the Company. The Company will gather the data from meters.

REPORTING

The Company will report to WREGIS monthly for WREGIS Account Holders in accordance with the Interface Control Document (ICD).

Once data has been submitted to WREGIS, the WREGIS Account Holder can track the data directly with WREGIS and not through the Company.

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SCHEDULE XXX (Concluded)

DATA CORRECTIONS / ADJUSTMENTS

Once meter data has been submitted to WREGIS, adjustments can be made by the Company before Certificate creation by WREGIS upon request of the generator. Requested adjustments are solely the responsibility of the generator and must be sent by email to _____@pgn.com. The Company will make such adjustments within 30 days.

Once the Certificate has been created, the Company will make adjustments up to the time specified in the WREGIS Operating Rules.

SPECIAL CONDITIONS

1. The resource generator must be a registered WREGIS Account Holder. The resource generator is responsible for becoming an Account Holder.
2. The Account Holder must have registered applicable generating units with WREGIS as outlined in the WREGIS Operating Rules.
3. The WREGIS Account Holder must pay any applicable fees due to WREGIS.
4. The WREGIS Account Holder must abide by the rules set forth in the WREGIS Operating Rules.
5. The WREGIS Account Holder must be interconnected with the Company and have a valid interconnection agreement if required and necessary metering installed prior to requesting this service.
6. Service Requirements:
 - a. Metering: Appropriate metering must be installed and may require customer payments.
 - b. Meters must be owned and operated by the Company.
 - c. The meter must meet metering standards for Renewable Generating Units as outlined in the WREGIS Operating Rules. In instances of aggregation the generating units must meet Aggregation General Characteristics criteria as outlined in the WREGIS Operating Rules. The WREGIS Account Holder is solely responsible for meeting all standards for generating units.
7. The WREGIS Account Holder must enter into a WREGIS Reporting Service agreement with the Company.
8. The Company provides only the WREGIS REC reporting described herein and the service agreement. The Company does not in any way take title to, own, purchase or otherwise manage in any way the production or subsequent disposition of any reported renewable generation.

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**SCHEDULE 300
CHARGES AS DEFINED BY THE RULES AND REGULATIONS
AND MISCELLANEOUS CHARGES**

PURPOSE

The purpose of this schedule is to list the charges referred to in the General Rules and Regulations.

AVAILABLE

In all territory served by the Company.

APPLICABLE

For all Customers utilizing the services of the Company as defined and described in the General Rules and Regulations.

INTEREST ACCRUED ON DEPOSITS (See Rules D and H)

4% per annum.

BILLING RATES (Rules C, E, F, H, I and J)

Trouble call, cause in Customer-owned equipment

Scheduled Crew Hours ⁽¹⁾	No charge
Other than Scheduled Crew Hours ⁽¹⁾	\$170.00
Returned Payment Charge	\$ 25.00
Special Meter Reading Charge	\$ 35.00
Meter Test Charge	\$ 75.00
Late Payment Charge	1.7% of delinquent balance
Field Visit Charge ⁽²⁾	\$ 20.00
Bill History Information Service Charge (Not applicable when a billing dispute is filed with the Commission - see Rule F)	\$ 32.00
Portfolio Enrollment Charge	\$ 5.00
Customer Interval Data (12 months) to Customers	\$100.00
Customer Interval Data (12 months, formatted and analyzed)	Mutually agreed price
<u>Meter Reading and Reporting to Third Party</u> <u>WREGIS Qualified Reporting Entity ⁽³⁾</u>	<u>\$ 45.00 per reading</u>
Switching Fee	\$20.00
Unauthorized Connection of Service / Tamper Fee	\$75.00

(1) Scheduled Crew Hours - The Company's Scheduled Crew Hours for the above listed services are from 6:30 a.m. to 10:30 p.m., Monday through Friday, except for Company-recognized holidays. The Customer will be informed of and agree to the charges before Company personnel are dispatched.

(2) See Rule H, Section 2 for applicable conditions.

(3) Includes meter read and data transfer to a third party. The generator and meter must be located in the PGE service area. The meter must be PGE-owned meter and read remotely. Meter installation cost is not included.

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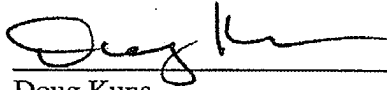
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UM 1394.

Dated this 6th day of November, 2008.



Doug Kuns
Manager, Pricing & Tariffs
On behalf of Portland General Electric Company

SERVICE LIST

OPUC DOCKET NO. UM 1394

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