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April 24, 2014

VIA ELECTRONIC FILING
& FIRST CLASS MAIL

Oregon Public Utility Commission
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem, OR 97308

Re: Public Utility Commission Investigation into Qualifying Facility Contracting and Pricing
Docket No. UM-1610

Dear Filing Center:

Enclosed please find an original one (1) copy of Obsidian Renewables LLC's Motion for Clarification in Docket No. UM 1610.

Should you have any questions regarding this clarification, please call.

Very truly yours,

Tommy A. Brooks
FOR

Chad M. Stokes

CMS:sk

cc: UM-1610 Service List

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1610

In the Matter of	)	
	)	
PUBLIC UTILITY COMMISSION OF OREGON,	)	OBSIDIAN RENEWABLES LLC'S MOTION FOR CLARIFICATION
	)	
Investigation into Qualifying Facility Contracting and Pricing.	)	

Pursuant to OAR 860-001-0420, Obsidian Renewables LLC ("Obsidian") requests limited clarification of the Oregon Public Utility Commission's ("Commission") Order No. 14-058 entered on February 24, 2014 in this docket. As explained more fully below, Obsidian asks the Commission to clarify how the Capacity Adder described in Staff/103/Bless/2 will be applied to Renewable Solar QF Resources.

INTRODUCTION AND BACKGROUND

The Commission opened this docket on June 29, 2012 to address contracting under the Public Utility Regulatory Policy Act ("PURPA"), and related avoided cost issues. The Commission issued an order for Phase I of this proceeding on February 24, 2014 (Order No. 14-058). One of the decisions reached in Order No. 14-058 was to "modify the current methodology for calculating standard avoided cost prices and standard renewable avoided cost prices to account for the capacity contribution of different QF resources and wind integration costs." Order No. 14-058, at 2. The Order further directs the utilities to calculate and provide a capacity payment consistent with the testimony provided by Staff, specifically Staff/103/Bless/2 and Bless/3.

Obsidian supports the Commission's modification of the renewable avoided cost price calculation to reflect a QF's capacity contribution to a utility's portfolio. The capacity benefits of QF resources are too large to go unaddressed. While the overall intent of the Order on this issue is clear, Obsidian is seeking clarification of how the Capacity Adder devised by Staff will be applied to Renewable Solar QF Resources. Specifically, Obsidian is concerned that the application of the Capacity Adder only as an adjustment to the price for energy actually delivered, as shown in Staff 103/Bless/2, would result in an inadvertent double-discounting of the capacity payment for Renewable Solar QF Resources. As explained more fully below, the concern over the double-discounting specifically applies to Renewable Solar QF Resources.

A. The Capacity Contribution for Renewable Solar QF Resources is Double Discounted

The Commission adopted the methodology for calculating the capacity contribution for Renewable Solar QF Resources as set forth in Staff's testimony and Staff 103/Bless/2, which is attached hereto as Exhibit A. Staff's testimony explains how a Renewable Solar QF Resource is not entitled to the utility's full capacity value of $24.48 for all peak hours because it is only contributing to a utility's peak demands part of the time. The table in Staff/103/Bless/2 assumes for illustration that the solar capacity contribution to peak is 30 percent, whereas the avoided proxy wind plant's capacity contribution to peak is 5 percent. This results in an incremental capacity contribution to peak of 25 percent. Accordingly, the table in Staff/103/Bless/2 demonstrates that the Renewable Solar QF Resource is entitled to 25 percent of a utility's capital cost allocated to capacity (shown as 25% of $24.48 in the example), resulting in a discounted Capacity Adder of $6.12. In other words, the discounted Capacity Adder adjusts for the fact that the Renewable Solar QF Resource is an intermittent resource and is not available during all peak hours. Obsidian understands and agrees that Staff's approach of discounting the Capacity Adder is appropriate for an intermittent resource.

What must be clarified, however, is the number of peak hours for which the discounted Capacity Adder must be paid. The problem lies in the fact that Staff/103/Bless/2 appears to show that the reduced Capacity Adder of $6.12 would only be paid for those peak hours during which the Renewable Solar QF Resource is actually generating and delivering energy to the host utility. Because the Capacity Adder has already been significantly reduced (from $24.48 to $6.12) to reflect the fact that the solar capacity is not available in all peak hours, paying this reduced Capacity Adder only in those hours in which the Renewable Solar QF Resource is actually delivering power results in a *second* discount of the total capacity payment.

There is nothing in Staff's testimony that indicates that Staff intended to apply a second discount applicable only to the capacity payment to Renewable Solar QF Resources. Staff/100/ Bless/23. Obsidian submits that this second discounting of the total capacity payment to Renewable Solar QF Resources is unintended and is likely an anomaly in how the data is presented in Staff/103/Bless/2. A Renewable Solar QF Resource therefor should be entitled to the reduced Capacity Adder for all peak hours.

B. The Double Discount Issue Only Applies to Renewable Solar QFs

Obsidian's concerns are best illustrated by comparing the tables for Renewable Avoided Cost Prices: Baseload QF Resources (Staff/103/Bless/3) and Renewable Avoided Cost Prices: Solar QF Resources (Staff/103/Bless/2). As Mr. Bless explains in his testimony, it is assumed that the Renewable Baseload Resource Contribution to Peak is 100%. The Incremental Capacity Contribution to Peak--the difference between the Renewable Baseload Resource and the Renewable Proxy Resource--is 95%. By comparison, the Renewable Solar Resource Contribution to Peak is assumed to be 30% and the Incremental Capacity Contribution to Peak is 25%. Thus, given the proportionality between what each resource type contributes to peak on an incremental basis, one would assume that the total capacity payment made to the Renewable Solar QF Resource would be approximately 26.3% (25%/95%) of the total capacity payment made to the Renewable Baseload QF Resource. This assumption holds true of the Capacity Adder (lines G of Bless/2 and Bless/3), where the value assigned to the Renewable Solar QF Resource ($6.12) is approximately 26.3% of the value assigned to the Renewable Baseload QF Resource ($23.26).

What Obsidian is asking clarification of is the total capacity payment that would be made to each resource type. Again, given their proportionality to each other in terms of incremental contribution to peak, one would expect that the total capacity payment to the Renewable Solar QF Resource would be approximately 26.3% of the total capacity payment made to the Renewable Baseload QF Resource. If the two tables are compared, however, the total capacity payment to the Renewable Solar QF Resource would only be about 10% of the total capacity payment to the Baseload Resource.

As stated above, this anomaly arises because Staff/103/Bless/2 shows the Capacity Adder as a function of the on-peak energy delivery price. Because the Renewable Baseload QF Resource is by definition available in all hours (barring maintenance outage time, of course) this means that the Renewable Baseload QF Resource would receive the larger Capacity Adder ($23.26) for all peak hours (4,992) for a total capacity payment of $116,113.92. As an intermittent resource, however, the Renewable Solar QF Resource is by definition not available in all on-peak hours. Based on its own operating data, Obsidian estimates that its solar project would be available for approximately 1,971 out of the 4,992 on-peak hours. The fact that solar is an intermittent resource and available less often than the Renewable Baseload QF Resource is already accounted for in the discounted Capacity Adder (Bless/2/Column G). By applying the already discounted Capacity Adder only to actual power output, the Renewable Solar QF Resource would therefore receive a much smaller Capacity Adder of ($6.12) for a much smaller number of on-peak hours (1,971) resulting is a total capacity payment of $12,062.52. Thus, the result is that the total capacity payment that would be paid to the Renewable Solar QF Resource ($12,062.52) would be disproportionately small as compared to the total capacity payment made to the Renewable Baseload QF Resource ($116,113.92).

To be clear, Obsidian is not challenging Staff's methodology for calculating the Capacity Adder for different resource types as adopted by the Commission in Order 14-058. Obsidian is not challenging Staff's recommendation that the Capacity Adder only be paid during peak hours. Nor is Obsidian suggesting that an intermittent Renewable Solar QF Resource should be entitled to the same Capacity Adder or total capacity payment as a Renewable Baseload QF Resource. What Obsidian is saying is that the difference in performance between the Renewable Solar QF Resource and the Renewable Baseload QF Resource is already captured in the discounted Capacity Adder that is applied to solar ($6.12) as compared to baseload ($23.26). There is therefore no need to apply a *second* discount to the Renewable Solar QF Resource by applying the smaller

Capacity Adder to fewer on-peak hours. Doing so would result in a total capacity payment to the Renewable Solar QF Resource that is not only disproportionately small but that also undercompensates the Renewable Solar QF Resource for its capacity contribution.

Obsidian seeks clarification that the discounted Capacity Adder calculated pursuant to the methodology described in Staff/103/Bless/2 will be paid to an eligible Renewable Solar QF Resource for all on-peak hours, and will not be limited only to those peak hours in which the resource actually delivers output to the purchasing utility. This means, for example, that the hypothetical Renewable Solar QF Resource would receive a total capacity payment equal to $6.12 per MW of capacity for each of the 4,992 on-peak hours in a year (again, barring adjustment for outage or mechanical unavailability). Doing so would bring the total capacity payment for the Solar Resource up to $30,551.04 per MW. This payment amount would be approximately 26% of the total capacity payment made to the Renewable Baseload QF Resource--which makes the two payment streams proportional to each resource type's respective incremental contribution to capacity. Obsidian submits that this proposed clarification is consistent with the methodology devised by Staff and adopted by the Commission for valuing capacity contributions.

CONCLUSION

Obsidian is concerned that a Renewable Solar QF Resource may only receive a reduced Capacity Adder for a reduced number of peak hours. By applying the reduced Capacity Adder as a function of the energy production price, the table in Staff 103/Bless/2 results in a double-discount of the capacity contribution payment. This anomaly does not occur with Renewable Baseload QF Resources, which would receive the Capacity Adder in all peak hours. Nor does this anomaly occur with Renewable Wind QF Projects, because there is no incremental contribution to capacity beyond the proxy wind plant. Accordingly, Obsidian respectfully request the Commission clarify that the Capacity Adder applied to Renewable Solar QF Resources should not be double discounted. Specifically, the discounted Capacity Adder described in the Staff testimony and shown on Staff/103/Bless/2 shall be paid during all peak hours.

DATED this 24th day of April 2014.

Respectfully submitted,

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CASE: UM 1610
WITNESS: ADAM BLESS

PUBLIC UTILITY COMMISSION
OF
OREGON

STAFF EXHIBIT 103

Exhibits in Support
Of Response Testimony

March 18, 2013

Exhibit 103
Renewable Avoided Cost Prices: Wind QF Resource

	A	B	C	D	E	F	G	H	I
	Renewable Avoided Resource		Capacity		Wind QF Resource				
Year	Avoided Cost On-Peak $/MWh	Avoided Cost Off-Peak $/MWh	Capital Cost Allocated to Capacity (On-Peak Hours) $/MWh	Renewable Proxy Resource Contribution to Peak %	QF Resource Contribution to Peak %	QF Incremental Capacity Contribution to Peak % = E - D	QF Capacity Adder $/MWh = C x F	QF Prices On-Peak $/MWh = A + G	QF Prices Off-Peak $/MWh = B
2013	Market Based Prices 2013 through 2017							$36.13	$26.69
2014								$39.31	$29.69
2015								$42.56	$31.44
2016								$46.06	$33.34
2017								$49.56	$35.14
2018	$68.27	$50.93	$24.48	5%	5%	0%	$0.00	$68.27	$50.93
2019	$68.45	$53.14	$24.92	5%	5%	0%	$0.00	$68.45	$53.14
2020	$69.52	$54.06	$25.34	5%	5%	0%	$0.00	$69.52	$54.06
2021	$69.00	$57.41	$25.80	5%	5%	0%	$0.00	$69.00	$57.41
2022	$70.15	$58.54	$26.26	5%	5%	0%	$0.00	$70.15	$58.54
2023	$71.36	$59.72	$26.74	5%	5%	0%	$0.00	$71.36	$59.72
2024	$72.45	$60.97	$27.22	5%	5%	0%	$0.00	$72.45	$60.97
2025	$73.68	$62.17	$27.71	5%	5%	0%	$0.00	$73.68	$62.17
2026	$74.94	$63.37	$28.20	5%	5%	0%	$0.00	$74.94	$63.37
2027	$76.09	$64.94	$28.74	5%	5%	0%	$0.00	$76.09	$64.94
2028	$77.58	$66.14	$29.29	5%	5%	0%	$0.00	$77.58	$66.14
2029	$78.79	$67.71	$29.84	5%	5%	0%	$0.00	$78.79	$67.71
2030	$80.15	$69.11	$30.41	5%	5%	0%	$0.00	$80.15	$69.11
2031	$81.92	$70.19	$31.02	5%	5%	0%	$0.00	$81.92	$70.19
2032	$83.23	$71.98	$31.61	5%	5%	0%	$0.00	$83.23	$71.98
2033	$84.62	$73.58	$32.21	5%	5%	0%	$0.00	$84.62	$73.58
2034	$86.28	$75.15	$32.86	5%	5%	0%	$0.00	$86.28	$75.15
2035	$87.77	$76.77	$33.48	5%	5%	0%	$0.00	$87.77	$76.77

Notes:
A&B Based on Pacificorp compliance filing for Order 11-505 (UM 1396)
C Based on Pacificorp Advice 12-005, filed March 2, 2012
D&E Percentage of hours resources are available for contribution to peak, assumed in the utility's IRP

	A	B	C	D	E	F	G	H	I
	Renewable Avoided Resource		Capacity		Solar QF Resource				
Year	Avoided Cost On-Peak $/MWh	Avoided Cost Off-Peak $/MWh	Capital Cost Allocated to Capacity (On-Peak Hours) $/MWh	Renewable Proxy Resource Contribution to Peak %	QF Resource Contribution to Peak %	QF Incremental Capacity Contribution to Peak % = E - D	QF Capacity Adder $/MWh = C x F	QF Prices On-Peak $/MWh = A + G	QF Prices Off-Peak $/MWh = B
2013	Market Based Prices 2013 through 2017							$36.13	$26.69
2014								$39.31	$29.69
2015								$42.56	$31.44
2016								$46.06	$33.34
2017								$49.56	$35.14
2018	$68.27	$50.93	$24.48	5%	30%	25%	$6.12	$74.39	$50.93
2019	$68.45	$53.14	$24.92	5%	30%	25%	$6.23	$74.68	$53.14
2020	$69.52	$54.06	$25.34	5%	30%	25%	$6.34	$75.86	$54.06
2021	$69.00	$57.41	$25.80	5%	30%	25%	$6.45	$75.45	$57.41
2022	$70.15	$58.54	$26.26	5%	30%	25%	$6.57	$76.72	$58.54
2023	$71.36	$59.72	$26.74	5%	30%	25%	$6.69	$78.05	$59.72
2024	$72.45	$60.97	$27.22	5%	30%	25%	$6.81	$79.26	$60.97
2025	$73.68	$62.17	$27.71	5%	30%	25%	$6.93	$80.61	$62.17
2026	$74.94	$63.37	$28.20	5%	30%	25%	$7.05	$81.99	$63.37
2027	$76.09	$64.94	$28.74	5%	30%	25%	$7.19	$83.28	$64.94
2028	$77.58	$66.14	$29.29	5%	30%	25%	$7.32	$84.90	$66.14
2029	$78.79	$67.71	$29.84	5%	30%	25%	$7.46	$86.25	$67.71
2030	$80.15	$69.11	$30.41	5%	30%	25%	$7.60	$87.75	$69.11
2031	$81.92	$70.19	$31.02	5%	30%	25%	$7.76	$89.68	$70.19
2032	$83.23	$71.98	$31.61	5%	30%	25%	$7.90	$91.13	$71.98
2033	$84.62	$73.58	$32.21	5%	30%	25%	$8.05	$92.67	$73.58
2034	$86.28	$75.15	$32.86	5%	30%	25%	$8.22	$94.50	$75.15
2035	$87.77	$76.77	$33.48	5%	30%	25%	$8.37	$96.14	$76.77

Notes:
A&B Based on Pacificorp compliance filing for Order 11-505 (UM 1396)
C Based on Pacificorp Advice 12-005, filed March 2, 2012
D&E Percentage of hours resources are available for contribution to peak, assumed in the utility's IRP

	A	B	C	D	E	F	G	H	I
	Renewable Avoided Resource		Capacity		Baseload QF Resource				
Year	Avoided Cost On-Peak $/MWh	Avoided Cost Off-Peak $/MWh	Capital Cost Allocated to Capacity (On-Peak Hours) $/MWh	Renewable Proxy Resource Contribution to Peak %	QF Resource Contribution to Peak %	QF Incremental Capacity Contribution to Peak % = E - D	QF Capacity Adder $/MWh = C x F	QF Prices On-Peak $/MWh = A + G	QF Prices Off-Peak $/MWh = B
2013	Market Based Prices 2013 through 2017							$36.13	$26.69
2014								$39.31	$29.69
2015								$42.56	$31.44
2016								$46.06	$33.34
2017								$49.56	$35.14
2018	$68.27	$50.93	$24.48	5%	100%	95%	$23.26	$91.53	$50.93
2019	$68.45	$53.14	$24.92	5%	100%	95%	$23.67	$92.12	$53.14
2020	$69.52	$54.06	$25.34	5%	100%	95%	$24.07	$93.59	$54.06
2021	$69.00	$57.41	$25.80	5%	100%	95%	$24.51	$93.51	$57.41
2022	$70.15	$58.54	$26.26	5%	100%	95%	$24.95	$95.10	$58.54
2023	$71.36	$59.72	$26.74	5%	100%	95%	$25.40	$96.76	$59.72
2024	$72.45	$60.97	$27.22	5%	100%	95%	$25.86	$98.31	$60.97
2025	$73.68	$62.17	$27.71	5%	100%	95%	$26.32	$100.00	$62.17
2026	$74.94	$63.37	$28.20	5%	100%	95%	$26.79	$101.73	$63.37
2027	$76.09	$64.94	$28.74	5%	100%	95%	$27.30	$103.39	$64.94
2028	$77.58	$66.14	$29.29	5%	100%	95%	$27.83	$105.41	$66.14
2029	$78.79	$67.71	$29.84	5%	100%	95%	$28.35	$107.14	$67.71
2030	$80.15	$69.11	$30.41	5%	100%	95%	$28.89	$109.04	$69.11
2031	$81.92	$70.19	$31.02	5%	100%	95%	$29.47	$111.39	$70.19
2032	$83.23	$71.98	$31.61	5%	100%	95%	$30.03	$113.26	$71.98
2033	$84.62	$73.58	$32.21	5%	100%	95%	$30.60	$115.22	$73.58
2034	$86.28	$75.15	$32.86	5%	100%	95%	$31.22	$117.50	$75.15
2035	$87.77	$76.77	$33.48	5%	100%	95%	$31.81	$119.58	$76.77

Notes:
A&B Based on Pacificorp compliance filing for Order 11-505 (UM 1396)
C Based on Pacificorp Advice 12-005, filed March 2, 2012
D&E Percentage of hours resources are available for contribution to peak, assumed in the utility's IRP

Explanation of Tables 1, 2 and 3 in Exhibit Staff/103

This Exhibit illustrates staff's proposed Renewable Avoided Cost calculation methods for a wind, solar and baseload QF. Staff used values from PacifiCorp's February 2012 compliance filing in UM 1396. However, these sample calculations are intended only to illustrate the methodology, not to represent any specific proposal.

Table 1 shows a sample renewable avoided price calculation for a hypothetical wind QF. The avoided resource is the renewable resource identified in the IRP (assumed to be wind in this example). Columns A and B show the avoided cost of the assumed wind resource. As in the Standard avoided cost price stream the avoided costs are assigned to on and off peak hours, and the on-peak price includes an implicit capacity contribution.

Column C is the value (to the utility) of capacity, taken directly from the Standard Oregon Method. Column D is the assumed capacity contribution to peak of the utility's *avoided* renewable resource (assumed to be 5% for wind, consistent with Exhibit 102). Column E is the capacity contribution of the wind QF, which we assigned the same value as the utility's avoided wind resource. Thus there is no *additional* capacity contribution from the QF relative to the avoided resource. The resulting on-peak and off-peak prices are the fixed costs of the utility's avoided wind resource, allocated to on and off peak periods. The results are in columns H and I.

Table 2 of the exhibit demonstrates the capacity adjustment for a hypothetical solar QF. Columns A through D are the same as Table 1. Column E shows an assumed capacity contribution for the hypothetical solar QF. (This example uses a 30% solar capacity contribution as a placeholder. The actual solar capacity contribution would come from the utility's IRP.)

In column F we subtract the avoided wind resource capacity contribution from that of the assumed solar capacity contribution. This is the incremental capacity contribution provided by the solar QF, relative to the capacity contributed by the *avoided* renewable resource.

We multiply this incremental contribution by the dollar value of capacity (column C) to arrive at the avoided capacity cost included in the on-peak price. The product, shown in column G, is a "capacity adder" and is included in the total on-peak price for the solar QF (Column H.)

Table 3 shows the same calculation for a baseload renewable QF. We assign the base load QF the same capacity contribution to peak load as an avoided baseload resource (we used 100% for illustration purposes). Its *incremental* capacity contribution, relative to the avoided renewable resource, is again shown in column F. In column G we multiply that incremental capacity contribution by its value to the utility (from column C) to arrive at a capacity adder. Columns H and I again show the resulting renewable avoided cost prices.

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing Motion for Clarification via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

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