

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1452

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION)	
OF OREGON)	Opening Comments of
)	The Environmental Law
Investigation into Pilot Programs to)	Alliance Worldwide (ELAW)
demonstrate the use and effectiveness of)	
Volumetric Incentive Rates for Solar)	
Photovoltaic Energy Systems.)	

The Environmental Law Alliance Worldwide (ELAW) appreciates the opportunity to participate in the process to develop a strong solar energy program for Oregon. The PUC staff has done a tremendous job working with a large group of stakeholders to develop a very good proposal for implementing HB 3039, and ELAW appreciates the staff's efforts.

ELAW concurs with the opening comments made by the OREP coalition and has signed onto those comments. In our own comments ELAW only addresses additional issues and adds to a few comments made in the OREP coalition comments.

Feed-in Tariff Model

As a member of the staff of ELAW, I work with advocates around the world who are designing renewable energy policies. I firmly believe that "feed-in tariff" (FIT) programs are the best policies for generating renewable energy. They have proven to be effective and efficient. They encourage distributed generation of clean energy. A well-designed feed-in tariff would benefit the environment, create jobs, provide income to Oregonians who generate electricity, and provide benefits to Oregon's transmission system.

HB 3039 gives Oregon its first chance to test a FIT to learn whether it is a good program for encouraging the generation of renewable energy in this state.

A press release issued by the governor's office on July 22, 2009, stated the following in referring to HB 3039:

"Today Governor Ted Kulongoski signed into law a series of bills comprising an aggressive climate change package that will reduce greenhouse gas emissions, ensure low carbon fuel, invest in green technology and jobs and increase energy efficiency in homes and businesses across the state. . . .

The series of bills the Governor signed into law today include: . . . House Bill 3039- [which] [d]irects the PUC to develop a pilot program to integrate 25 megawatts of small scale solar energy into Oregon's electricity mix using a *feed-in tariff*. . . ."

http://governor.oregon.gov/Gov/P2009/press_072209.shtml (emphasis added).

The web site of Friends of Tobias Read includes a statement by Representative Tobias Read, the Chair of the Committee that sponsored HB 3039, which states:

"This year we advanced Oregon's green economy by jumpstarting Oregon's solar industry with a *feed-in tariff* to support those who wish to add solar installations to their home or business."

<http://www.tobiasread.com/cgi-bin/display.cgi?page=issues> (emphasis added). (A similar statement is made in Representative Read's "End of Session Wrap Up" video, which can be viewed at <http://www.tobiasread.com/>).

I urge the Commissioners to adhere to the legislature's intent in enacting HB 3039 and design a FIT program for Oregon. Some people have called for net metering or a bidding process. These approaches have their place in Oregon's energy policies. However, in implementing HB 3039, the PUC should craft a true FIT-like program that pays Oregonians for 100% of the electricity they generate at a rate that covers the cost of generation plus a reasonable rate of return.

Federal Preemption

A question was raised about whether the solar pilot programs created under HB 3039 would be preempted by federal law. The PUC staff postponed further development of the program while it investigated this issue. ELAW has been researching federal preemption and has participated in the PUC process addressing the issue. ELAW concurs with the OREP coalition comments on this point, and provides further comments on these critical issues.

I have been studying the relationship between federal law and states' efforts to increase distributed renewable energy for many months. I have been communicating with experts on these issues across the country. I firmly believe that Oregon has the authority to design a strong renewable energy program that is not preempted by federal law. There are several ways that the PUC could move forward with a strong feed-in tariff program that would not be preempted. ELAW recommends one of the following paths:

1. Utilities pay avoided cost for the electricity purchased, and also provide an incentive payment for every kWh of electricity generated under the program during the 15-year contract period.

Federal law should not preempt these incentive payments. Using this incentive payment route could have the added benefit of reducing the rate that would need to be paid to

generators if the incentive payment is non-taxable income under IRS regulations (the tax consequences of these incentive payments would need to be investigated further).

2. Utilities pay avoided cost for the electricity purchased and pay a set price for the renewable energy certificate (REC) that is associated with the electricity generated under this program for the 15-year contract period.

The PUC has the authority to set the price of the electricity itself at avoided cost rates, and require the utility to purchase the accompanying renewable energy certificate (REC) at a rate that would reflect the environmental and social value of generating distributed renewable energy under the pilot program. The value of the REC could be set to cover the cost of generation plus a reasonable rate of return for the generator for the fifteen years of the incentive payment contract period.

The Oregon Department of Energy regulations define a REC as the:

“unique representation of the environmental, economic, and social benefits associated with the generation of electricity from renewable energy sources that produce Qualifying Electricity. . . . While a Certificate is always directly associated with the generation of one MWh of electricity, transactions for Certificates may be conducted independently of transactions for the associated electricity.” OAR 330-160-0015(8).

The California Attorney General’s office published an opinion declaring that California has the authority to use the REC market to establish a feed-in tariff program. See, California Attorney General’s Response to ALG’s Request for Briefs Regarding Jurisdiction to Set Prices for a Feed-In Tariff (June 25, 2000), http://ag.ca.gov/globalwarming/pdf/feed_in_tariffs.pdf.

Furthermore, in an order granting a petition for declaratory order, FERC granted a request for a declaratory order finding that “the Commission’s own avoided cost regulations did not contemplate the existence of RECs.” In its discussion, FERC notes that the avoided costs do not take into consideration the environmental attributes of the energy sold to the utility. The avoided cost rate is the same for energy produced from a fossil-fuel cogeneration facility or a renewable energy small power production facility. FERC then states, “[t]he avoided cost rates, in short, are not intended to compensate the QF for more than capacity and energy.” American Ref-Fuel Co., 105 FERC ¶ 61,004 (Oct. 1 2003) at para. 22.

In the order, FERC continues on to state that “RECs are relatively recent creations of the States. . . . They exist outside the confines of PURPA. PURPA thus does not address the ownership of RECs. And the contracts for the sales of QF capacity and energy, entered into pursuant to PURPA, likewise do not control the ownership of RECs. . . . States, in creating RECs, have the power to determine who owns the REC in the initial instance, and how they may be sold or traded; it is not an issue controlled by PURPA.” *Id.* at para. 23.

Either of these program designs (incentive payments or REC payments) would stay true to the FIT model.

PUC staff and other stakeholders have put forward a different solution that does not stay true to the FIT model and has drawbacks. PUC staff have proposed using net metering plus a volumetric incentive rate payment, and a bidding process to ensure the program is not preempted by federal law. While this proposal is creative, ELAW believes that it has a few drawbacks.

Under the net metering proposal, generators could only be paid the full incentive rate for generation that does not exceed consumption at the particular facility. This approach could artificially limit the size of systems installed or make it impractical for the owners of Oregon's most energy efficient homes to implement. It could also introduce a perverse incentive to consume more energy. I am sure that PUC staff will work to design a program that will not encourage more energy use, but as the program has been presented to date, generators would essentially be paid to consume more electricity if they generated more than they consumed in a billing-cycle. Homeowners who have generated more than they consumed would be encouraged (paid well) to turn up their heat or air conditioning at the end of their billing-cycle or lose the excess generation and the associated payment to the utility or charity (or get paid nothing more than avoided cost for the generation).

Requiring utilities to pay an incentive payment or a set price for the REC would be the most straightforward means of implementing this program without running into questions about federal preemption.

Permanently Installed

Oregon's program must aim to encourage the permanent installation of PV systems. I cannot believe that the legislature intended to have Oregon ratepayers pay a premium price for electricity generated from PV systems for fifteen years, and then have that system go off-line. I understand there will be times when a PV system must come off-line for one reason or another, but the program must be designed to encourage permanent installation of PV systems.

There has been discussion about what "permanently installed" means under HB 3039. I assume a legislator reading these words would apply a common-sense meaning to the words – meaning that a system would be in place for the duration of its useful life.

An internet search for "permanently installed pv" generated the following three references almost instantly. As you will see, each of these programs define permanency of a system to have two meanings: that the system is attached to a permanent structure (or otherwise not mobile), and that the system is in place for the duration of its useful life. I would assume the legislature intended both of these meanings as well, and I recommend that Oregon's program reflect both of these meanings.

- From the City of Palo Alto Utilities (CPAU)'s 2009 PV Partners Program Guidebook:

Performance and Permanency

Equipment is intended to be in place for the duration of its useful life. Only permanently installed systems are eligible for incentives. This means that the *PV system must demonstrate* adequate assurances of both physical and ***contractual permanence*** prior to receiving an incentive. Physical permanence is to be demonstrated in accordance with industry practice for permanently installed equipment. Equipment must be secured to a permanent surface. Any indication of portability, including, but not limited to, temporary structures, quick disconnects, unsecured equipment, wheels, carrying handles, dolly, trailer, or platform, will deem the system ineligible.

<http://www.cityofpaloalto.org/civica/filebank/blobdload.asp?BlobID=14980> (emphasis added).

- Modesto Irrigation District's Performance-Based Incentive (PBI) program (a 10-year incentive program) includes the following language related to permanence:

"Location - The PV system must be permanently installed on the same premises where the Customer's electricity demand is located." (pg. 1)

"System Permanence - Customers must certify that PV systems will be maintained and remain operational on the customers premise for a minimum twenty year period." (pg. 2, note this is a 10 year program).

"PV equipment receiving program incentive is ***intended to be in place for the duration of it useful life.*** Systems must be secured to a permanent surface. ***Any*** indication of system portability may deem system ineligible for program incentives." (pg. 3, emphasis added).

http://www.mid.org/rebates/solar/pkts/pv_pbi_program_details.pdf

- California's Go Solar Initiative

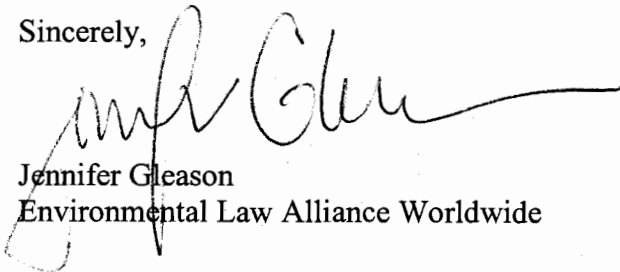
New System Permanence Requirements: Equipment installed under the CSI program is intended to be ***in place for the duration of its useful life.*** Only permanently installed systems are eligible for incentives. This means that the PV system must demonstrate to the satisfaction of the Program Administrator adequate assurances of both physical ***and contractual permanence*** prior to receiving an incentive. The CPUC will provide more information on this requirement via this website and the program handbook before January 1, 2007.

http://www.gosolarcalifornia.com/news/program_updates/2006-12-15_PROGRAM_TRANSITION.PDF (emphasis added).

Oregon's rules as currently drafted state the systems must be permanently installed (OAR 860-084-0120 (1)(b)), but then provide generators with an option to uninstall the system at the end of the contract (OAR 860-084-0240 (2)(b)). While the program needs to accommodate systems that must come off-line for one reason or another, the rules should encourage systems to go off-line after the incentive payment period ends.

Thank you for the chance to participate in this process and for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Gleason", with a long horizontal flourish extending to the right.

Jennifer Gleason
Environmental Law Alliance Worldwide

CERTIFICATE OF SERVICE

I certify that on January 14, 2010, a true and correct copy of the Environmental Law Alliance Worldwide's opening comments in PUC docket UM 1452 was served on the parties listed below. Service was by First Class U.S. mail to all parties unless they have waived paper service. Service to parties who waived paper service (indicated by W) was by electronic mail.

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