

Oregon Renewable Energy Working Group

Key Topics Not Addressed at Previous Meeting

1) Renewable Energy Credit Banking

Debate on this topic happened in Hood River, and the original draft was revised to differentiate between bundled and unbundled RECs. The resulting compromise language has not been discussed. Are there concerns with the language, and what are those concerns?

2) Compliance Procedures

The compliance procedure section was substantially revised from the original draft. No debate occurred at the last meeting on this. Are there concerns with the procedural elements in the outline, and are there additional elements missing from the document?

3) Legal Issue Related to PUD's

OPUDA brought forward a list of changes to Oregon statute to address concerns it has with the PUD's being able to meet a RPS-style mandate. Were there objections to those modifications or concerns that should be noted?

4) Primary vs. Secondary Standard Interaction Effects

A problem whereby affected entities in the Secondary standard might get hit harder than those in the Primary in some situations was identified at the Hood River meeting. A proposal was made to allow for an "opt in" from the Secondary into the Primary, and that proposal was incorporated. At the last meeting another method was proposed, but not discussed, which would take the lesser burden of either for any given year. Is that preferable, or does that create problems of predictability? Are there better options?

Broad RPS Topics

Compliance with RPS Obligation in Excess of Load Growth in Primary Standard

Traditionally, unbundled RECs ("green tags") have served as the means to deal with obligations in excess of load growth. Some have expressed concern with this approach. Several have requested discussion on this issue.

- A proposal will be brought forward from Angus Duncan on this topic.

Areas for PUC or ODOE Rulemaking

There are a number of highly complex areas of the RPS proposal where there is concern that in the rush to get something through session serious technical flaws may develop or not be addressed. Traditionally an RPS may delegate such topics to PUC rulemaking. Because this proposal involves COUs, if a similar tactic were employed most topics would have to go to ODOE rulemaking, in addition to (or instead of) PUC rulemaking. Staff is aware of the historical sensitivities to rulemaking activity regarding COUs. However, the benefits of addressing key issues through ODOE or PUC rulemaking may outweigh some of these concerns. Are there areas of the RPS that the group feels should be left to rulemaking rather than try and nail down in detail in the bill language itself?

- One example may be computation procedures for the firm FBS exemption.