

Oregon Clean Power Plan Evaluation Criteria -

DRAFT: December 8, 2015

The following criteria were developed by staff at the Oregon Department of Environmental Quality, Department of Energy, and the Public Utility Commission for use in Oregon's early evaluation of options to comply with EPA's Clean Power Plan. Input received during initial stakeholder meetings held in late August thru September informed the initial development of these criteria. These criteria were revised based on input received during a large stakeholder meeting on October 27, 2015. Further revisions may result based on additional stakeholder input.

Compliance with the requirements of EPA's Clean Power Plan and reliability of the electricity system are ~~is~~ not included in the criteria below. Oregon agencies consider compliance with EPA's regulation and maintaining the reliability of the electricity system as prerequisites of any compliance option worth exploring. ~~Compliance options that would compromise either Oregon's compliance with the requirements of the Clean Power Plan or the reliability of the electricity system will not be dropped from further consideration regardless of how they may perform against the criteria listed below.~~

Criterion: **Cost and long-term risk to Oregon utility rate payers**

This accounts for the degree and distribution of impacts to Oregon electric utility rates, as well as ~~the~~ other long-term cost risk of further impact to these utility rates, as a result of Oregon's plan. Long-term cost risk includes the potential for additional carbon regulation of the power sector at the state or federal levels.

Criterion: **Effect on CO2 emissions**

This accounts for expected changes in CO2 emissions in Oregon and nationally as a result of Oregon's compliance approach.

Criterion: **Cost to Oregon energy suppliers**

This accounts for direct costs to companies operating in Oregon that sell electricity, including utilities, ~~selling to retail customers and~~ independent power producers, and power marketers selling power services in Oregon. ~~output from Oregon power plants on the wholesale market.~~

~~Criterion: **Effect on reliability of electricity system**~~

~~*This accounts for potential impacts on the reliability of the state, regional, and national electric system.*~~

Criterion: **Administrative requirements**

This accounts for the cost and complexity of administering the compliance programs in Oregon's plan for both Oregon agencies and directly affected parties such as regulated entities and providers of renewable energy or energy efficiency.

Criterion: **Connections with other policies**

This accounts for the degree to which the compliance programs in Oregon’s plan would complement, duplicate, or conflict with existing or potential future state policies affecting the power sector.

Criterion: Environmental Justice

This accounts for the degree to which the compliance programs in Oregon’s plan would disproportionately affect low-income or other vulnerable communities in Oregon.

Criterion: Economic impact

This accounts for the degree to which the compliance programs in Oregon’s plan would affect statewide economic development.