

Comments of
Oregon Rural Electric Cooperatives Association
1750 Liberty Street SE
Salem, Oregon 97302
(503) 585-9988
December 11, 2007

RE: Proposed Rules – Establishing a Renewable Energy Certificate System for the Oregon Renewable Portfolio Standard (SB 838)

ORECA appreciates the opportunity to comment on behalf of our members' to the Oregon Department of Energy's draft proposed rules to implement SB 838.

ORECA is an association representing seventeen Consumer-Owned Utilities across the state. ORECA was instrumental in the final legislative effort for SB 838 and as such is very interested in the proposed rulemaking related to this Bill. Specifically, to the proposed rule of establishing a renewable energy certificate system that will function for all participants, including those smaller consumer-owned utilities which may not fall under the standard until 2025.

Specific comments critical to our members include:

1. We support an effective date for insuring Environmentally Preferred Power (EPP) purchased by our members' since passage of the Bill qualify for compliance with the RPS. We are in agreement with OMEU's comments on this issue and also believe the October 1, 2007 effective date (or earlier) to be consistent with our members' on-going efforts to bank portions of their purchases to meet future RPS obligations.
2. We can support the use of the Western Renewable Energy Generation Information System (WREGIS) in so far that it is utilized successfully in other areas of the country and would provide a consistent methodology to utilize for Oregon's proposed recordkeeping process. However, our support is contingent upon developing a workable solution specific to tracking individual purchases for small consumer-owned utilities involved in this process.
3. The establishment of "sub-accounts" by BPA for holding credits within the WREGIS tracking system is critical. Insuring that all affected utilities are receiving "credit" for their efforts no matter how small, is important to both the individual utilities and their members.

Of immediate concern for this rulemaking is the decision by which utilities receive credit for purchases since passage of the RPS and during rulemaking processes. All things being equal, we can support the "retroactive creation of certificates" using WREGIS operating rules to compensate for these EPP credits since passage of the RPS.

We appreciate the department's efforts to resolve these issues in a fair and reasonable manner to all parties concerned and look forward to continued progress in the rulemaking process.

David Shaw
Oregon Rural Electric Cooperatives Association (ORECA)
1750 Liberty Street SE
Salem, Oregon 97302
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