



CABLE HUSTON<sup>LLP</sup>

June 1, 2018

Oregon Public Utility Commission  
ATTN: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-3612

**Re: 2017 Redacted RPS Compliance Report for 3 Phases Renewables, Inc.;**  
**Docket No: UM 1947**

To Whom It May Concern:

Please find attached 3 Phases Renewables, Inc.'s redacted RPS 2017 Compliance Report. A version of this report that includes the figures redacted here is being sent to Public Utility Commission via FedEx.

Should you have any questions or concerns, please contact me at 503-224-3092.

Thank you,



Richard G. Lorenz

Enclosures

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
UM 1947**

In the Matter of )

3 PHASES RENEWABLES, INC's, )

2017 RPS Compliance Report. )

---

**3 PHASES RENEWABLES, INC'S  
RPS COMPLIANCE REPORT**

**REDACTED 2017 RPS COMPLIANCE REPORT  
FOR  
3 PHASES RENEWABLES, INC**

**June 1, 2018**

**3 Phases Renewables, Inc.  
Renewable Portfolio Standard  
Oregon Compliance Report  
2017**

---

*As an introduction and summary of the Compliance Report, answer the following questions:*

Why is 3 Phases Renewables, Inc. submitting a Compliance Report? What information was used as the basis of this Compliance Report?

*3 Phases Renewables Inc. an OPUC registered Electricity Service Supplier, is submitting a Compliance Report pursuant to OAR 860-083-0350 and ORS 469A.065. 3 Phases Renewables' internal records and WREGIS account were used as the basis for the Report for its 2017 total retail electricity sales in Oregon.*

Did the company meet its Renewable Portfolio Standard (RPS) target, and if not, describe in detail why not?

*Yes, 3 Phases Renewables Inc. has met its 2017 RPS target. The compliance details are provided in this report.*

***2017 RPS Compliance Report***

*Provide the following information in response to the requirements of OAR 860-083-0350:*

<b>OAR 860-083-0350(2)(a)</b>
The total number of megawatt-hours sold to retail electricity consumers covered by ORS 469A.052 by the electric company or sold in the service areas of each electric company covered by ORS 469A.052 by the electricity service supplier.

**Response:**

*A total of [REDACTED] megawatt-hours were sold to Oregon retail consumers in 2017.*

<b>OAR 860-083-0350(2)(b)</b>
The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired in the compliance year and used to meet the renewable portfolio standard.

**Response:**

*A total of [REDACTED] bundled certificates were acquired in the compliance year 2017 that will be used to meet the renewable portfolio standard in compliance year 2017.*

**OAR 860-083-0350(2)(c)**

The total number renewable energy certificates, identified as either unbundled or bundled certificates, acquired on or before March 31 of the year following the compliance year and used to meet the renewable portfolio standard.

**Response:**

*There are [REDACTED] bundled or unbundled certificates acquired on or before March 31, 2018 that are used to meet the renewable portfolio standard for compliance year 2017.*

**OAR 860-083-0350(2)(d)**

The total number and cost of unbundled renewable energy certificates, identified as either banked or non-banked certificates, used to meet the renewable portfolio standard.

**Response:**

*There are [REDACTED] unbundled certificates acquired and/or issued in 2017 that will be used to meet the RPS requirement for compliance year 2017.*

**OAR 860-083-0350(2)(e)**

The total number of banked bundled renewable energy certificates that were used to meet the renewable portfolio standard.

**Response:**

*The total number of banked bundled RECs used to meet the renewable portfolio standard for compliance year 2017 is [REDACTED].*

**OAR 860-083-0350(2)(f)**

The total number of renewable energy certificates, identified as either bundled or unbundled certificates, issued in the compliance year that were banked to serve Oregon electricity consumers.

**Response:**

*There are [REDACTED] bundled certificates that were issued in the compliance year that were banked.*

**OAR 860-083-0350(2)(g)**

For electric companies, unless otherwise provided under subsection (2)(k) of this rule, the total number of renewable energy certificates included in the rates of Oregon retail electricity consumers that were sold since the last compliance report, including:  
 (A) The names of the associated generating facilities; and  
 (B) For each facility, the year or years the renewable energy certificates were issued.

**Response:**

*3 Phases Renewables is an electricity service supplier; therefore this requirement is not applicable.*

Generating Facility Name	Year(s) RECs Issued
N/A	N/A

**OAR 860-083-0350(2)(h)**

Unless otherwise provided under subsection (2)(k) of this rule, for each generating facility associated with the renewable energy certificates included in subsections (2)(b), (c), (f), or (g) of this rule the following information:  
 (A) The name of the facility;  
 (B) The county and state where the facility is located;  
 (C) The type of renewable resource;  
 (D) The total nameplate megawatt capacity of the facility;  
 (E) For an electric company, the Oregon share of the nameplate megawatt capacity of the facility;  
 (F) The year of the first delivery of qualifying electricity or the first year of the contract for the purchase of unbundled renewable energy certificates; and  
 (G) The duration of the contract or the amortization period of a facility owned by the electric company or the planned lifetime of a facility owned by the electricity service supplier.

**Response:**

*Please see table below.*

Table 1 – Bundled RECs								
Facility Name	County	State	Resource Type	Name Plate Capacity	OR Share Nameplate	First Year Delivery	Contract	Duration
				(MW)	(NW)	or		

**OAR 860-083-0350(2)(i)**

The amount of alternative compliance payments the electric company or electricity service supplier elected to use or was required to use to comply with the applicable renewable portfolio standard.

**Response:**

*3 Phases Renewables did not elect to use and was not required to use alternative compliance payments for compliance with the RPS.*

**OAR 860-083-0350(2)(j)**

For an electric company, sufficient data, documentation, and other information to demonstrate that any voluntary alternative compliance payments were a reasonable compliance method.

**Response:**

*3 Phases Renewables is an electricity service supplier; therefore this requirement is not applicable.*

**OAR 860-083-0350(2)(k)**

Documentation of use of renewable energy certificates from the system under OAR 330-160-0020 established for compliance with the applicable renewable portfolio standard.

**Response:**

*The attached WREGIS report (Confidential Attachment A) shows all RECs to be used to meet the 2017 RPS. The RECs are currently in an active sub-account [REDACTED]. Upon Commission approval of the 2017 RPS Compliance Report, these RECs will be retired to a retirement sub-account [REDACTED]. To validate compliance, 3 Phases Renewables will then send a retirement report from WREGIS to the Commission.*

**OAR 860-083-0350(2)(l)**

For each electric company, a detailed explanation of any material deviations from the applicable implementation plan filed under OAR 860-083-0400, as acknowledged by the Commission.

**Response:**

*3 Phases Renewables is an electricity service supplier; therefore this requirement is not applicable.*

<b>OAR 860-083-0350(2)(m)</b>
As specified in OAR 860-083-0100, the total number and cost of bundled renewable energy certificates used for compliance.

**Response:**

*Please see table below.*

<b>Table 2 - The Total Number and Cost of Bundled RECs Used for Compliance</b>		
Facility Name	Nro. of RECs	Total Cost
[Redacted Data]		

<b>OAR 860-083-0350(2)(n)</b>
For each electric company, its projected annual revenue requirement as calculated in OAR 860-083-0200 and its total cost of compliance.

**Response:**

*3 Phases Renewables is an electricity service supplier; therefore this requirement is not applicable.*

<b>OAR 860-083-0350(2)(o)</b>
For each electricity service supplier, its total cost of compliance, its average cost of compliance, and its cost limit as specified in OAR 860-083-0300(2), including all calculations.

**Response:**

*Please see table below.*

<b>Table 3 - Total Cost of Compliance, Average Cost of Compliance and Cost Limit</b>		
[Redacted Data]		



**OAR 860-083-0350(2)(p)**

For each electric company, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in ORS 469A.100(1) is reached for the compliance year.

**Response:**

*3 Phases Renewables is an electricity service supplier; therefore this requirement is not applicable.*

**OAR 860-083-0350(2)(q)**

For each electricity service supplier, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in OAR 860-083-0300(2) is reached for the compliance year.

**Response:**

*Not Applicable.*

**OAR 860-083-0350(2)(r)**

As specified in OAR 860-083-0100, the number and total cost of all bundled renewable energy certificates issued.

**Response:**

■■■■ RECs and a total cost of ■■■■

**OAR 860-083-0350(2)(s)**

As specified in OAR 860-083-0100, the number and total cost of bundled renewable energy certificates issued that are associated with new qualifying electricity since the last compliance report.

**Response:**

*Not Applicable.*



**OAR 860-083-0350(6)**

Each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must post on its web site the public portion of the four most recent annual compliance reports required under this rule and provide a copy of the most recent such report to any person upon request. The public portions of the most recent compliance report must be posted within 30 days of the Commission decision in section (5) of this rule. The posting must include any Commission determinations under section (5) of this rule.

**Response:**

*3 Phases Renewables will post its compliance report within 30 days of a Commission Decision.*

**OAR 860-083-0350(7)**

Consistent with Commission orders for disclosure under OAR 860-038-0300, each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must provide information about its compliance report to its customers by bill insert or other Commission-approved method. The information must be provided within 90 days of the Commission decision in section (5) of this rule or coordinated with the next available insert required under OAR 860-038-0300. The information must include the URL address for the compliance reports posted under section (6) of this rule.

**Response:**

*3 Phases Renewables will comply within 90 days of a Commission Decision.*

