



February 12, 2014

The Honorable Greg Smith
900 Court St. NE, H-482
Salem, Oregon 97301

RE: House Bill 4126 – Oppose Unless Amended

Dear Representative Smith,

Noble Americas Energy Solutions LLC (“Noble Solutions”), a San Diego based retail energy service provider, is writing to express our opposition to your bill, unless amended, HB 4126.

Under Oregon’s landmark electricity restructuring law, SB 1149, Noble Solutions has been an active electricity service supplier in Oregon for over a decade¹. We serve schools, hospitals, cities, and industrial customers located within Portland General and Pacific Power’s electric service territories. We help bring to our Oregon customers energy budget certainty, energy cost savings and access to renewable energy technologies of their choice. We compete with other electricity service suppliers for this business.

Unfortunately, certain language in your bill could become a vehicle for mischief and confusion, specifically Section 3(5). Section 3 instructs the Public Utility Commission to weigh several relevant factors and consider whether it is in the public interest to authorize Portland General and PacifiCorp to develop a renewable energy tariff that would compete directly with competitive market offerings. However, the incumbent utilities may attempt to rely on confusion created by Subsection (5) as a basis to create an unlevel playing field between the monopoly investor owned utilities and the competitive market entities attempting to innovate and bring the benefits of retail electric competition to the businesses and institutions of Oregon. The legislation should strive to avoid confusion and any risk of unfair competition that would increase costs to all utility ratepayers.

Noble Solutions urges you to strike Section 3(5).

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Wood', with a large, stylized flourish at the end.

James Wood – President, Noble Americas Energy Solutions LLC

cc: Senator Michael Dembrow – Chairman Committee on Environment and Natural Resources
Senator Lee Beyer – Chairman Committee on Business and Transportation

¹ Noble Solutions is formerly known as Sempra Energy Solutions.