

June 2, 2020

Public Utility Commission of Oregon Attn: Filing Center 201 High Street, S.E. P.O. Box 1088 Salem, OR 97308-1088

RE: UM 1856 PGE's Energy Storage Anderson Readiness Center Procurement Proposal

Pursuant to Oregon Public Utility Commission (OPUC or Commission) Order Nos. 16-504 and 18-290, Portland General Electric Company's (PGE's) invites Staff and Stakeholders to offer comments on PGE's intent to leverage the already approved request for proposal (RFP) filed with the Commission May 3, 2019 for the Beaverton Public Safety Center (BPSC) to procure the Anderson Readiness Center (ARC) by June 23, 2020.

For the ARC project PGE will request a project specific proposal from the equipment vendor selected in the microgrid RFP conducted last year. This proposal request will include the same requirements of the RFP filed for the BPSC project with the exception of a few project-specific changes for ARC:

- 500 kW power rating (compared to 250 kW at BPSC)
- Equipment layout and interface details specific to the ARC site
- An updated schedule for the ARC project

PGE does not intend to conduct an additional competitive solicitation for the procurement of the Battery Energy Storage Systems and Microgrid Controller (BESS) for the Anderson Readiness Center Microgrid (ARC) project. Instead, PGE believes that the similarities between the Beaverton Public Safety Center Microgrid (BPSC) project and the ARC project justify the use of the existing RFP evaluation results for the equipment vendor selection for both projects. An updated pricing proposal will be requested from the vendor, specific to the ARC project based on the terms and conditions already negotiated for the BPSC project.

A competitive solicitation was already completed for the BESS equipment for the BPSC project. Prior to conducting this solicitation, the BPSC RFP was posted to UM1856 for review and it did not receive any comments or input from Staff or Stakeholders. The RFP process that followed took approximately four months from issuing the RFP to finalizing the agreement and issuing a Purchase Order for the BESS.

The BPSC RFP resulted in 6 bidder submitted proposals. Each proposal was evaluated, scored, and the top bidder was selected to proceed in the process. The pricing, terms and conditions, and services agreement were negotiated with the selected vendor for the BPSC procurement. This effort was completed with the intent that PGE would be able to utilize these efforts on future microgrid projects. The scope for the ARC project is nearly identical to the BPSC project, with the exception that the ARC project will have a power rating of 500 kW vs the 250 kW for the BPSC project.

History of Energy Storage Docket

The Commission opened Docket No. UM 1751, in September 2015, to implement recently passed legislation, House Bill 2193. House Bill 2193 requires PGE and PacifiCorp to submit proposals by January 1, 2018, for qualifying energy storage systems with capacity to store at least five megawatt hours. In Commission Order 16-504, the Commission adopted guidelines and requirements for energy storage project proposals, in late 2016, and a framework for PAC's and PGE's Energy Storage Potential Evaluations.

PGE filed its Energy Storage Proposal and Final Potential Evaluation on November 1, 2017, which were investigated in UM 1856. Pursuant to Commission Order No. 18-290, filed in UM 1856 on October 25, 2018, PGE filed its plan to advance its energy storage modeling capability. On April 9, 2019, Staff approved this filing via electronic mail, enabling the Microgrid pilot to move forward.

In May of 2019 PGE sought stakeholder input to the RFP design for an energy storage system used in the Microgrid pilot for BPSC. The Commission's competitive bidding requirements for House Bill 2193 projects are as follows:

- 1. An electric company may award a contract for a project without competition if it determines and presents justification that only a single vendor or contractor is capable of meeting the requirements of the project.
- 2. Where the requirements for sole source procurement are unmet, electric companies must use a competitive process to award contracts.
 - a. The electric companies will bear the burden of demonstrating that they followed a fair, competitive solicitation process to identify all vendors with the requisite expertise, experience, and capability to install viable projects.
 - b. <u>The electric companies must give the Commission and stakeholders the opportunity to review the electric companies' RFP design and offer nonbinding input (emphasis added).</u>
 - c. The electric companies must summarize and report to the Commission their solicitation process and scoring approach. The report should be included with the formal project proposal submitted to the Commission, or, if bidding occurs after Commission authorization, at a special public meeting to follow.

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PGE is seeking stakeholder feedback within the next 15 days. Feedback should be directed to: puc.filingcenter@state.or.us

Please direct any questions or comments regarding this filing, to Christopher Pleasant at (503) 464-2555.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane Manager, Pricing and Tariffs

cc: UM 1856 Service List