



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
503-464-7822 • Facsimile 503-464-2200

Loretta I. Mabinton
Associate General Counsel

May 14, 2018

Via Electronic Filing

Oregon Public Utility Commission
Attention: Filing Center
201 High Street, Ste. 100
Salem OR 97301-3612

Re: UM 1934- Portland General Electric Company's 2018 Request for Proposals for
Renewable Resources

Attention Filing Center:

Enclosed for filing is Portland General Electric Company's Comments on NIPPC's May 11,
2018 "Response".

Sincerely,

A handwritten signature in blue ink that reads "Loretta Mabinton". The signature is written in a cursive, flowing style.

Loretta Mabinton
Associate General Counsel

LIM: sj

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1934

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

2018 Request for Proposals for Renewable
Resources.

**COMMENTS OF PORTLAND
GENERAL ELECTRIC
COMPANY ON NIPPC's
"RESPONSE"**

At approximately 5 p.m. on Friday May 11, 2018 the Northwest Intermountain Power Producers Coalition ("NIPPC") filed an "Updated Status Matrix" purportedly in response to Portland General Electric Company's (PGE) May 8 filing. NIPPC's filing was not requested, and is not required by, or necessary for, the Commission's established process or by the subsequent direction from the Administrative Law Judge.

I. INTRODUCTION

On February 22, 2018, PGE filed a pre-issuance Draft of its 2018 Renewable RFP. On March 2, 2018 PGE conducted stakeholder workshops. The Draft Final RFP incorporated feedback from the Independent Evaluator (IE) and stakeholders and was released on March 9, 2018. On March 14, 2018 at a pre-hearing conference, the parties agreed to a schedule that was designed to enable PGE to obtain maximum tax credit benefits on behalf of customers. At NIPPC's request, the due date of the IE's assessment was delayed to allow IE review of stakeholders' comments on the Draft Final RFP prior to issuing its Assessment. On May 6, ALJ Rowe issued a detailed agenda for the Commission's May 8, 2018 Regular Public Meeting, and included a request for PGE to circulate an issues matrix. At the meeting the Commission

directed PGE to file the redline of its RFP, and the IE to file additional comments ahead of the Commission's Special Public Meeting on May 16, 2018.

II. COMMENT

At the May 8, 2018 Regular Public Meeting, NIPPC was provided the same opportunity as all other parties to share its positions with the Commission. NIPPC did not seek, and the Commission did not grant NIPPC leave to provide additional comments. Neither did the Commission grant any other person (other than the IE) the right to file additional comments. By filing its 'response', NIPPC is attempting to grant itself the opportunity to continue to advocate, which is more than any other party has been afforded. Further, by choosing to file at the very end of the Commission's process, NIPPC tactics provide little to no opportunity for parties to respond. The Commission's process is designed to provide equal opportunity for parties to provide comment, and reasonable time for parties to respond. It is therefore unacceptable for NIPPC to provide unrequested, supplemental comments. This is an abuse of the Commission's process.

If NIPPC sincerely desired an opportunity for additional comments, NIPPC had ample opportunity to request additional time within the Commission's established schedule and process. NIPPC participated actively in the Scheduling Conference on March 4, 2018, and agreed to the schedule that the ALJ adopted in this proceeding. The Commission's Scheduling Order in this docket is very clear. Rather, NIPPC chose a late Friday filing *after* the Commission had received the parties' comments at the Public Meeting. NIPPC's tactics appear designed to introduce confusion and ultimately jeopardize the schedule necessary to capture the benefits of

expiring federal tax credits for PGE's customers. NIPPC's tactics abuse the Commission's process and should not be tolerated by the Commission.

The Commission's and ALJ's directives at the May 8, 2018 Regular Public Meeting were very clear. The directives did not allow for additional party comment. Instead the IE was directed by the Commission to provide final comments. NIPPC's filing impermissibly attempts to appropriate the role the Commission expressly assigned to the IE. NIPPC's filing should be rejected.

III. CONCLUSION

The Commission should disregard NIPPC's 'filing', and proceed with the proceeding in this docket as anticipated by the Schedule and the Commission's directives.

DATED this 14th day of May, 2018.

Respectfully submitted,



Loretta I. Mabinton, OSB#020710
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(503) 464-7822 (phone)
(503) 464-2200 (fax)
loretta.mabinton@pgn.com