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October 30, 2018

Via E-mail and USPS Mail

Public Utility Commission of Oregon

Attn: Filing Center

201 High St. SE, Suite 100

Salem, OR 97301

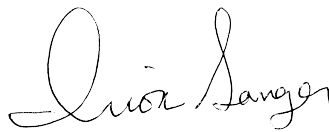
Re: In the Matter of the Complaint of PORTLAND GENERAL ELECTRIC COMPANY,
2018 Request for Proposals for Renewable Resources
Docket No. UM 1934

Dear Filing Center:

Please find enclosed the clean and redline revised pages 2 and 8 for the Northwest and Intermountain Power Producers Initial Comments originally filed on October 25, 2018 to reflect that PGE served its discovery on October 22, 2015, and update the comments to reflect certain information and the status of a potential discovery dispute. The clean pages should replace in their entirety pages 2 and 8 filed on October 25, 2018.

Please let me know if you have any questions.

Sincerely,



Irion Sanger

CLEAN VERSION

PAGES 2 and 8

represents the least-cost and least-risk available resources given that the Production Tax Credit is expiring. Thus, ratepayers will be best served by the Commission acknowledging the short list, which authorizes PGE to begin serious contract negotiations with those bidders.

NIPPC notes that there is a difference in opinion between PGE and the Independent Evaluator (“IE”) regarding the ranking of the final short list bidders.¹ NIPPC represents the interests of the competitive power industry as a whole; thus, NIPPC does not take a position on this issue because it is not NIPPC’s role or purpose to involve itself in opining on the potential winners or losers of any particular RFP.

Finally, NIPPC and PGE are having ongoing discussions around certain discovery responses, and NIPPC may submit comments on new issues later in this process after it is resolved.²

II. BACKGROUND

A. PGE’s Prior RFP (the 2016 RFP) Was Rushed and Flawed

PGE’s current resource acquisition plans began with the passage of Senate Bill (“SB”) 1547, which was signed into law on March 8, 2016 and doubled the state’s renewable portfolio standard obligations and incentivized early resource acquisition. On

¹ IE Report at 4-5.

² PGE served its responses to NIPPC’s data responses on October 22, 2018.

determination.”²¹ This could have improved the Commission’s decision making process, since PGE declined to offer up its own transmission resources in this RFP and refused to provide an explanation of this decision or even proper accounting of its transmission resources in this RFP, its IRP or its 2016 RFP.

III. COMMENTS

A. The Commission Should Acknowledge PGE’s Final Shortlist

PGE’s final short list contains bids from three projects totaling 600 MWs. The projects include a proposed 100 MW wind PPA, a 200 MW wind PPA (which is part of a larger 400 MW project), and the Benchmark, which is a 100 MW build own transfer (“BOT”) and 200 MW PPA.²²

PGE received 26 bids from ten discrete projects, which were primarily wind resources and located in Oregon.²³ Two projects and eight bids failed to meet the bid submittal thresholds. These two projects were eliminated because of interconnection and transmission issues.²⁴ Three more projects were eliminated between the initial and final short list because of interconnection and transmission issues.²⁵ Thus, there were only five projects that were eligible to participate in the RFP based on the interconnection and transmission restrictions.²⁶

NIPPC understands that the Commission may be concerned that, if it had adopted an RFP with less restrictive transmission and interconnection requirements, then there

²¹ Id. at 11.

²² IE Report at 1-2.

²³ PGE Final Request for Acknowledgement of Final Shortlist at 10.

²⁴ IE Report at 12.

²⁵ Id. at 19-20.

²⁶ Id. at 12, 19-20; PGE Final Request for Acknowledgement of Final Shortlist at 10; PGE Response to NIPPC Data Request No. 1.

REDLINE VERSION

PAGES 2 and 8

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