

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1535

In the Matter of)
)
)
PORTLAND GENERAL ELECTRIC)
)
Request for Proposals for Capacity)
Resources)
_____)

**COMMENTS ON THE FINAL DRAFT RFP
OF THE
CITIZENS' UTILITY BOARD OF OREGON**

February 22, 2012



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| PORTLAND GENERAL ELECTRIC |) | COMMENTS ON THE FINAL |
| |) | DRAFT RFP OF THE CITIZENS' |
| Request for Proposals for Capacity Resources |) | UTILITY BOARD OF OREGON |
| _____ |) | |

The Citizens' Utility Board of Oregon (CUB) appreciates the opportunity to comment on the final draft of PGE's Request For Proposals (RFP). CUB is generally pleased with the Independent Evaluator's work on this final draft, and as such believes that the draft as written should lead to a fair and productive bidding process for the resources sought by PGE. There are, however, a few concerns that have been raised by the Industrial Customers of Northwest Utilities (ICNU) and the Northwest and Intermountain Power Producers Council (NIPPC) that CUB agrees need to be addressed.

NIPPC raises issues regarding the need for a more exacting scoring criteria for transmission and the range of technologies that are eligible to be bid in this and future RFPs. CUB feels that both of these requests are reasonable and would be beneficial to include in the final RFP. CUB also shares NIPPC's concern regarding PGE's requirement that bidders possess firm rights to gas transportation and storage. The Commission clearly stated in Order No. 11-371 (page 4) that bidders must have plans for gas transportation and storage. PGE's requirement of firm rights in these bids goes significantly beyond the Commission's directive. Finally, CUB

agrees with both NIPPC and ICNU that intervenors be given the chance to address any change by PGE of its use of imputed debt in this RFP.

CUB believes that the Commission should approve the final draft RFP essentially as written, while giving further consideration to the minor concerns described above.

Respectfully Submitted,
February 22, 2012

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Gordon Feighner
Utility Analyst
Citizens' Utility Board of Oregon

UM 1535 – CERTIFICATE OF SERVICE

I hereby certify that, on this 22nd day of February, 2012, I served the foregoing **COMMENTS ON THE FINAL DRAFT RFP OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1535 upon each party listed in the UM 1535 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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Respectfully submitted,

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