OREGON SOLAR + STORAGE INDUSTRIES ASSOCIATION

Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

June 8, 2021

Dear Staff and Stakeholders,

Oregon Solar+Storage Industries Association (OSSIA) submits these comments regarding the Portland General Electric Company's (PGE) annual avoided cost update filed on May 3, 2021, UM 1728.

Solar Baseline Data Should be Updated in a Comprehensive and Logically Consistent Manner

In PGE's avoided cost update, PGE updates the amount of solar in its baseline portfolio for purposes of calculating the ELCC of solar, yet PGE neither updates the actual or assumed solar performance characteristics for those resources or the assumed performance characteristics for new resources being added in the ELCC calculation. It is logically inconsistent to only update the amount of solar in the baseline without also updating the performance characteristics. This is so because the increased amount of solar in the baseline compounds the outdated assumptions.

For example, instead of having 100 MW of solar resources generating all at the same assumed times and with the same performance characteristics, PGE now reflects that it has 300 MW of solar all generating at the same times and with the same performance characteristics. Solar resource performance characteristics differ by location and technology. As solar is added to the system, the variety of solar resource performance characteristics also changes, i.e., you may end up having more resources located in an area where the solar irradiance may be markedly different than that for other locations.

Here, PGE's 2019 Integrated Resource Plan (IRP) assumed solar performance characteristics for a proxy resource located in Christmas Valley, Oregon (east of the mountains), yet many of PGE's actual resource acquisitions are located in the Willamette Valley (west of the mountains). Solar irradiance is quite different in those areas, so in applying the proxy resource performance characteristics to actual resources, PGE is inappropriately overestimating the contribution that existing solar resources fill its capacity need and underestimating the contribution that new resources can contribute capacity.

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As such, PGE should either:

1. Not update the amount of solar in the baseline until a comprehensive and logically consistent set of data can be fully updated in the next IRP including the costs and performance characteristics of those solar resources, Or
2. If PGE insists on doing its somewhat inaccurate update, then it should also update the solar performance characteristics to reflect the actual performance characteristics of the solar resources in the baseline and update the proxy resource performance characteristics to reflect advances in the technology for new resources being added.

Solar Baseline Data Should be Based on Reasonable Assumptions

PGE's snapshot should include reasonable assumptions about what and how many resources will come online. PGE should assume that something less than 100% will come online and that some projects will have delayed commercial operations. This could include reasonable forecasting assumptions like that which the Renewable Energy Coalition has advocated for in the past in PGE's IRP and other dockets. It could also include reasoned assumptions based on facts known to PGE at the time it makes its snapshot, including by removing projects PGE knows will not reach commercial operations or delaying the assumed commercial operation date for projects PGE knows need more time. Those known facts could also inform a more reasoned forecast of the projected project failures or delays.

As such, PGE should also:

3. Make reasonable assumptions about the amount of solar that will actually achieve commercial operations and the amount that will be delayed in reaching commercial operations.

Including a locational value of solar is something OSSIA has asked for in multiple dockets, for this exact reason. Oregon is not a state where one proxy value can be used for the whole state, since solar performance is very different on the east and west sides of the Cascades. Using one set of proxy values makes the data inaccurate.

OSSIA appreciates the ability to comment and look forward to working with staff to fix this important issue.

Sincerely,

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Executive Director

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