

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1728

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application to Update Schedule 201
Qualifying Facility Information.

JOINT COMMENTS OF THE
RENEWABLE ENERGY COALITION,
THE NORTHWEST & INTERMOUNTAIN
POWER PRODUCERS COALITION, THE
COMMUNITY RENEWABLE ENERGY
ASSOCIATION, AND OREGON SOLAR +
STORAGE INDUSTRIES ASSOCIATION
ON THE 2022 ANNUAL UPDATE

REDACTED

I. INTRODUCTION

The Renewable Energy Coalition, the Northwest & Intermountain Power Producers Coalition, the Community Renewable Energy Association, and the Oregon Solar + Storage Industries Association (together the “QF Trade Associations”) provide these comments on Portland General Electric Company’s (“PGE’s”) 2022 annual update to avoided cost prices. In addition to updating the factors authorized by rule for the annual update in OAR 860-029-0085(4)(a), PGE also proposes an out-of-cycle update to the capacity contribution value for solar qualifying facilities (“QFs”) that would normally only be allowed after approval of an Integrated Resource Plan (“IRP”) or IRP Update. The QF Trade Associations note that PGE’s Schedule 201 rates have been too low for small QFs to enter into contracts for over a year and half, as the last small QF that entered into a Schedule 201 QF was in December 2020 and PGE has *zero* QFs in its current contracting queue.

The QF Trade Associations are concerned that PGE’s updates to forecasted gas and market pricing are too low given current market conditions. However, the QF Trade

Associations do not oppose incorporating these updates into PGE’s current pricing even though more accurate and current price estimates are likely warranted.

The QF Trade Associations oppose PGE’s out-of-cycle updates because PGE has not fully complied with the stipulation and thus its analysis is incomplete. At minimum, PGE needs to “review the historic percentage of QFs reaching completion and renewals for other utilities,” which it simply has not done, and assess its assumptions in light of this additional evidence.¹ Instead PGE continues to claim its limited history as justification for its assumptions, like 0% for existing QFs to renew, which are not just nor reasonable.

The QF Trade Associations’ specific recommendation is that the Commission act by clearly directing PGE on its obligations to fully complete the analysis required in last year’s stipulation after the rates are approved for this annual update. Absent Commission enforcement, the QF Trade Associations have no confidence that PGE will meet its obligations. For these reasons, the QF Trade Associations respectfully request that the Commission issue an order: 1) rejecting PGE’s proposed pricing and directing PGE to promptly refile its annual avoided cost update with only the authorized annual updates (i.e., just market prices and gas prices updated); and 2) direct PGE in clear and unmistakable language to comply with the obligations it agreed to in last year’s stipulation, including reviewing other utilities’ data and developing QF assumptions that are just and reasonable.

¹ Attachment A at PGE Response to REC Data Request 21; Staff Report, Attachment A at 1 (June 24, 2021).

II. COMMENTS

A. Legal Framework

The Oregon State Legislature has declared that

It is the goal of Oregon to ... [i]nsure that rates for purchases by an electric utility from, and rates for sales to, a qualifying facility [(“QF”)] shall over the term of a contract be just and reasonable to the electric consumers of the electric utility, the [QF] and in the public interest.²

The Commission has codified this goal in its regulations, which state that “[r]ates for purchases [from QFs] must [b]e just and reasonable to the public utility’s customers and in the public interest.”³ These statements mirror language in the federal Public Utility Regulatory Policies Act of 1978 (“PURPA”) and in the Federal Energy Regulatory Commission’s (“FERC’s”) regulations implementing PURPA.⁴ Not only that, but under PURPA, rates for purchase by electric utilities from QFs “shall not discriminate against [QFs].”⁵

The terms “just and reasonable” and “in the public interest” are similar, but not exactly the same as those terms are used in the retail ratemaking context. Both PURPA’s unique statutory framework and traditional retail ratemaking principles are relevant when the

² ORS 758.515(2).

³ OAR 860-029-0040(1).

⁴ 16 USC 824a-3(b) (“[I]n requiring any electric utility to offer to purchase electric energy from any [QF], the rates for such purchase shall be just and reasonable to the electric consumers of the electric utility and in the public interest”); 18 CFR 292.304(a)(1) (“Rates for purchases shall [b]e just and reasonable to the electric consumer of the electric utility and in the public interest”).

⁵ 16 USC 824a-3(b)(2).

Commission evaluates whether PGE has met its burden of proof to demonstrate that its proposed avoided cost rates are consistent with these legal standards.

First, the core legal analysis that is unique to PURPA is reviewing whether PGE’s proposed rates are equal to (full) avoided cost rates, considering PGE’s system and available data. The Commission has previously recognized the U.S. Supreme Court’s findings that:

[t]he statements in PURPA that rates for [QFs] must be “just and reasonable” and “in the public interest” have very definite meanings. “Just and reasonable” requires “consideration of potential rate savings for electric utility consumers.” “In the public interest” must be interpreted in a manner which increases “the utilization of cogeneration and small power production facilities and to reduce reliance on fossil fuels.” With this policy directive, the [U.S. Supreme Court] found reasonable FERC’s rules which provide “the maximum incentive for the development of cogeneration and small power production.”⁶

Both FERC and this Commission have recognized that rates for purchases from QFs satisfy “just and reasonable” and “in the public interest” standard when the rates “equal[] the [utility’s] avoided costs determined after consideration of [certain] factors.”⁷ Those factors include utility system data and the state regulator’s review of that data.⁸ This is true even though paying avoided cost rates equal to a utility’s avoided cost rates may “not directly provide any

⁶ *In Re Investigation of Avoided Costs and of Cost-effective Fuel Use and Resource Development*, Docket No. UM 21, Order No. 84-720 at 5 (Sept. 12, 1984) (internal citations omitted) (discussing a U.S. Supreme Court case involving PURPA, *American Paper Institute v. American Electric Power Service Corp*, 461 U.S. 402 (1983).

⁷ 18 CFR 292.304(b)(2); *see also* OAR 860-029-0040(2)(a) (using almost identical language).

⁸ 18 CFR 292.304(e)(2); OAR 860-029-0040(5)(a).

rate savings to electric utility consumers.”⁹ Thus, the question for the Commission to resolve in this proceeding is whether PGE’s proposed rates are equal to (full) avoided cost rates, considering PGE’s system and available data. In other words, the Commission must determine whether PGE’s proposed rates are equal to PGE’s avoided costs—that is, the “incremental costs of electric energy or capacity or both which, but for the purchase from the [QF] or [QFs], the electric utility would generate itself or purchase from another source, including any costs of interconnection of such resource to the system.”¹⁰ If PGE’s proposed rates are not equal to PGE’s avoided costs, then the proposed rates are not just and reasonable, and the Commission should not allow them to go into effect.

B. Annual Updates

PGE proposes to make two changes to the inputs to avoided cost pricing for factors that are listed as authorized updates for the annual avoided cost filing: 1) update natural gas prices using forecasts from March 31, 2022 or earlier; and 2) update on- and off-peak forward-looking electricity market prices using forecasts from March 31, 2022 or earlier. The ability for PGE to adjust these inputs and assumptions is generally consistent with the Commission’s requirements for annual updates, although the forecast is potentially subject to dispute.¹¹ Although PGE represents that it has updated gas and electricity market prices consistently with its same

⁹ *Am. Paper Inst.*, 461 U.S. at 415 (upholding FERC’s decision to require what it called “full” avoided cost rates rather than some lesser amount, despite the potential lack of savings for customers).

¹⁰ OAR 860-029-0010(1).

¹¹ *See* OAR 860-029-0085(4)(a)(A) & (B).

methodology in prior years,¹² the QF Trade Associations are concerned that this approach understates the significant upheaval of global markets and continuing uncertainty regarding gas and market pricing. Nonetheless, the QF Trade Associations do not oppose updating PGE’s current pricing with PGE’s proposal, rather than more accurate, data for gas and electricity market pricing.

C. Out-of-Cycle Updates

1. PGE’s Proposed Out-of-Cycle Updates

PGE proposes to make at least three out-of-cycle updates to avoided cost pricing: 1) update PGE’s resource portfolio, at least with regard to QF contract executions, terminations, and renewals (an item not immediately clear from PGE’s filing); 2) change one of PGE’s three planning assumptions about QF contracts; and 3) update PGE’s solar generation profile.¹³ In aggregate, these changes would increase the amount of unbuilt solar QF capacity that PGE is assuming will come online by approximately 90 MW,¹⁴ reduce the solar Effective Load Carrying Capability (“ELCC”) from the stipulated value of 8.5% to 6%,¹⁵ and, overall, generally result in

¹² PGE’s Supplemental Application to Update Schedule 201 Qualifying Facility Information at 1.

¹³ PGE’s Application to Update Schedule 201 Qualifying Facility Information at 1-4 (May 2, 2022). The application references updating QF “forecasts”, but it was through discovery that the extent of PGE’s changes to the QF portfolio as a whole became clear. It would be appreciated if PGE’s applications in future years could provide more specificity regarding the proposed changes.

¹⁴ See Attachment A at PGE Response to REC Data Request 5, 14, and 16. This number is the difference between PGE’s assumed 100% success for all Schedule 201 and 202 QFs in the current pricing (reduced by 85 MW per the stipulation) and PGE’s updated portfolio with an assumed 50% success rate for Schedule 201 QFs and 100% success rate for Schedule 202 QFs.

¹⁵ PGE’s Non-Confidential Supplemental Workpapers at Capacity Renewable.

lower pricing for solar QFs than pricing with only the updates to market and gas prices authorized by the Commission’s rules.¹⁶

PGE seeks a waiver of OAR 860-029-0085(4)(a) to make these changes. PGE asserts that good cause exists for a waiver because PGE views the changes as responsive “to stakeholder feedback from PGE’s 2021 avoided cost update and to Order No. 21-215.”¹⁷ The following sections summarize the 2021 avoided cost update and resulting stipulation. Had PGE complied with the 2021 stipulation, there may have been good cause for these changes. However, PGE has not fully complied, as explained below. The QF Trade Associations therefore oppose PGE’s proposed waiver and non-standard updates.

2. The 2021 Proceedings

In early 2021, PGE sought Commission acknowledgement of an update to its 2019 IRP for the sole purpose of “includ[ing] the updated inputs in the May 1 avoided cost update filing.”¹⁸ These proposed inputs included “[u]pdated capacity contribution values, notably capturing the impact of a material increase in solar resources in the resource portfolio.”¹⁹ This update resulted from PGE updating its solar portfolio to include: 1) approximately 93 MW of Community Solar resources; 2) approximately 162 MW of Green Energy Affinity Rider (“GEAR”) resources; and 3) QF contract data as of a June 15, 2020 snapshot date.²⁰ In

¹⁶ PGE’s Supplemental Application to Update Schedule 201 Qualifying Facility Information at 2.

¹⁷ PGE’s Application to Update Schedule 201 Qualifying Facility Information at 2 (May 2, 2022).

¹⁸ *In re PGE 2019 IRP*, Docket No. LC 73, PGE’s IRP Update at 2 (Jan. 29, 2021).

¹⁹ Docket No. LC 73, PGE’s IRP Update at 1.

²⁰ Docket No. LC 73, PGE’s IRP Update at 29-30.

summary, PGE proposed to include approximately 200 MW of additional solar resources in its Baseline Portfolio, with the effect of lowering the ELCC and capacity assumed for solar generation from approximately 15.8% to a mere 5.5%.²¹ PGE subsequently proposed to substantially reduce avoided cost pricing for solar QFs as a result.²²

The QF Trade Associations and other stakeholders opposed PGE’s proposed pricing. Among other issues, the QF Trade Associations flagged PGE’s unreasonable QF assumptions. At that time, PGE assumed that 100% of contracted-for QFs achieve commercial operations and no existing QFs renew their contracts. In 2021, the Renewable Energy Coalition and Northwest & Intermountain Power Producers Coalition proposed, as a stipulation in light of a lack of quality analysis by PGE, that PGE assume 50% of contracted-for QFs achieve commercial operations and 75% of existing QFs renew their contracts.²³ Commission Staff noted that

Until there is a more rigorous investigation through Dockets No. UM 2000 or UM 2038, Staff agrees with the QF parties that a 50-75% QF success rate is a more reasonable reflection of reality for the purposes of identifying the appropriate compensation of marginal capacity value of future solar QFs.²⁴

Commission Staff analyzed the issue and “found that that PGE’s addition of 200 MW of additional solar in its baseline should be adjusted down by roughly 83 MW. Staff imputed an ELCC value of 8.5 based on this adjustment.”²⁵ In a stipulation, PGE agreed to use an 8.5%

²¹ See Staff Report at 5 (June 24, 2021).

²² See generally PGE’s Application to Update Schedule 201 Qualifying Facility Information (May 3, 2021).

²³ Renewable Energy Coalition and Northwest & Intermountain Power Producers Coalition’s Comments on the 2021 Annual Update at 2.

²⁴ Staff Report at 6 (June 24, 2021).

²⁵ Staff Report at 5 (June 24, 2021).

ELCC, and some, but not all, of the QF Trade Associations agreed to support the number “conditioned on PGE’s agreement to perform a QF forecast sensitivity analyses in advance of the 2022 IRP.”²⁶

3. The 2021 Stipulation

The 2021 stipulation is publicly available at Attachment A to Staff’s 2021 Staff Report. Among other things, it requires PGE to develop better data on certain disputed issues, including to “develop QF online and renewal sensitivity analyses.”²⁷ The stipulation states:

For QFs with contracts that are executed but that are not yet operational at the time of the snapshot, PGE will examine factors including but not be limited to: the historic percentage of PGE’s QFs having reached commercial operations, the opportunities to sell power to other utilities, sophistication and experience of project developers, contractual provisions, technology, and interconnection risks. At least one analysis will start with PGE’s historic percentage of PGE’s QFs that have reached commercial operations. For QF renewals, PGE will examine factors including but not limited to: the historic percentage of PGE’s QFs that have renewed their contracts, the sophistication and experience of project developers, contractual provisions, technology, the opportunity to sell power to other utilities, and interconnection risks. At least one analysis will start with PGE’s historic percentage of PGE’s QFs that have renewed their contracts. PGE will also review the historic percentage of QFs reaching completion and renewals for other utilities.²⁸

Finally, the stipulation required PGE to provide information about ELCC values considering other proxy resource characteristics.²⁹

²⁶ Staff Report at 6 (June 24, 2021). CREA and OSSIA did not agree to support PGE’s 2021 rate update.
²⁷ Staff Report, Attachment A at 1 (June 24, 2021).
²⁸ Staff Report, Attachment A at 1 (June 24, 2021).
²⁹ Staff Report, Attachment A at 1 (June 24, 2021).

The stipulation was specific to PGE’s 2021 avoided cost filing and all parties to the stipulation reserved their rights to take different positions in subsequent proceedings, including subsequent avoided cost updates.³⁰

4. PGE’s Actions under the 2021 Stipulation

The 2021 stipulation specifically required PGE’s analyses to be “presented in an IRP roundtable as part of its next IRP, with meeting materials ... provided ... at least two weeks in advance.”³¹ At the time of stipulation, PGE was expected to file its 2022 IRP in March 2022, or approximately 9 months later.

Instead, several months after the stipulation, PGE sought a one-year extension.³² Notably, PGE did not seek an extension as allowed under the rules when a utility does not plan significant resource actions, but instead PGE sought a waiver of the filing deadline to allow additional analyses regarding PGE’s new statutory obligations under Oregon’s 100% Clean Energy law.³³ Renewable QFs could help PGE satisfy its obligations under this new law, so inaccurately low avoided cost pricing that deters QF development is contrary to the reasons for PGE’s extension. Further, the evidence demonstrates this concern is not hypothetical. At a time when PGE and other utilities are generally procuring additional capacity and facing increased

³⁰ Staff Report, Attachment A at 2 (June 24, 2021).

³¹ Order No. 21-215, Appendix A at 12 (July 6, 2021).

³² Docket No. LC 73, PGE’s Request for Extension of Time to File Next IRP (Oct. 15, 2021).

³³ See Docket No. LC 73, Staff Report at 2 (Nov. 8, 2021).

renewable energy mandates, PGE last contracted with a Schedule 201 QF in December 2020 and has *zero* QFs in its current contracting queue.³⁴

The Commission granted the extension but recognized that the extension did not affect PGE’s obligations under the avoided-cost stipulation.³⁵ When the Commission granted the IRP extension, it noted that “PGE must perform and share analyses ... no later than the original IRP deadline of March 16, 2022.”³⁶ PGE conducted some analyses, shared the materials in February 2022, and held a workshop in March 2022.³⁷

Notably absent from PGE’s workshop materials is any discussion of how PGE “review[ed] the historic percentage of QFs reaching completion and renewals for other utilities.”³⁸ In discovery, the QF Trade Associations asked PGE how it did this review, and PGE responded that:

PGE reached out to PacifiCorp and Idaho Power to inquire whether information regarding their historic QF success and renewal rates are publicly available. PGE has not identified a publicly available source of this information.³⁹

In other words, PGE has *not* reviewed any data from other utilities, despite agreeing to do so.

³⁴ Attachment A at PGE Responses to REC Data Requests 14 and 27 (“PGE does not have any QF’s [sic] that are being actively negotiated at this time.”).

³⁵ Docket No. LC 73, Order No. 21-422 at 1 (Nov. 18, 2021).

³⁶ Docket No. LC 73, Order No. 21-422 at 1 (Nov. 18, 2021).

³⁷ See PGE IRP Roundtable PowerPoint Covering Order 21-215.

³⁸ See PGE IRP Roundtable PowerPoint Covering Order 21-215.

³⁹ Attachment A at PGE Response to REC Data Request 21.

5. PGE Needs Additional Data to Inform Its Analysis

PGE’s failure to comply with the stipulation is particularly frustrating because the data is necessary to inform PGE’s QF assumptions. Without the data, PGE continues to rely upon its “limited historical experience” as support for two unreasonable assumptions. First, PGE continues to assume that 100% of contracted-for but not yet built Schedule 202 QFs with PPAs 10 MWs and above will come online, even though this is higher than its own historical data.⁴⁰ PGE claims this is reasonable in part based on PGE’s “limited history.”⁴¹ The QF Trade Associations continue to believe a 75% assumption is the highest reasonable assumption, and note that 75% actually reflects the *highest* possible interpretation of PGE’s own historical data.

The other assumption that PGE continues to base on inadequate and inaccurate data concerns the number of currently operational and selling QFs who will likely renew their contracts to sell. PGE makes no assumption (essentially a 0% assumption) “given its limited historical experience.”⁴² When asked to describe this experience, PGE referenced its QF data and stated:

PGE has three current Schedule 201 contracts that have renewed; however, those were all previously on short-term contracts (two years or less) when they renewed. PGE does not have any experience for a full-term-length Schedule 201 contract (e.g. a PPA with a 15-year term) having come up for renewal.⁴³

⁴⁰ PGE’s Application to Update Schedule 201 Qualifying Facility Information at 3.
⁴¹ PGE’s Application to Update Schedule 201 Qualifying Facility Information at 3.
⁴² PGE’s Application to Update Schedule 201 Qualifying Facility Information at 3.
⁴³ Attachment A at PGE Responses to REC Data Requests 16 and 18.

The QF Trade Associations acknowledge that PGE's experience is limited. However, they maintain that, despite the small amount of evidence, an assumption at or close to 100% is still far more realistic and reasonable than an assumption of 0%. In addition to the Schedule 201 contracts described above, PGE has one operating non-solar facility that is a QF, the Covanta Marion waste to energy facility that began operations in the 1980s and continues to sell to PGE.⁴⁴

The only QF assumption that PGE has based on actual data is its proposed 50% assumed success rate for Schedule 201 QFs, down from its previous assumption of 100% assumed success rate. The QF Trade Associations appreciate this incremental concession, as PGE previously refused to consider any assumption below 100%, despite having sufficient data to do so.⁴⁵ Still, PGE continues to assume that 100% of its Schedule 202 QFs will become commercially operational, and 0% of its existing QFs will renew their contracts. PGE needs to complete its analysis for all three assumptions before making any out-of-cycle updates to its pricing.

6. PGE Should Review Other Utilities' Data

Another frustrating aspect of PGE's actions in this case is that PGE never indicated to the QF Trade Associations that it was, apparently, struggling to find publicly available data to review. The QF Trade Associations could have readily directed PGE to available sources. For example, the QF Trade Associations have filed comments in Docket No. AR 631 (a docket in

⁴⁴ Attachment A at PGE Response to REC Information Request 14 at 2.

⁴⁵ See REC and NIPPC's Comments on the 2021 Annual Update at 16 and at Attachment A at 11-12 (PGE Response to REC Data Request 8).

which PGE is actively participating), and those comments included extensive data about QF renewals for both PacifiCorp and Idaho Power.⁴⁶

7. The Commission Should Order PGE to Complete its Analysis

Since PGE appears to not have seen any data for other utilities, it must not have “review[ed]” data as required by the stipulation. The QF Trade Associations urge the Commission to take action by clearly directing PGE on its obligations. Absent Commission enforcement, the QF Trade Associations have no confidence that PGE will meet its obligations. The QF Trade Associations recommend that the Commission order PGE to complete its analysis by next March 2023, subject to the same data sharing and workshop obligations as set in Attachment A of Staff’s 2021 report. The QF Trade Associations are disappointed that this analysis has been delayed but believe this approach is the most productive option available.

III. CONCLUSION

The QF Trade Associations appreciate the opportunity to comment and look forward to seeing PGE’s avoided cost pricing become more accurate, just, and reasonable by: 1) updating the current pricing with gas and market prices at least as current as those PGE proposes; 2) rejecting PGE’s out-of-cycle updates; and 3) ordering PGE to complete the stipulated analysis for future benefits.

⁴⁶ Docket No. AR 631, Joint Reply Comments of the QF Trade Associations on Staff’s Proposed Group 1 Rules at Attachment A (PacifiCorp Data Response to Renewable Energy Coalition Data Request 5 in OPUC Docket No. LC 77 (PacifiCorp’s 2021 IRP)) and Attachment B (Idaho Power Data Response to Renewable Energy Coalition Data Request No. 1.1 in OPUC Docket No. LC 74 (Idaho Power’s 2019 IRP)) (Mar. 25, 2022).

Dated this 28th day of June 2022.

Respectfully submitted,

Sanger Law, PC



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Attachment A

**Portland General Electric Responses to
Renewable Energy Coalition Information Requests**

REDACTED

May 21, 2021

TO: Irion Sanger
Renewable Energy Coalition

FROM: Robert Macfarlane
Manager, Pricing and Tariffs

**PORTLAND GENERAL ELECTRIC
UM 1728
PGE Response to REC Data Request No. 005
Dated May 7, 2021**

Request:

Please reference PGE's Application at 4, which states that "PGE includes all executed PURPA QF contracts in the Baseline Portfolio." Please identify all PURPA QF contracts that PGE has executed from January 1, 2015 to the present date. For each executed PURPA QF contract, please state: 1) the date of execution; 2) the QF size in MW; 3) the type of resource; 4) whether the contract was for a new resource or an existing resource; 5) the scheduled commercial operation date ("COD") in the unamended contract; 6) whether the scheduled COD was amended and, if so, the scheduled COD as amended; 7) whether the QF has achieved commercial operations and, if so, the date; 8) whether the contract was terminated and, if so, the date; 9) whether the QF contract is currently in PGE's Baseline Portfolio; 10) when PGE assumes the QF will achieve commercial operations, if applicable; and 11) whether the contract has been terminated by PGE or the QF. Please provide the information in Excel format with working files.

Response:

PGE objects to this request to the extent that it is overly broad, unduly burdensome, and requests information not relevant to this proceeding. Subject to and without waiving these objections, PGE responds as follows:

Please see Attachments 005-A and 005-B. Attachment 005-B is protected information subject to Order No. 17-321.

Regarding parts 9 and 10 of this request: Column K identifies whether or not a QF contract was included in the 2019 IRP Update Baseline Portfolio (part 9). For part 10, column L provides the assumed start date for the 2019 IRP Update. PGE assumes the QF will achieve COD on the date that the QF selects. For the 2019 IRP Update, if the QF had missed its COD by the snapshot date, PGE made a simplifying assumption that the QF would achieve commercial operations by July 1, 2020. As discussed in PGE's Reply Comments, this was a reasonable modeling simplification as any assumption of a date prior to 2025 would not impact ELCC calculations. See also PGE's response to UM 1728 REC Data Request No. 10, part c.

Existing and Proposed PURPA Qualified Facilities (QFs)
 by Shawn Davis / Bruce True
 03/22/2016

Project Name	Status	PPA Execut on Date	Resource Type	Nameplate Capacity	Actual COD	Contracted COD	Type of PPA	PPA Expiration Date	Renewal
SP Solar 8	Active	7/28/2015	Solar	2.2	2/8/2018	12/31/2017	Standard	7/28/2035	
SSD Clackamas 1	Active	5/8/2018	Solar	4	12/21/2020	10/5/2021	Standard	10/4/2036	
SSD Clackamas 2	Terminated	10/20/2017	Solar	2		4/1/2020	Standard	Terminated	
SSD Clackamas 4	Active	10/20/2017	Solar	2	12/28/2020	4/1/2020	Standard	3/31/2035	
SSD Clackamas 7	Active	5/8/2018	Solar	2	12/28/2020	4/1/2020	Standard	3/31/2035	
SSD Marion 1	Active	5/25/2018	Solar	2	12/8/2020	4/1/2020	Standard	3/31/2035	
SSD Marion 3	Active	10/20/2017	Solar	2	2/17/2020	4/1/2020	Standard	3/31/2035	
SSD Marion 5	Active	5/8/2018	Solar	2	4/1/2020	4/1/2020	Standard	3/31/2035	
SSD Marion 6	Active	5/8/2018	Solar	2	12/21/2020	4/1/2020	Standard	3/31/2035	
St Louis Solar	Active	6/10/2016	Solar	2.2	4/6/2020	2/10/2019	Standard	6/9/20 6	
St. Helen's Organic Recycling	Terminated	11/10/2015	Biogas	2.4		10/1/20 8	Standard	Terminated	
Stark Solar (Solar Star Oregon)	Terminated	6/2/2017	Solar	10		12/31/2019	Standard	Terminated	
Starlight Solar	Terminated	5/20/2016	Solar	4		12/31/2019	Standard	Terminated	
Starvation Solar	Active	1/25/2016	Solar	10	12/27/2019	1/25/2019	Standard	1/25/2035	
Stlorgan Solar	Active	7/17/2020	Solar	1.53		11/2/2022	Standard	11/1/2042	
Stringtown Solar	Terminated	5/20/2016	Solar	4		12/31/2019	Standard	Terminated	
Sulusolar6	Terminated	4/19/2018	Solar	3		12/2/2019	Standard	Terminated	
Sulusolar9	Terminated	8/31/2018	Solar	2.97		7/2/2021	Standard	Terminated	
Suntex Solar	Active	5/16/2016	Solar	10	7/8/2020	7/20/2019	Standard	6/1/2035	
Thomas Creek Solar	Active	5/31/2017	Solar	2.2	11/8/2019	2/1/2019	Standard	5/31/2037	
Tickle Creek Solar	Active	8/23/2017	Solar	1.85	12/27/2019	1/31/2019	Standard	8/22/2037	
Townsend Solar	Terminated	6/4/2018	Solar	2.25		9/30/2019	Standard	Terminated	
Tygh Valley Solar	Terminated	1/25/2016	Solar	10		1/25/2019	Standard	Terminated	
Volcano Solar	Active	10/18/2017	Solar	0.75	7/17/2019	3/1/20 8	Standard	10/18/2037	
Wacosta Solar	Active	6/4/2018	Solar	2.25		7/1/2020	Standard	4/1/2038	
Walker Creek Solar	Terminated	6/4/2018	Solar	2.5		12/1/2019	Standard	Terminated	



June 3, 2022

To: Joni Sliger
Renewable Energy Coalition

From: Robert Macfarlane
Manager, Pricing and Tariffs

Portland General Electric Company
UM 1728
PGE Response to REC Information Request 014
Dated May 20, 2022

Request:

Please reference PGE's 2022 application at page 3, which states that "PGE updated its portfolio based on the assumption that 100% of the QFs under Schedule 202 that have executed contracts but have not yet achieved commercial operation will come online" and that "PGE has executed just eight (8) Schedule 202 contracts, of which one is operational, four are currently under contract but have not yet achieved commercial operation, two were converted to a bilateral contract, and one was terminated by the Seller. Given the limited history for QFs of this size, the sophistication of the developers of these projects, and the significant size of these projects (in aggregate all eight projects are 419MWs), it is reasonable for PGE to assume that the four Schedule 202 QFs currently under contract will achieve commercial operation."

- a. Please identify all of PGE's executed Schedule 202 contracts.
- b. Please identify whether the 8 contracts include Covanta Marion, Inc. ("Covanta Marion").
 - i. If not, please explain whether Covanta Marion has entered into any Power Purchase Agreements ("PPA") to sell its net output under the Public Utility Regulatory Policies Act ("PURPA").
 - ii. Please confirm that PGE entered into a PPA with Covanta Marion on March 31, 2014. 1. Please confirm that PGE filed this PPA with the Oregon Public Utility Commission as a PURPA PPA.
 - iii. Please confirm that PGE entered into a Power Purchase and Sale Agreement (PPA) with Covanta Marion for Qualifying Facility (QF) Greater than 10MW on June 19, 2018.
 1. Please confirm that PGE filed this PPA with the OPUC as a PURPA PPA.
 2. Please confirm that PGE filled this PPA as a "PGE Tariff Schedule 202 for Qualifying Facilities Greater than 10 MW."
 3. Please confirm that the contract expiration date is September 30, 2034.
 - iv. Please confirm that Covanta Marion is selling power to PGE. If not, please explain why.
- c. Did PGE consider any other utilities' experience with QFs of this size?

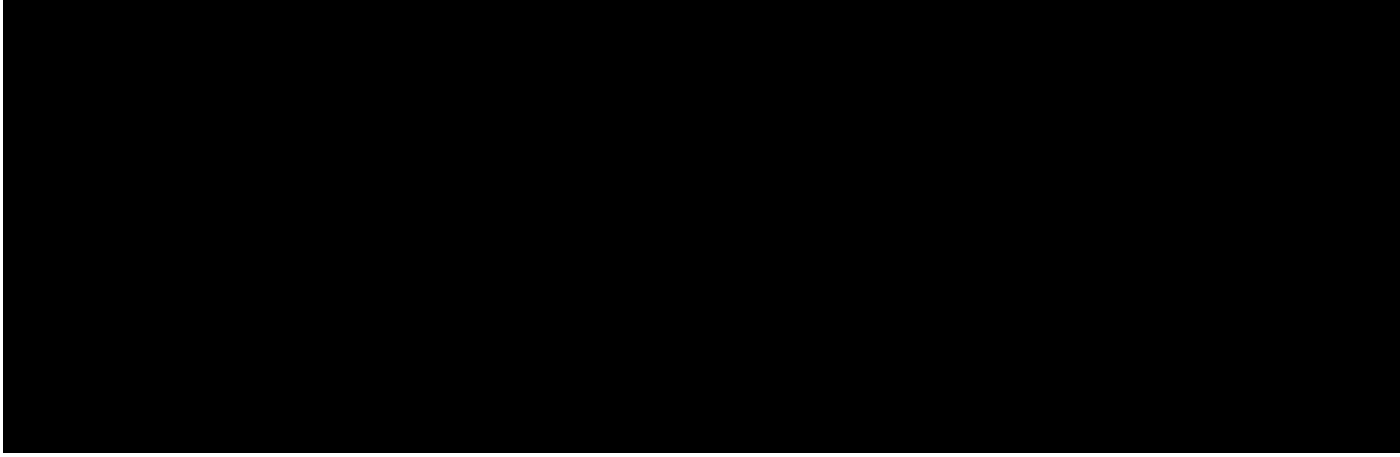
- i. If so, please identify the utility(ies) and describe each other utility's experience.
 - ii. If not, explain why not.
- d. For each of PGE's executed Schedule 202 contracts (including the Covanta Marion PPA), please identify:
- i. The date of contract execution;
 - ii. The type of contract (on-system, renewable, firm, etc.)
 - iii. The capacity in megawatts ("MWs");
 - iv. The resource type (wind, solar, baseload, etc.);
 - v. The original scheduled commercial operation date;
 - vi. The current scheduled commercial operation date;
 - vii. The date on which commercial operations was achieved, if applicable;
 - viii. The date of contract termination, if applicable;
 - ix. Whether the project converted to a bilateral contract;
 - x. The current status of the project; and
 - xi. The most recent date prior to PGE's 2022 application on which PGE received information about the project status.
- e. Please explain the circumstances of the termination for the one contract, to the extent known.
- f. Are the two facilities that contracted and later converted to bilateral contracts operational?
- g. Please explain why PGE believes a 100% assumption is appropriate when its experience indicates a success rate of 75% or less.
- h. Please reference PGE's March 2022 IRP Roundtable presentation at slide 15, which identifies 2 terminated negotiated QF contracts. Are the two terminated QF contracts referenced in the presentation Schedule 202 QFs? Please explain.

Response:

- a. Please refer to response provided in subpart (d).
- b. Yes, Covanta Marion is included in the eight (8) referenced agreements.
 - i. N/A
 - ii. PGE objects that this request seeks information that is not relevant, as the referenced PPA has expired. Notwithstanding and without waiving this objection: PGE confirms that from 2014 through 2017, Covanta Marion sold to PGE pursuant to a merchant contract based on the Edison Electric Institute Master Power Purchase and Sale Agreement. This contract was not a PURPA PPA, and it was erroneously filed in Docket RE 143.
 - iii. Confirmed.
 1. Confirmed

2. Confirmed
 3. PGE confirms that the expiration date of the referenced contract was September 30, 2034. However, that PPA has since been terminated.
- iv. PGE confirms that Covanta Marion is currently selling power to PGE pursuant to a bilateral PPA.
- c. No. PGE reached out to PacifiCorp and Idaho Power to inquire whether information regarding their historic QF success and renewal rates are publicly available. PGE has not identified a publicly available source of this information.
 - d. Please see attachment UM 1728_REC DR 014_Attach A_CONF. PGE does not track the dates on which it receives information about QF status, but the information reflected in the attachment is the most recent information PGE has available.
 - e. Please refer to response provided in (d).
 - f. Please refer to response provided in (d).
 - g. PGE has executed a total of eight (8) Schedule 202 contracts since the start of its QF program, four (4) of which have not passed their scheduled commercial operation date, and therefore are not relevant to any analysis of Schedule 202 QF success rate. Of the remaining four (4) Schedule 202 contracts, two (2) converted to bilateral under negotiation, one (1) was terminated by Seller, and (1) is online. Given the very limited experience in these size projects under a Schedule 202 contract, PGE does not believe that it has enough historical experience to base a forecast on anything less than 100%. Also, given the size of the QFs, it is reasonable to assume that the developer has a construction plan to achieve commercial operation.
 - h. Yes, the two “Terminated” “Negotiated” QFs referenced in the table on slide 15 are Schedule 202 QFs whose status at the time of termination was ‘Contracted’. Refer to the response provided in (d). The Schedule 202 contract that is terminated, and whose status at the time of termination was ‘Online’, is not represented in this slide, which addresses “QF Contracts Executed, Not Online.”

Attachment 014 A contains protected information and is subject to General Protective Order 17-321



June 3, 2022

To: Joni Sliger
Renewable Energy Coalition

From: Robert Macfarlane
Manager, Pricing and Tariffs

Portland General Electric Company
UM 1728
PGE Response to REC Information Request 016
Dated May 20, 2022

Request:

Please reference PGE's 2022 application at page 3, which states that "The 50% assumed success rate for Schedule 201 projects is based on actual experience for all of PGE's executed Schedule 201 QF contracts to date."

- a. Please identify all of PGE's executed Schedule 201 QF contracts.
- b. For each of PGE's executed Schedule 201 QF contracts, please identify:
 - i. The date of contract execution;
 - ii. The type of contract (on-system, renewable, firm, etc.);
 - iii. Whether the contract is a renewal contract;
 - iv. The capacity in megawatts ("MWs");
 - v. The resource type (wind, solar, baseload, etc.);
 - vi. The original scheduled commercial operation date;
 - vii. The current scheduled commercial operation date, if applicable;
 - viii. Whether the project is in default;
 - ix. The date on which commercial operations was achieved, if applicable;
 - x. The date on which PGE assumes the project will come online;
 - xi. The date of contract termination, if applicable;
 - xii. The date on which the facility shut down, if applicable;
 - xiii. Whether the project changed to a different type of contract (e.g., bilateral, community solar, etc.);
 - xiv. The current status of the project; and
 - xv. The most recent date prior to PGE's 2022 application on which PGE received information about the project status.

Response:

- a. Please see Attachment 016-A.
- b. Please see Attachment 016-A.

With respect to part (viii), notices of default are not relevant to whether a project will be terminated as the project has a right to cure the default. This does not indicate how the project should be treated for long term planning until termination notice has been provided.

With respect to part (xii), PGE objects to this request to the extent that it is overly broad, unduly burdensome, and requests information not relevant to this proceeding. PGE does not track this information, and it would be very difficult for PGE to obtain information regarding the specific date on which a facility shut down.

With respect to part (xv), PGE does not track the dates on which it receives information about QF status, but the information reflected in the attachment is the most recent information PGE has available.

Existing and Proposed PURPA Qualified Facilities (QFs)
by Shawn Davis / Bruce True
03/22/2016

Status	Status at Time of Termination	QF Name	Technology Type	MW Capacity	Scheduled Commercial Operational Date	PPA End Date	Date: PPA Executed	Actual COD	Actual COD Before or After Schedule COD	Point of Interconnect (POI)	Contract Type	Renewal	Date of Termination
Terminated	Contracted - CSP	Marquam Creek Solar (2)	Solar	2.00	12/1/2020	11/1/2040	4/3505						
Online		Millford Solar	Solar	2.97	12/2/2019	12/1/2034	4/19/2018	1/6/2021	After	PGE	Standard		8/24/2020
Online		Minke Solar	Solar	2.20	5/1/2020	8/13/2037	9/17/2019	12/14/2020	After	PGE	Standard		
Terminated	Contracted	Morrow Solar	Solar	10.00	9/30/2018	9/30/2033	1/25/2016			BPA	Standard		10/30/2018
Terminated	Contracted	Mountain Meadow Solar	Solar	2.50	12/1/2019	3/1/2038	5/25/2018			PGE	Standard		12/31/2020
Terminated	Contracted - CSP	Nr Hope Solar	Solar	2.50	12/1/2019	3/1/2038	5/25/2018			PGE	Standard		6/22/2020
Online		NorWest Energy 14 (Grande Rhonde)	Solar	2.20	12/31/2017	12/31/2031	7/28/2015	2/8/2018	After	PGE	Standard		
Terminated	Contracted	NorWest Energy 16	Solar	2.20	12/31/2016	12/31/2031	7/28/2015			PGE	Standard		4/25/2016
Terminated	Contracted	OE Solar 1	Solar	10.00	10/5/2018	10/5/2033	1/25/2016			BPA	Standard		10/30/2018
Terminated	Contracted	OE Solar 2	Solar	5.00	12/31/2017	1/25/2031	1/25/2016		N/A	BPA	Standard		1/26/2018
Online		OE Solar 3 (Wy'East)	Solar	10.00	12/30/2018	12/30/2033	1/25/2016	9/7/2018	Before	BPA	Standard		
Terminated	Contracted	OE Solar 4	Solar	10.00	6/30/2018	6/30/2033	3/7/2016			BPA	Standard		6/27/2018
Terminated	Contracted	OE Solar 5	Solar	10.00	6/30/2019	7/26/2031	11/4/2016			BPA	Standard		6/19/2019
Terminated	Contracted	OE Solar 6	Solar	10.00	6/30/2019	7/26/2031	6/15/2017			BPA	Standard		6/19/2019
Online		O'neil Creek Solar	Solar	2.20	3/24/2019	6/10/2036	6/10/2016	12/9/2019	After	PGE	Standard		
Online		Palmer Solar	Solar	2.20	7/1/2019	6/21/2036	6/21/2016	11/4/2020	After	PGE	Standard		
Terminated	Contracted	Parrott Creek Solar	Solar	2.00	12/1/2019	11/1/2039	6/28/2018			PGE	Standard		1/28/2021
Online		PG - West Sheridan	Solar	3.00	12/2/2019	12/1/2034	4/18/2018	12/31/2020	After	PGE	Standard		
Online		Pika Solar	Solar	2.20	5/1/2020	8/6/2037	9/17/2019	11/20/2020	After	PGE	Standard		
Terminated	Contracted	Radio Solar	Solar	2.50	12/31/2020	12/31/2040	11/29/2018			PGE	Standard		12/31/2021
Online		Rafael Solar	Solar	2.20	6/30/2019	6/21/2036	6/21/2016	10/29/2019	After	PGE	Standard		
Terminated	Contracted	Raven Loop	Solar	2.00	12/1/2019	3/1/2038	5/25/2018			PGE	Standard		12/31/2020
Terminated	Contracted	Reed Solar	Solar	2.20	12/1/2020	11/30/2040	5/21/2019			PGE	Standard		12/1/2021
Terminated	Contracted	Ridgeway Solar	Solar	2.50	12/1/2019	11/1/2039	6/4/2018			PGE	Standard		1/28/2021
Online		Riley Solar	Solar	10.00	6/27/2019	6/27/2035	6/27/2016	7/20/2020	After	BPA	Standard		
Terminated	Contracted - CSP	River Valley Solar	Solar	2.00	12/1/2019	3/1/2038	5/25/2018			PGE	Standard		8/24/2020
Terminated	Contracted	Rock Creek Solar	Solar	2.20	12/31/2020	2/6/2033	2/7/2018			PGE	Standard		12/31/2021
Online		Rock Garden	Solar	10.00	7/31/2019	7/31/2032	8/26/2016	6/24/2020	After	BPA	Standard		
Terminated	Contracted - CSP	Sandy River Solar	Solar	1.85	12/1/2019	3/1/2038	5/25/2018			PGE	Standard		6/1/2020
Online		SB - South Wilamina (Sulus28)	Solar	2.97	12/2/2019	12/1/2034	4/19/2018	10/22/2020	After	PGE	Standard		
Terminated	Contracted - CSP	Sesqui-C Solar	Solar	2.50	12/31/2020	12/31/2040	11/29/2018			PGE	Standard		6/8/2020
Online		Sheep Solar	Solar	2.20	12/31/2017	1/25/2036	1/25/2016	2/8/2018	After	PGE	Standard		
Online		Silvertown Solar	Solar	2.20	12/31/2017	1/26/2036	1/25/2016	2/8/2018	After	PGE	Standard		
Terminated	Contracted	South Burns Solar I	Solar	10.00	7/20/2019	7/20/2035	7/20/2016			BPA	Standard		2/9/2021
Online		SP Solar 1 (Interstate)	Solar	2.20	12/31/2017	7/28/2035	7/28/2015	2/8/2018	After	PGE	Standard		
Terminated	Contracted	SP Solar 2 (Goose Creek)	Solar	2.20	12/31/2017	7/28/2035	7/28/2015			PGE	Standard		1/2/2020
Terminated	Contracted	SP Solar 4	Solar	2.20	12/31/2016		7/28/2015			PGE	Standard		4/25/2016
Online		SP Solar 5 (Mill Creek)	Solar	2.20	12/31/2017	7/28/2035	7/28/2015	2/8/2018	After	PGE	Standard		
Online		SP Solar 6 (Colton)	Solar	2.20	12/31/2017	7/28/2035	7/28/2015	8/21/2018	After	PGE	Standard		
Online		SP Solar 7 (Dayton Cutoff)	Solar	2.20	12/31/2017	7/28/2035	7/28/2015	6/30/2018	After	PGE	Standard		
Online		SP Solar 8 (Valley Creek)	Solar	2.20	12/31/2017	7/28/2035	7/28/2015	2/8/2018	After	PGE	Standard		
Online		SSD Clackamas 1	Solar	4.00	10/5/2021	10/4/2036	5/8/2018	12/30/2020	Before	PGE	Standard		
Terminated	Contracted	SSD Clackamas 2	Solar	2.00	4/1/2020	3/1/2035	10/20/2017	N/A		PGE	Standard		5/8/2018
Online		SSD Clackamas 4	Solar	2.00	4/1/2020	3/31/2035	10/20/2017	12/28/2020	After	PGE	Standard		
Online		SSD Clackamas 7	Solar	2.00	4/1/2020	3/31/2035	5/8/2018	12/28/2020	After	PGE	Standard		
Online		SSD Marion 1	Solar	2.00	4/1/2020	3/31/2035	5/25/2018	12/8/2020	After	PGE	Standard		
Online		SSD Marion 3	Solar	2.00	4/1/2020	3/31/2035	10/20/2017	12/31/2020	After	PGE	Standard		
Online		SSD Marion 5	Solar	2.00	4/1/2020	3/31/2035	5/8/2018	12/30/2020	After	PGE	Standard		
Online		SSD Marion 6	Solar	2.00	4/1/2020	3/31/2035	5/8/2018	12/30/2020	After	PGE	Standard		
Online		St Louis Solar	Solar	2.20	2/10/2019	6/9/2036	6/10/2016	4/6/2020	After	PGE	Standard		
Online		Starbuck Properties	Solar	0.03	1/17/2011	11/2/2030	11/2/2010	1/1/2011	Before	PGE	Standard		
Terminated	Contracted	Stark Solar (Solar Star Oregon)	Solar	10.00	12/31/2019	12/30/2034	6/2/2017			BPA	Standard		1/6/2021
Terminated	Contracted	Starlight Solar	Solar	4.00	12/31/2019	5/20/2036	5/20/2016			PGE	Standard		2/9/2021
Online		Starvation Solar	Solar	10.00	1/25/2019	1/25/2035	1/25/2016	12/27/2019	After	BPA	Standard		
Online		Steel Bridge Solar	Solar	2.50	8/19/2015	2/19/2034	2/19/2014	2/18/2016	After	PGE	Standard		
Contracted		Stilorign Solar	Solar	1.53	11/2/2022	11/1/2042	1/17/2020			PGE	Standard		
Terminated	Contracted	Stringtown Solar	Solar	4.00	12/31/2019	5/20/2036	5/20/2016			PGE	Standard		2/9/2021
Terminated	Contracted	SulusSolar6	Solar	3.00	12/2/2019	12/1/2034	4/19/2018			PGE	Standard		12/9/2019
Terminated	Contracted	SulusSolar9	Solar	2.97	7/2/2021	7/1/2041	8/31/2018			PGE	Standard		5/22/2019
Online		Suntech Solar	Solar	10.00	7/20/2019	6/1/2035	5/16/2016	7/8/2020	After	BPA	Standard		
Online		Thomas Creek Solar	Solar	2.20	2/1/2019	5/31/2037	5/31/2017	11/8/2019	After	PGE	Standard		
Online		Tickle Creek Solar	Solar	1.85	1/31/2019	8/22/2037	8/23/2017	12/27/2019	After	PGE	Standard		
Terminated	Contracted	Townsend Solar	Solar	2.25	9/30/2019	9/30/2039	6/4/2018			PGE	Standard		1/28/2021
Terminated	Contracted	Tygh Valley Solar	Solar	10.00	1/25/2019	1/25/2035	1/25/2016			BPA	Standard		1/29/2020
Online		Volcano Solar	Solar	0.75	11/30/2017	10/15/2037	10/16/2017	7/17/2019	After	PGE	Standard		
Contracted		Waconda Solar	Solar	2.25	2/1/2020	4/1/2038	6/4/2018			PGE	Standard		
Terminated	Contracted	Walker Creek Solar	Solar	2.50	12/1/2019	11/1/2039	6/4/2018			PGE	Standard		10/3/2018
Terminated	Contracted	Walker Creek Solar (2)	Solar	2.50	12/1/2020	11/1/2040	2/9/2019			PGE	Standard		12/1/2021
Terminated	Contracted	Wasco Solar 1	Solar	10.00	1/25/2019	1/25/2035	1/25/2016			BPA	Standard		1/29/2020
Terminated	Contracted - CSP	Waterford Solar (2)	Solar	2.57	5/2/2022	5/1/2042	8/27/2019			PGE	Standard		8/24/2020
Online		West Hines Solar I	Solar	10.00	7/20/2019	7/20/2035	7/20/2016	6/16/2020	After	BPA	Standard		
Terminated	Contracted	Willamina Mill Solar	Solar	2.20	8/14/2019	6/21/2036	6/21/2016			PGE	Standard		1/28/2021
Terminated	Contracted	Willamina Solar	Solar	0.50	12/31/2016	11/13/2035	11/13/2015			PGE	Standard		1/26/2018
Terminated	Contracted - CSP	Williams Acres Solar	Solar	2.50	12/1/2019	12/1/2039	6/4/2018			PGE	Standard		6/22/2020
Terminated	Contracted	Yamhill Creek Solar	Solar	2.20	4/30/2018	5/31/2037	5/31/2017			PGE	Standard		12/26/2019
Terminated	Contracted - CSP	Zena Solar	Solar	2.50	12/1/2019	12/1/2039	6/4/2018			PGE	Standard		8/12/2020

June 3, 2022

To: Joni Sliger
Renewable Energy Coalition

From: Robert Macfarlane
Manager, Pricing and Tariffs

Portland General Electric Company
UM 1728
PGE Response to REC Information Request 018
Dated May 20, 2022

Request:

Please reference PGE's 2022 application at page 3, which states that "PGE did not include any assumed renewal rate at this time given its limited historical experience, because PGE does not expect a meaningful amount of renewals to occur prior to 2030 (just 6MW currently under contract with PGE are up for renewal between now and 2030)."

- a. Please describe PGE's "limited historical experience."
- b. Please identify every generator currently selling to PGE which holds or previously held a Schedule 201 or Schedule 202 contract with PGE.
- c. Please identify every generator that achieved commercial operations but is no longer selling to PGE. Please state whether each generator has shut down or is still operational.

Response:

- a. Please see response to DR 016. PGE has three current Schedule 201 contracts that have renewed; however, those were all previously on short-term contracts (two years or less) when they renewed. PGE does not have any experience for a full-term-length Schedule 201 contract (e.g. a PPA with a 15-year term) having come up for renewal.
- b. PGE's responses to DR 016 and DR 014 provide all generators currently selling under Schedule 201 and Schedule 202, which includes contracts that were terminated and moved to the Community Solar Program. In addition, the two Schedule 202 contracts that have converted to bilateral agreements are included in the response. To the best of PGE's knowledge, no other generators currently selling to PGE previously held a Schedule 201 or Schedule 202 contract with PGE.
- c. PGE objects to this request to the extent that it is overly broad, unduly burdensome, and PGE does not have access to this information. This request does not appear to be limited to QF contracts, and it has no time limitations. In addition, PGE does not have information regarding whether specific generators no longer selling to PGE have shut down or are still operating. Please see PGE's responses to DR 014 and DR 016 for information about PGE's Schedule 201 and Schedule 202 contracts.

June 3, 2022

To: Joni Sliger
Renewable Energy Coalition

From: Robert Macfarlane
Manager, Pricing and Tariffs

Portland General Electric Company
UM 1728
PGE Response to REC Information Request 021
Dated May 20, 2022

Request:

Please reference Oregon Public Utility Commission (“OPUC”) Order No. 21-215 at Attachment A, which states “PGE will also review the historic percentage of QFs reaching completion and renewals for other utilities.”

- a. Please provide a written explanation for how PGE “review[ed] the historic percentage of QFs reaching completion and renewals for other utilities.”
- b. Please provide copies of all data and workpapers regarding “the historic percentage of QFs reaching completion and renewals for other utilities.”

Response:

PGE reached out to PacifiCorp and Idaho Power to inquire whether information regarding their historic QF success and renewal rates are publicly available. PGE has not identified a publicly available source of this information.

June 10, 2022

To: Joni Sliger
Renewable Energy Coalition

From: Robert Macfarlane
Manager, Pricing and Tariffs

Portland General Electric Company
UM 1728
PGE Response to REC Information Request 027
Dated May 27, 2022

Request:

Please reference PGE Response to REC Data Request No. 009. Please provide an updated response.

For reference – Data Request No. 009:

Please reference PGE’s application at 4, which states that “PGE currently has 602 MW of solar projects in its QF queue that are actively being negotiated.”

a. Please for each QF (including non-solar projects) identify: 1) its size; 2) its resource type; 3) whether the project is on or off system; 4) whether it has requested indicative prices from PGE; 5) whether it has requested a QF contract from PGE; 6) whether PGE has provided a draft contract; 7) whether the QF has provided edits or revisions on the contract; 8) whether the QF has requested an executable contract; and 9) whether it has received an executed contract from PGE. Please provide the information in Excel format with working files.

b. Are any of the QF projects in PGE’s QF queue existing QFs that have achieved commercial operations and are seeking a contract renewal? If so, has PGE included the QF project’s operations after the current contract expiration date in any forecast for PGE’s Annual Power Cost Update Tariff proceeding? If so, please identify the date(s) on which PGE forecasted the project(s) would come online for purposes of its Annual Power Cost Update Tariff proceeding. Please provide the information in Excel format with working files.

Response:

PGE objects to this request because it seeks information that is not relevant to this proceeding. PGE’s application did not discuss QFs being negotiated. Without waiving this objection, PGE provides the following response.

PGE does not have any QF’s that are being actively negotiated at this time.