

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1934

In the Matter of

PORTLAND GENERAL ELECTRIC,

2018 Request for Proposals for Renewable
Resources.

RENEWABLE NORTHWEST
COMMENTS ON
FINAL SHORT LIST

I. INTRODUCTION

Renewable Northwest thanks the Oregon Public Utility Commission (“Commission”) for this opportunity to comment on Portland General Electric’s (“PGE”) Request for Acknowledgement of the Final Short List of Bidders (“Final Short List”) in PGE’s 2018 Request for Proposals for Renewable Resources (“RFP”).¹ Earlier in the RFP process, Renewable Northwest filed comments supporting PGE’s decision to pursue renewable energy resources as a lowest cost, lowest risk path to meeting its energy and capacity needs, as identified by its 2016 Integrated Resource Plan (“IRP”).² During the RFP design phase, we worked alongside the Independent Evaluator (“IE”), Commission Staff, PGE, and other stakeholders to try to ensure that the procurement process would instill market confidence and provide for robust competition, leading to a short list with a diversity of technologies and transaction types.

The IE’s Final Report found that “[t]he selected bids are the best qualified offers from a reasonably competitive process” and that the IE’s “independent analysis confirmed that the selected bids were reasonably priced.”³ PGE’s Final Short List also reflects a broad trend of rapidly declining renewable energy costs that could provide significant system benefits inuring to all customers. Indeed, the Final Short List presents a unique opportunity for PGE to procure a significant amount of new renewable energy resources at a time when its customers can derive the most benefit from declining federal tax credits. As a result, Renewable Northwest supports PGE’s request for acknowledgment of the Final Short List.

¹ Available at <https://edocs.puc.state.or.us/efdocs/HAH/um1934hah171931.pdf>.

² UM 1934, Comments of Renewable Northwest (Apr. 30, 2018), available at <https://edocs.puc.state.or.us/efdocs/HAC/um1934hac17640.pdf>.

³ UM 1934, The Independent Evaluator’s Final Report on Portland General Electric’s 2018 Renewable Request for Proposals, p2 (Oct. 2, 2018).

II. THINK GLOBALLY

PGE’s submission of the Final Short List coincided with the release by the Intergovernmental Panel on Climate Change (“IPCC”) of a special report on limiting warming to 1.5°C in order to mitigate the impacts of global warming.⁴ The IPCC assessment found that “limiting global warming to 1.5°C ... would require rapid and far-reaching transitions in energy,”⁵ including “clear emissions reductions by 2030.”⁶ While direct consideration of environmental risks is not currently part of the Commission’s current decision-making approach, the IPCC report explains that rapid changes to the world’s generating fleets are necessary to avoid the worst effects of climate change, providing important international context for the Commission’s decision.

III. ACT LOCALLY

As part of an announcement that Governor Brown was to travel to Bonn for the United Nations Climate Conference in November 2017, she said:

... I see it as not only our moral obligation, but an economic imperative to lead in the fight against climate change ... While Oregon is a small part of the global climate challenge, we are playing a leading role in finding innovative solutions to preserve our natural resources, reduce carbon, and prepare Oregon for the clean energy economy of the future.⁷

PGE’s Final Shortlist points the way toward this clean energy future.

In an attempt to address Oregon’s part in the global climate challenge, PGE released its report “Exploring Pathways to Deep Decarbonization for the Portland General Electric Service Territory” on April 24, 2018.⁸ PGE’s report was motivated by an overarching target of reducing energy-related CO₂ emissions 80 percent reduction below 1990 levels by 2050.⁹ The report found that in order to achieve that target, “[i]n all pathways, generation from non-emitting

⁴ Intergovernmental Panel on Climate Change, Special Report on Global Warming of 1.5°C (Oct. 8, 2018), available at www.ipcc.ch/report/sr15/.

⁵ Intergovernmental Panel on Climate Change, Special Report on Global Warming of 1.5°C, Summary for Policymakers, SPM-21 (Oct. 8, 2018), available at http://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf.

⁶ Ibid, SPM-24.

⁷ Governor’s Office, Governor Brown to Travel to Bonn for UN Climate Conference (Nov. 03, 2017), available at www.oregon.gov/newsroom/Pages/NewsDetail.aspx?newsid=2396

⁸ PGE, Exploring Pathways to Deep Decarbonization for the Portland General Electric Service Territory (Apr. 24, 2018) www.portlandgeneral.com/-/media/public/our-company/energy-strategy/documents/exploring-pathways-to-deep-decarbonization-pge-service-territory.pdf?la=en

⁹ Ibid, p3.

resources is more than 90 percent of the total [by 2050].”¹⁰ Acknowledgment of PGE’s Final Short List would be a significant step towards decarbonizing the utility’s generation portfolio.

IV. CONCLUSION

Renewable Northwest is grateful to the Commission for this opportunity to comment on PGE’s request for acknowledgement of the Final Short List, which includes a diversity of technologies and transaction types. The Final Short List could be considered as part of Oregon’s leading role in the fight against the global challenge of climate change. Because of the significant potential benefits of PGE’s Final Short List, we respectfully recommend Commission acknowledgement.

Respectfully submitted this 25th day of October, 2018.

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¹⁰ Ibid, p34.