

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

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In the Matter of)	
Portland General Electric,)	COMMENTS OF THE
2018 Request for Proposals for)	NW ENERGY COALITION
Renewable Resources.)	
_____)	

The NW Energy Coalition (Coalition) appreciates the opportunity to comment on the Request for Acknowledgement of the Final Short List of Bidders in PGE’s 2018 Request for Proposals for Renewable Resources (Final Short List).

In our comments on the 2016 IRP, the Coalition stated, “we emphasize the importance of early action to create a more diverse resource mix and capture the available incentives while reducing compliance risk for the Oregon RPS.” Coalition comments, LC 66, May 16, 2017, at 6. We believe the Final Short List helps achieve those objectives.

PGE has listed six projects, notably including three in Oregon with varying combinations of wind, solar and batteries, and one wind project in Montana, with a total of 690 MW (nameplate) and 249 average MW (capacity factor) of bids. Final Short List at 17.

Additionally, it is evident that new resource prices that were considered too optimistic during the development of the 2016 IRP have become available during the bidding process, in addition to the welcome inclusion of cost-competitive combination bids including battery storage. This result also underscores the importance of open-ended RFPs to allow for resource innovation providing provide significant additional value to customers.

We also commend PGE, the Independent Evaluator, Staff and stakeholders for their cooperation in refining the RFP and making adjustments in preparing the initial and final short lists, following the Commission’s direction in Order No. 18-171. This has clearly improved the bid range and the depth and breadth of the Final Short List.

Finally, PGE has presented thorough portfolio and sensitivity analysis supporting the Final Short List showing favorable net costs and low rate impacts.

The Coalition takes note of these favorable aspects and encourages the Commission to acknowledge the Final Short List.

We hope that with best and final offers in hand, PGE will be able to acquire more than 100 aMW of new renewable resources that provide diversity in location and type. Such a result will be timely, cost effective, diversify supply, and improve overall system value, especially seasonal and daily diversity.

If the final acquisition includes projects with associated battery resources, this should substantially add to flexibility and overall system value, especially in addressing hourly and seasonal capacity needs at a very low incremental cost.

At the same time, acquisition of these projects will reduce exposure to market and fuel risk -- highlighted by the market price surge following the gas commodity price break in southern California in the summer of 2018, and the recent gas pipeline rupture in British Columbia.

The Final Short List also takes a first major step toward meeting the SB 1547 RPS requirements, supporting local government 100% clean energy goals and advancing Oregon climate policy.

It is imperative that we make deliberate, but aggressive steps toward the decarbonization of our electric sector, while enhancing affordability, safety and reliability on which customers depend.

Considering all these factors, the NW Energy Coalition strongly supports acknowledgement of the Final Short List.

Respectfully submitted this 25th day of October, 2018.

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