

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

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In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	NORTHWEST AND
COMPANY,)	INTERMOUNTAIN POWER
)	PRODUCERS COALITION
2018 Request for Proposals for)	COMMENTS ON STAFF’S REPORT
<u>Renewable Resources.</u>)	

I. INTRODUCTION

Northwest and Intermountain Power Producers Coalition (“NIPPC”) provides these final comments to the Public Utility Commission of Oregon (the “Commission”) regarding Portland General Electric Company’s (“PGE’s”) request for acknowledgement of its 2018 Request for Proposal (“RFP”) short list. NIPPC has reviewed the comments provided by Staff and other parties, and continues to recommend that the Commission acknowledge PGE’s final short list based on the short list being consistent with the Commission-approved RFP, and the Independent Evaluator’s (“IE”) determination that it will result in ratepayer savings.

II. COMMENTS

A. Staff Supports Acknowledgement

The Commission Staff submitted its final Staff report recommending that the Commission should acknowledge PGE’s final short list. Staff summarizes its recommendation in its final conclusion of the Staff Report:

The Commission should acknowledge PGE’s RFP final short list. This recommendation comes despite Staff’s stated concerns about the RFP’s overall competitiveness due to the limited number of viable alternatives remaining on the short list. Given the transmission and interconnection

requirements approved for the RFP by the Commission in Order No. 18-171, *this RFP represents the least cost and least risk option for PGE to meet its forecasted energy, capacity, and RPS compliance needs.*¹

B. NIPPC Continues to Support Acknowledgment

NIPPC's recommendation that the Commission acknowledge PGE's short list is bolstered and supported by the Staff Report. In the end, the RFP was fairly run using the transmission, interconnection and other requirements approved by the Commission, and the short list represents the least cost and least risk option for PGE to meet its forecasted energy, capacity, and renewable portfolio standard compliance needs.

NIPPC emphasizes that it is not taking positions on the IE's or Alliance of Western Energy Consumers' concerns regarding the project ranking or the Oregon Citizens' Utility Board's recommendation that the renewable acquisitions should be limited to 100 average megawatts. NIPPC is not taking positions on specifically how much power or which projects PGE should enter into contracts with, but is only recommending that the Commission should acknowledge the final short-list.

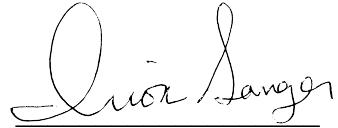
III. CONCLUSION

NIPPC recommends that the Commission acknowledge PGE's final RFP shortlist.

¹ Staff Report at 12-13 (Nov. 21, 2018) (emphasis added).

Dated this 29th day of November 2018.

Respectfully submitted,

A handwritten signature in cursive script, reading "Irion Sanger". The signature is written in black ink and is positioned above a horizontal line.

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