

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 616

In the Matter of

Rulemaking Related to RPS Planning Process
and Reports

STRAW PROPOSAL FOR RPS
RULEMAKING DOCKETS

Docket No. AR 616 covers RPS planning and reporting content and processes. This document is broken out into three sections.

The first section provides Staff’s view on the value of the Renewable Portfolio Standard Implementation Plans (RPIP) and Renewable Portfolio Standard (RPS) compliance report (Compliance Report). While Staff hopes a shared view of the value these reports add to the planning process will help guide the development of rules in this docket, Staff is not proposing any specific rule or language changes in this section. The second section of this document outlines issues for consideration at the next webinar. Stakeholders are free to, but not required to, provide comments on these first two sections.

The third section of this document is Staff’s Straw Proposal for changes to the process and contents of both RPIP and RPS Compliance Reports. Please review Staff’s proposal and submit any comments to the docket by **June 1, 2020**. Comments can be emailed to filingcenter@puc.state.or.us.

SECTION I:

At the launch of AR 616, Staff asked stakeholders to describe the function of the RPIP and Compliance Report. In response, most stakeholders commented along the lines that the RPIP was the action plan for RPS compliance while the Compliance Report was the confirmation that the plan was followed. Staff notes that participant engagement is low in the RPIP and high in the IRP in part because the IRP is where resource planning, including RPS compliance, is considered holistically and in depth.

Staff views the RPIP as planning that should be complementary to the IRP process. The incremental cost of compliance analysis is unique to the RPIP and RPS Compliance Reports. Staff sees this as the primary source of additional value provided by these reports. The RPIP helps the Commission and stakeholders understand the cost of compliance under an array of regulatory scenarios while the RPS Compliance Report provides assessment of real world factors affecting compliance costs. As Oregon takes steps towards meeting its renewable energy and

climate change goals, these reports provide valuable insight into the implications of our utilities' compliance with the RPS statute.

SECTION II: DISCUSSION ISSUES

While there are many areas of stakeholder agreement in AR 616, there are issues that have yet to be fully addressed. Staff plans to raise the following issues for further discussion at the next webinar.

- What value do the RPIP and Compliance Report bring that is not contained in an IRP?
- What constitutes a material deviation between the RPIP and Compliance Report?
- Are the RPS planning and reporting dockets the appropriate place to discuss REC management strategies?
- Besides co-location, what metrics are available for determining if energy storage is associated with a renewable energy project?

SECTION III: STAFF'S STRAW PROPOSAL

Renewable Portfolio Standard Implementation Plans (RPIP)

Timing:

- The utility should file their RPIP as a companion filing to the IRP or IRP update. If neither an IRP nor IRP update is filed with an RPIP within a two-year period, then the utility would need to file a stand-alone RPIP.
- Impacted Rules: 860-083-0400(1) & (8)

Planning Horizon:

- The RPIP planning horizon should be extended to ten years in order to capture long-term compliance strategies.
- Impacted Rules: OAR 860-083-0400(2)

Assumptions:

- Assumptions underlying the RPIP, specifically those used in calculating incremental cost, should be clearly identified consistent with OAR 860-083-0100.
- There should be no difference between RPIP and IRP assumptions and data.
- Impacted Rules: OAR 860-083-0400(2)(d-f)

Format:

- Staff believes that an updated reporting template would help stakeholders and the Commission more easily identify compliance concerns. At the conclusion of this rulemaking, Staff will submit an updated template incorporating all changes to the RPIP to the Commission for approval.

Additional Report Elements

- Forecasting Scenario and sensitivity requirements should be updated to reflect Oregon's renewable energy and climate change priorities, including Executive Order 20-04.
 - Impacted Rules: OAR 860-083-0400(2)(d-f); OAR 860-083-0400(4)(a) and (b)

- Cost Estimate – A forecast of the costs of using 20% unbundled renewable energy certificates for compliance
 - Impacted Rules: OAR 860-083-0400(2)

RPS Compliance Reports

Assumptions:

- Assumptions underlying the RPS Compliance Report, specifically those used in calculating incremental cost, should be clearly identified consistent with OAR 860-083-0100.
- Impacted Rules: 860-083-0350(2)(n-q)

Format:

- At the conclusion of this rulemaking, Staff will submit an updated template incorporating all changes to the RPS Compliance Report to the Commission for approval.

Natascha Smith

Utility Analyst, Energy Resources and Planning
(503) 559-7752 | natascha.smith@state.or.us