

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
AR 616**

In the Matter of

Rulemaking related to Renewable  
Portfolio Standard Planning Process and  
Reports

STAFF REQUEST FOR  
COMMENT  
FROM INTERESTED PARTIES

Staff of the Public Utility Commission of Oregon (PUC Staff or Staff) seeks input from stakeholders to help inform the second Staff-led workshop to address potential rulemaking regarding Renewable Portfolio Standard (RPS) Planning Process and Reports. The two primary objectives of this rulemaking are to: 1) update RPS rules related to the implementation plan (RPIP) and compliance report to reflect changes made in 2016's Senate Bill 1547 and 2) address outstanding RPS issues that Staff and stakeholders have identified throughout ongoing RPS implementation.

To prepare for the workshop, Staff requests that stakeholders review and answer the following 8 questions. Answers to these questions will allow Staff to prioritize issues to address in the workshop.

Staff requests that stakeholders submit responses to these questions by March 19, 2019. All comments should be submitted to the Commission's Filing Center at [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us). If you prefer not to comment on a particular question, please respond that you are choosing not to take a position on that issue at this time.

Dated this 26<sup>th</sup> day of February, 2019, Salem, Oregon.

*/s/ Thomas Familia*  
Thomas Familia  
Senior Utility Analyst

### **AR 616 Questions**

1. Please describe what you see as the respective functions of the RPIP and the Compliance Report? How does one complement the other? And, how do you think these reports relate to the IRP?
2. While the content for the RPIP and Compliance Reports is detailed in both OAR and statute, the requirements for these reports have remained a point of contention among parties. For example, understandings have differed as to what constitutes a material difference between an RPIP and the most recent IRP.<sup>1</sup> Please specify any criteria in addition to the statutory requirements that should be established for RPIP and Compliance Report filings.
3. The current timing of IRP filings and RPIPs are not coordinated, despite SB 1547 making the link between these two processes stronger. What are your recommendations to better connect the timing of the RPIP with the IRP<sup>2</sup>?
4. SB 1547 repealed the first-in first-out REC banking requirement and introduced Golden RECs into the RPS process. Both of these actions have long-term implications for RPS well beyond the current five year planning horizon required in the RPIP. Indeed, in both PGE's IRP (LC 66 – RPS Glidepath) and PAC's IRP (LC 67 – Energy Vision 2020) the Companies take a longer view of regulatory compliance benefits of near-term renewable resource acquisitions. Yet, these planned acquisitions were not found in either companies' RPIP or Compliance reports filed in 2018. Would it be more appropriate, given the longer-term impacts of the companies' renewable resource acquisitions and the ability to bank certain RECs beyond the compliance window, to have the RPIP and even the Compliance Reports include information that covers a longer time frame? Please specify what information, if any, should be included and explain your answer.
5. The RPIP rule specifies forecasts of several scenario and sensitivity requirements including expected incremental costs of new qualifying electricity, the expected incremental cost of compliance with the cost of unbundled RECs and alternative

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<sup>1</sup> RPIP requirements related to material differences criteria are defined in OAR 860-083-0400(4)

<sup>2</sup> RPIP timing requirements defined in OAR 860-083-0400(1) and ORS 469A.075(1)

compliance payments, and a forecast of the number and cost of bundled RECs issued.<sup>3</sup> For each of the above listed forecasts the rule also requires one forecast that assumes existing government incentives continue beyond their current expiration date and one that does not.<sup>4</sup> Are the required RPIP scenarios and sensitivities still appropriate?

6. Are there improvements to RPIP and RPS Compliance report formatting that should be made to more fully facilitate dissemination of information and review of the reports?<sup>5</sup>

7. How should "associated energy storage" as it is used in ORS 469A.120 be defined?

8. Are there any specific changes you would like to see to the administrative rules related to the Renewable Portfolio Standard Planning process and reports that was not addressed in the previous questions? What legal and/or policy justification is there for your position?

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<sup>3</sup> RPIP requirements relating to required forecasts are defined in OAR 860-083-0400(2)(d), (e), and (f)

<sup>4</sup> RPIP requirements relating to required government incentive forecasts are defined in OAR 860-083-0400(4)(a) and (b)

<sup>5</sup> Relating to RPIP reporting see PacifiCorp's submittal in UM 1914 or PGE's submittal in UM 1916. Relating to RPS Compliance reporting see PacifiCorp's submittal in Um 1959 or PGE's submittal in UM 1958.