



Portland General Electric Company

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Loretta I. Mabinton

Associate General Counsel

October 18, 2018

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398
Attn: Filing Center

RE: UM 1934 –Request for Proposals for Renewable Resources – Re-designation of Protected Information in Portland General Electric Company’s Request for Acknowledgment of the Final Shortlist and the Independent Evaluator’s Final Closing Report on PGE Request for Proposals for Renewable Resources

Portland General Electric Company (PGE) encloses two revised pages of its Request for Acknowledgment of Final Short List (Request) and three revised pages of the Independent Evaluator’s (IE) Final Closing Report (Report) in the Request for Proposals for Renewable Resources to reflect the removal of certain protected information designation.

PGE is appreciative of counsel for the Northwest and Intermountain Power Producers’ Coalition bringing to our attention the fact that the information on these pages do not need to be designated as protected information. PGE is not re-filing the complete Request or the complete IE Report since the pages that are being revised can be easily inserted, as replacement pages, in the documents Parties previously received.

The revised pages are:

Request for Acknowledgement of Final Shortlist -

1. Page 4
2. Page 29

Independent Evaluator Report –

1. Page 12
2. Page 19
3. Page 20

Copies of this filing will be provided to all parties and interested persons on the Public Utility Commission of Oregon’s service lists for Docket Nos. LC 66, UE 335, UM1613, and UM 1934.

Please direct any questions regarding this filing to me at (503) 464-7822.

Sincerely,

A handwritten signature in black ink that reads "Loretta Mabinton". The signature is written in a cursive, flowing style.

Loretta Mabinton
Associate General Counsel

LM:sj

Enclosures

Investment Tax Credits (ITCs) while simultaneously addressing energy and capacity needs that PGE will face following Boardman's cessation of coal fired operations in December 2020.

PGE, in collaboration with Staff, stakeholders and interested parties, designed the 2018 RFP in compliance with the Competitive Bidding Guidelines. PGE conducted the solicitation in accordance with the Commission approved 2018 RFP⁶ and with the active participation of and oversight by the Commission selected independent, third-party evaluator⁷, Bates White, as an Independent Evaluator (IE), ensuring a fair and transparent procurement process for all bidders.

The IE, in accordance with the Competitive Bidding Guidelines and as directed by the

Commission:

- Attended Pre-RFP Issuance workshops on March 2, 2018.
- Consulted with PGE during PGE's preparation of this 2018 RFP and submitted its assessment of the final draft RFP to the Commission on April 6, 2018.
- Reviewed and commented on PGE's Redline of the Draft RFP, and at the Commission's request, prepared an assessment⁸ of the 'open issues' prior to Commission approval of this 2018 RFP.
- Reviewed 'mock bids' to test the integrity of the evaluation models and reviewed final scoring and evaluation criteria.
- Conferred with OPUC staff.
- Oversaw the 2018 RFP process to ensure it was administered fairly.
- Separately evaluated and scored PGE's Benchmark bids.
- Reviewed all correspondence between bidders and PGE's RFP Evaluation Team.
- Reviewed all bids to ensure conformance with the 2018 RFP's identified requirements.
- Reviewed and edited all memoranda sent to bidders of non-compliant bids.
- Independently scored all bids to determine whether the selections for the initial and final short-lists were consistent with the bid evaluation criteria.
- Compared the results of the IE's scoring with PGE's scoring.
- Prepared a Final Closing Report for the Commission after PGE selected the final short list. The IE's report provides its assessment of all aspects of the solicitation

⁶ See Order No. 18-171

⁷ On May 9, 2017, PGE filed an application for the selection of an Independent Evaluator. On June 27, 2017, the Commission adopted Staff's recommendation to appoint Bates White, LLC as the IE.

⁸ See Bates White May 15, 2018 Memorandum re Review of PGE Redlines and Response to ALJ Questions. Also see Bates White's responses to the Commission questions at the May 16, 2018 Special Meeting.

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incremental action be taken. Table 7 below provides a summary of the results across each of the sensitivities.

Table 7: Updated RPS Need Forecasts and Sensitivities

Sensitivity	Physical shortage in 2025 (MWa)	REC deficit year	RPS shortage in following year (MWa)
Reference	87	2031	395
QF Executed 50%	172	2029	424
QF Proposed 50%	0	2035	794
Zero Load Growth	24	2035	504
20% Unbundled RECs	0	2033	20

The QF completion cases show that PGE’s near-term physical RPS shortage is highly sensitive to the assumed QF completion rate, as a large quantity of QFs have indicated their intention to contractually commit to come online and produce RECs in the early 2020s. The analysis also found that PGE’s longer term RPS needs are less sensitive to the QF completion rate assumption, due largely to the scale of the increase in RPS obligations over time and the expiration of QF contracts.

5. Procurement Strategy & Risks

The 2018 RFP final short list includes three unique projects from three bidders. Two of the proposed projects would be built and located in Oregon, the other in Montana. The maximum nameplate capacity of the three projects is 690 MW. The projects included in the final short list are summarized in Table 8 below.

~~PROTECTED INFORMATION SUBJECT TO GENERAL PROTECTIVE ORDER NO. 18-063~~ This information is Public; no longer Protected Information under Protective Order No. 18-063

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