

1 determine the amount and timing of resources the amount and timing of resources needed on an
2 annual basis to ensure sufficient energy and capacity is available to meet future system loads.
3 *See* Staff/200, Durrenberger/4; PPL/100, Warnken/3; PGE/100, Kuns-Drennan/7-8. In other
4 words, the utilities' energy and capacity load resource balances determine when the next base
5 load resource is needed. Resource sufficiency/deficiency is an outcome of the IRP process as
6 described in the response to Issue 1.

7 **3. Issue 3: What loads were used to compute the load forecast?**

8 A utility should use the same load forecasts as appear in its most recently acknowledged
9 IRP. *See* Staff/100, Durrenberger/6-7; PGE/100, Kuns-Drennan/8-9.

10 **4. Issue 4: Is it appropriate to determine resource sufficiency for avoided cost**
11 **filings in a different manner than is used to determine resource needs for the IRP**
12 **planning process?**

12 Staff advocates that a utility should use its IRP as the basis for the resource
13 sufficiency/deficiency determination and agrees with PPL's and PGE's testimony on this issue.
14 *See* Staff/100, Durrenberger/7; Staff/200, Durrenberger/2-3; PPL/100, Warnken/6-7; PGE/100,
15 Kuns-Drennan/9-11.

16 **5. Issue 5: Must a utility be both capacity and energy deficient to be in a position of**
17 **resource deficiency?**

18 After further review of the parties' testimony, staff refines its position on Issue 5. Staff
19 agrees with PPL and PGE that both capacity and energy are important components of IRP
20 planning. *See generally* PPL/100, Warnken/7-8; PPL/101, Warnken/2-4; PGE/100, Kuns-
21 Drennan/11-12. Simply stated, an IRP considers the following three components: (1) an
22 energy/resource balance; (2) a capacity/resource balance; and (3) a schedule for the addition of
23 new resources. Component (3) is based upon and derives from Components (1) and (2). Staff's
24 earlier testimony focused on the energy component {i.e. Component (1)}. Upon further
25 reflection, staff finds PPL's and PGE's testimony persuasive that the more comprehensive
26 approach is to consider both energy and capacity. Component (3), the schedule for the addition

1 of new resources, should be based upon and closely aligned with Components (1) and (2). *See*
2 *also* Staff/102; Durrenberger/4-25 (staff witness Maury Galbraith testimony and supporting
3 exhibits filed in UM 1129).

4 **6. Issue 6: How should resource energy and capacities be determined?**

5 Again, after review, staff finds PPL's and PGE's testimony (and the reasoning contained
6 therein) on this issue to be persuasive: resource sufficiency and deficiency should be determined
7 in the context of the IRP. *See* PPL/100, Warnken/8; PGE/100, Kuns-Drennan/12-13.

8 **7. Issue 7: What resources go into the determination of sufficiency/deficiency?**

9 The resources that are included in a utility's most recently acknowledged IRP are
10 appropriate to consider for the determination of resource sufficiency/deficiency. *See* PPL/100,
11 Warnken/8-10; PGE/100, Kuns-Drennan/13-14.

12 **8. Issue 8: How do multiple jurisdictional utilities calculate resource sufficiency?**

13 Multiple jurisdictional utilities should be analyzed on a whole-company basis. Staff/100,
14 Durrenberger/11; PPL/100, Warnken/10.

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16 DATED this 9th day of July 2009.

17 Respectfully submitted,

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1 **CERTIFICATE OF SERVICE**

2 I certify that on July 9, 2009, I served the foregoing Staff Opening Brief upon all parties
3 of record in this proceeding by delivering a copy by electronic mail and by mailing a copy by
4 postage prepaid first class mail or by hand delivery/shuttle mail to the parties accepting paper
5 service.

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