

ORDER NO. 12 2 15

ENTERED JUN 07 2012

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1535

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Request for Proposals for Capacity and  
Baseload Energy Resources.

ORDER

DISPOSITION: FINAL DRAFT RFP APPROVED WITH CONDITIONS

**I. INTRODUCTION**

In this order, we approve, with conditions and clarifications, Portland General Electric Company's combined final draft Request for Proposal (RFP) for capacity and energy resources. PGE filed the RFP in compliance with Commission Order No. 11-371, in which we directed PGE to combine its RFP seeking seasonal peaking capacity and flexible capacity resources with its RFP seeking 300-500 MW of baseload energy.

**II. PROCEDURAL HISTORY**

On February 22, 2012, Northwest and Intermountain Power Producers Coalition (NIPPC), the Industrial Customers of Northwest Utilities (ICNU), the Citizens' Utility Board of Oregon (CUB), and Commission Staff filed comments on PGE's RFP. PGE filed reply comments on March 7, 2012. On May 11, 2012, NIPPC, ICNU, and Staff filed comments on the technical specifications. PGE filed reply comments on May 18, 2012.

On May 14, 2012, the Independent Evaluator (IE) filed its report. The IE found the documentation provided by PGE is "sufficiently complete," so that "an experienced construction firm could provide a comprehensive bid using the materials as provided."

At the June 5, 2012 Public Meeting, Staff recommended we approve the final draft RFP with certain requirements. Following extensive discussion, we took this matter under advisement.

### III. DISCUSSION

#### A. Gas Storage and Intraday Scheduling

##### 1. *Parties' Positions*

According to NIPPC, ICNU, and CUB, PGE's draft RFP places unreasonable restrictions on bidders who seek to provide a traditional tolling service agreement, by requiring tolling agreement bidders to actually procure and secure gas storage and transport rights. NIPPC notes that under a typical tolling arrangement the buyer pays the seller for the use of seller's facility to convert fuel in to electrical energy.

##### 2. *Resolution*

This issue was raised by these same parties in the first phase of this proceeding. In Order No. 11-371 we stated:

We agree with PGE that bidders must demonstrate that they have a plan to acquire gas storage and intraday scheduling to be eligible to participate in the RFP for flexible capacity. We do not believe that PGE has any special advantage in acquiring these services. Rather, the ability to obtain them is largely location-dependant.<sup>1</sup>

There is no indication that circumstances have changed. The parties have not shown that they are not able to make their own arrangements for gas storage and transportation on terms and conditions that are as favorable (or more favorable) than the arrangements made by PGE.

#### B. Allocation of Transmission Costs

##### 1. *Parties' Positions*

NIPPC, ICNU, and CUB raised the issue of whether PGE is properly allocating transmission costs to its benchmark resources. NIPPC notes that PGE's existing transmission system cannot integrate either of the company's two benchmark resources. ICNU notes that PGE, in its 2009 IRP, identified a need for self-build transmission resources to integrate its benchmarks. NIPPC suggests these costs should be included in the benchmark's bid price. PGE replied that it does not need to make transmission improvements to deliver energy from its benchmark resources. PGE says it has no plans to build South of Alston and will only build Cascade Crossing if it proves to be cheaper than the use of the Bonneville transmission system.

---

<sup>1</sup> Order No. 11-371 at 4 (Sept 27, 2011).

## **2. Resolution**

The issue in this proceeding is to ensure the fairness of the bidding process. PGE's claim that it does not need to build new transmission resources leaves its benchmark resources in the same position as the other possible resources proposed at the same (or nearby) sites with respect to transmission. This claim is consistent with PGE's IRP and this position does not affect the level playing field.

At the June 5, 2012 Public Meeting it was made clear that the alternative to PGE's self-build transmission is the same for all parties – access to the Bonneville Power Administration's transmission system. Thus, the bid evaluation will be based on the same transmission costs for all similarly situated potential bidders.

In its May 29, 2012 Staff Report, attached as Appendix A, Staff recommended the Commission approve the draft RFP with the condition that PGE provide additional information to the IE regarding the company's transmission assumptions. Given our disposition of this issue, the additional information is not required.

### **C. Release of Detailed Scoring Methodology**

#### **1. Parties' Positions**

The draft RFP provides the bid scoring categories, identifies the maximum score available for each category, identifies the maximum percent of the total score represented by each category, and provides a description of the content of each category. NIPPC and CUB argue that the draft RFP evaluation criteria should provide a greater level of specificity for the scoring weight of individual characteristics. PGE counters that detailed scoring criteria should not be released to bidders to avoid the potential for "gaming."

#### **2. Resolution**

We are not persuaded that PGE's gaming concerns outweigh the public interest in transparency in the bidding process. Disclosure of the detailed scoring weights will assist all bidders in focusing their bids.

The purpose of the initial bids is to establish an initial "short list." Once the short list has been established, PGE will refine its bid evaluation to establish a final short list and then conduct negotiations with firms on the final short list. Accordingly, we require PGE to provide all bidders the detailed scoring weights used to evaluate the bids.

**D. Owner's Costs****1. Parties' Positions**

Staff notes that PGE's estimated owner's costs will form part of the basis for selecting the winning bids. Staff is concerned about passing on to ratepayers the overruns (or underruns) of owner's costs. In docket UM 1182, Staff and the utilities recommend addressing this issue in detail. For purposes of this proceeding, Staff recommends the Commission address the company's owner costs in future rate cases.

**2. Resolution**

We adopt Staff's recommendation.

**E. Double Penalty**

At the Public Meeting, the parties expressed concerns regarding contract language that might be interpreted to impose a "double penalty" on generators under certain circumstances. After discussion, PGE agreed to modify the contract language to address the parties' concerns.

**F. Turbine Manufacturers****1. Positions of Parties**

In its May 14, 2012 report, the IE noted the Commission's decision in the Pacific Power, dba PacifiCorp (PacifiCorp) all-source RFP docket (UM 1540) to allow bidders to propose alternatives to the turbine PacifiCorp identified in its specifications. The IE believes it would be appropriate for prospective bidders in this RFP to be required to disclose their intent to propose a different turbine manufacturer well in advance of the bid date, and, further, to share the make and model of each alternative turbine or engine.

Staff recommends that PGE be required to allow for additional flexibility in selection of baseload combustion turbine manufacturers, and reciprocating engine manufacturers. PGE argues that the manufacturers bid must be only those included in its technical specification, because of the potential impact on completed environmental permitting.

**2. Resolution**

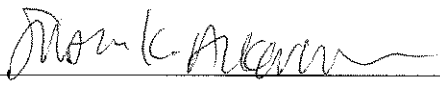
We agree with Staff that there is a possible ratepayer benefit from increased competition resulting from allowing for more manufacturers. We direct PGE to allow additional flexibility in selection of baseload combustion turbine manufacturers, and reciprocating engine manufacturers. We adopt the IE's recommendation that prospective bidders be required to disclose their intent to propose a different manufacturer to PGE not later than July 2, 2012.

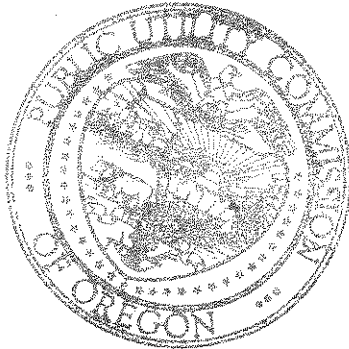
**IV. ORDER**

It is ordered that Portland General Electric Company's final draft Request for Proposals is approved, subject to the conditions and clarification specified in this order.

Made, entered, and effective JUN 07 2012.

  
**John Savage**  
Commissioner

  
**Susan K. Ackerman**  
Commissioner



**COMMISSIONER BLOOM WAS  
UNAVAILABLE FOR SIGNATURE**  
**Stephen M. Bloom**  
Commissioner

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.

ITEM NO. 3

PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: June 5, 2012

REGULAR   X   CONSENT        EFFECTIVE DATE        <sup>Upon</sup>  
Commission Approval

DATE: May 29, 2012

TO: Public Utility Commission

FROM: Erik Colville *EC*

THROUGH: Jason Eisdorfer and Maury Galbraith *MG*

SUBJECT: PORTLAND GENERAL ELECTRIC COMPANY: (Docket No. UM 1535)  
Request for Proposals for Capacity and Baseload Energy Resources.

**STAFF RECOMMENDATION:**

Staff recommends the Commission approve Portland General Electric's (PGE) final draft Request for Proposals (RFP) – Power Supply Resources, with the following requirements:

- PGE is to provide sufficient information for the IE to confirm the assumption that bids using PGE's sites do not require either the Cascade Crossing or improvements to the South of Allston path, and if the IE is not able to confirm the assumption, to provide sufficient information to support development of Cascade Crossing and South of Allston path improvement cost allocations for bids using PGE's sites. Staff recommends this information be provided by PGE within 30 days of Commission approval of the final draft RFP.
- PGE is to include flexibility in selection of baseload combustion turbine manufacturers and reciprocating engine manufacturers in addition to that provided in its technical specifications as an alternate engineer-procure-construct (EPC) or build-own-transfer (BOT) bid.

**DISCUSSION:**

Staff's report is organized into three sections. The first section provides a summary of Staff's discussion and recommendations. The second section is a summary of the Oregon Independent Evaluator's (IE) assessments of the final draft RFP and

Docket No. UM 1535  
May 29, 2012  
Page 2

specifications. Finally, the third section discusses the criteria that the Commission focuses on in approving an RFP.

On May 23, 2011, PGE issued its final draft capacity resource RFP. The purpose of the capacity resource RFP was to implement Action Plan Items 11 and 12 in the 2009 Integrated Resource Plan (IRP) to acquire 200 MW of flexible peaking capacity by year-end 2013, 131 MW of bi-seasonal peaking capacity, and 152 MW of winter-only peaking capacity resources. In the Commission's September 27, 2011, Order No. 11-371, the Company was directed to combine the capacity resource RFP and the upcoming baseload energy resource RFP. PGE filed its draft combined capacity and baseload energy resource RFP on January 5, 2012, and its final draft combined RFP on January 25, 2012. The final draft combined RFP seeks to implement, in addition to Action Plan Items 11 and 12, the 2009 IRP Action Plan Item 10 to acquire 300-500 MW of baseload energy generation by year-end 2015.

When the final draft combined RFP was issued in January, the technical specifications, site specifications, and owner's costs (technical specifications) for EPC bids on PGE's sites were not yet complete. The Company issued the technical specifications on April 27, 2012. The final draft combined RFP and technical specifications are hereinafter referred to as the final draft RFP.

On February 22, 2012, Northwest and Intermountain Power Producers Coalition (NIPPC), Industrial Customers of Northwest Utilities (ICNU), and Citizens' Utility Board of Oregon (CUB) filed comments in response to PGE's final draft combined RFP. PGE filed reply comments March 7, 2012. On May 11, 2012, NIPPC and ICNU filed comments on the technical specifications, followed by PGE's reply comments on May 18, 2012.

### **Staff's Discussion and Recommendations**

Before proceeding to discuss the specific issues in this docket, Staff wishes to highlight the goals the final draft RFP in this docket must accomplish. The final draft RFP is one element of the competitive bidding guidelines. Order No. 06-446 presents the competitive bidding goals as:

1. Provide the opportunity to minimize long-term energy costs, subject to economic, legal and institutional constraints;
2. Complement Oregon's integrated resource planning process;
3. Not unduly constrain utility management's prerogative to acquire new resources;

Docket No. UM 1535

May 29, 2012

Page 3

4. Be flexible, allowing the contracting parties to negotiate mutually beneficial exchange agreements; and
5. Be understandable and fair.

In Staff's review of the final draft RFP the following four issues of substance were identified for discussion: Gas Storage and Intraday Scheduling; Allocation of Transmission Costs; Release of Detailed Scoring Methodology; and Owner's Costs. This is not to say there were no other issues raised in the docket, but rather that these rise to the top in terms of substance. These four issues are presented and discussed below in the context of the competitive bidding goals.

#### 1. Gas Storage and Intraday Scheduling

NIPPC, ICNU, and CUB all comment that PGE's final draft RFP places unreasonable restrictions on bidders who seek to provide a traditional tolling service agreement. The unreasonable restrictions are in the form of requiring tolling agreement bidders to actually procure and secure gas storage and transport rights. NIPPC notes that under a tolling arrangement, the Buyer pays the Seller for the use of Seller's facility to convert fuel into electrical energy.

In Order No. 11-371, when addressing this very issue, the Commission stated "We agree with PGE that bidders must demonstrate that they have a plan to acquire gas storage and intraday scheduling to be eligible to participate in the RFP for flexible capacity. We do not believe that PGE has any special advantage in acquiring these services. Rather, the ability to obtain them is largely location-dependant."

Staff does not see that the conditions surrounding this issue have changed and therefore concludes that the Commission's ruling in Order No. 11-371 still applies. As a result, it is not unreasonable to require all flexible capacity resource bidders (those that rely on natural gas fuel) to acquire gas storage and intraday scheduling of fuel to be eligible to participate in the RFP. Staff concludes that PGE has addressed gas storage and intraday scheduling in an understandable and fair manner which is aligned with Order No. 11-371. Staff therefore does not recommend a change to the final draft RFP in this regard.

#### 2. Allocation of Transmission Costs

NIPPC, ICNU, and CUB all express concern related to whether PGE is properly allocating transmission costs to its benchmark resource. NIPPC notes that PGE's



Docket No. UM 1535

May 29, 2012

Page 4

existing transmission system cannot integrate either of its two benchmarks. Further noting that PGE in its 2009 IRP articulated the need for self-build transmission resources to integrate its benchmarks, NIPPC suggests these costs should be included in the benchmark's bid prices.

PGE replies it does not need to make improvements to the South of Allston path to deliver energy from the Port Westward II benchmark resource. PGE also states it does not need to build Cascade Crossing to deliver energy from the Carty benchmark resource. PGE comments that it does not believe bids should be allocated a share of the cost of a potential transmission project that is not needed to deliver energy from the resource to load.

In its technical specifications, PGE outlines its interconnection approach for both the capacity and baseload energy benchmark resources, primarily using the existing transmission system. New transmission elements required to connect to the existing transmission system (such as control building additions, reconductoring, substation modifications, etc) are included in the owner's costs as capital cost line items that will be applied in evaluating all bids using PGE's sites, as appropriate for each site. The bid scoring and evaluation process is intended to capture the costs associated with transmitting energy, based on widely available tariff rates.

In Order No. 11-371, the Commission stated "The RFP should provide for a level playing field. The parties have raised specific concerns about how PGE will allocate transmission costs to the self-build option...As PGE develops this combined RFP, we direct PGE and the IE to share, under the terms of an appropriate protective order, the proposed cost allocation. The parties may then address this allocation when PGE seeks approval of the combined RFP."

On the assumption that bids using PGE's sites do not require either the Cascade Crossing or improvements to the South of Allston path, the IE found the transmission-related data to be consistent with industry standard data, and was adequate to establish that PGE has a plan for completing transmission interconnection, should construction be undertaken at either of its sites. Further, the IE found that information, including transmission cost estimates, was in sufficient detail to permit a competent bidder to prepare a comprehensive and conforming response.

Staff and the IE discussed the assumption that bids using PGE's sites do not require either the Cascade Crossing or improvements to the South of Allston path. The IE has requested from PGE, but was not provided at the time of writing this Staff Report, sufficient information to verify the validity of this assumption. Such

Docket No. UM 1535

May 29, 2012

Page 5

information is pivotal to concluding whether the final draft RFP provides for a level playing field, is reasonable and fair, and is aligned with Order No. 11-371. If PGE provides sufficient information for the IE to confirm the assumption, then Staff can conclude that PGE's proposed approach to transmission provides for a level playing field, is reasonable and fair, and is aligned with Order No. 11-371. Staff therefore would not recommend a change to the final draft RFP in this regard. If sufficient information is not provided, or if the provided information does not support the assumption that bids using PGE's sites do not require either the Cascade Crossing or improvements to the South of Allston path, then the IE would need sufficient information regarding load flow and costs for Cascade Crossing and South of Allston path improvements to develop appropriate cost allocations.

Staff considered whether a delay in final draft RFP approval is warranted due to uncertainty surrounding the need for the Cascade Crossing or improvements to the South of Allston path to deliver energy from bids using PGE's sites. Staff concludes that the issue is resolved without delaying approval through PGE providing information to the IE that will either: confirm no need for the new transmission resources and thus no need to allocate those costs; or confirm the need for the new transmission resources, the cost of those new transmission resources, and a methodology for allocating those costs.

Staff recommends the Commission require PGE to provide sufficient information for the IE to confirm the assumption that bids using PGE's sites do not require either the Cascade Crossing or improvements to the South of Allston path, and if the IE is not able to confirm this assumption, to provide sufficient information to support development of Cascade Crossing and South of Allston path improvement cost allocations for bids using PGE's sites. Staff recommends this information be provided by PGE within 30 days of Commission approval of the final draft RFP.

### 3. Release of Detailed Scoring Methodology

NIPPC and CUB comment that the final draft RFP's evaluation criteria should provide a greater level of specificity for the scoring value of individual characteristics of a bid. PGE's position is that to avoid "gaming" the detailed scoring criteria should not be released to bidders. The final draft RFP provides the bid scoring categories, identifies the maximum score available for each category, identifies the maximum percent of the total score represented by each category, and provides a description of the content of each category.

Staff discussed this issue with the IE. Both Staff and the IE agree that the final draft RFP presents sufficient scoring information so bidders know how to configure their

Docket No. UM 1535  
May 29, 2012  
Page 6

bids to meet PGE's preferences. Staff and the IE also agree that releasing detailed scoring criteria has no clear benefit to the competitive bidding process, and releasing detailed scoring criteria could result in gaming. As a result, Staff does not recommend a change to the final draft RFP in this regard.

#### 4. Owner's Costs

Staff notes that PGE's estimated owner's costs will form part of the basis for selecting the winning bids. Staff is concerned about passing on to ratepayers the overruns or underruns of owner's costs. In Docket No. UM 1182, Staff and the utilities recommend addressing this issue in detail. For the purposes of this docket UM 1535, Staff recommends the Commission address the Company's owner costs in future ratemaking cases. Staff believes doing so will help ensure a fair and transparent process, and aid in addressing differences in risk profiles between benchmark bids, EPC contract bids, and other third-party bids.

#### Summary of the Oregon IE Assessment

On February 8, 2012, the IE submitted an assessment<sup>1</sup> of PGE's final draft capacity and baseload energy resource RFP. The IE reports that PGE has acted in good faith with all bidders, and created protocols and documents that will permit the RFP to be conducted in a fair and transparent manner. The protocols previously adopted for the capacity resource RFP will continue to be employed, with additional procedures for access to PGE site specific data, and for EPC bidders. The IE believes this RFP is, and can be, conducted in a fair and unbiased manner.

The IE found PGE to be receptive to recommendations for improving the detail and clarity of the final draft combined RFP documents. The modifications made by PGE in response to Order No. 11- 371 addressed the issues identified by the Commission, especially the combination of the Capacity and Energy RFPs, and the addition of the ability for bidders to propose projects on PGE sites. The evaluation process has also adequately been adjusted to accommodate baseload gas products, the exclusion of imputed debt costs, refinement of the credit requirements, the timing of scoring impacts due to dynamic transfer rights, and the allocation of costs to benchmark bid options.

---

<sup>1</sup> The Independent Evaluator Assessment – Final Draft RFP was filed February 9, 2012, and can be found at the following internet address: <http://edocs.puc.state.or.us/edocs/HAH/um1535hah11313.pdf>.

Docket No. UM 1535  
May 29, 2012  
Page 7

On May 11, 2012, the IE submitted an assessment<sup>2</sup> of PGE's technical specifications (including the technical specifications, site specifications, and owner's costs). The IE reported that the technical specifications are voluminous, and provide sufficient detail to permit a knowledgeable bidder to prepare a comprehensive and conforming bid at either of PGE's sites. The owner's cost materials are of sufficient detail that bidders will know which aspects of the projects are the responsibility of PGE, and not the bidder. Similarly, the owner's costs provide sufficient detail to assure the bidders that PGE has plans in place that would permit a bidder to meet the in-service obligation at either site.

On the assumption that bids using PGE's sites do not require either the Cascade Crossing or improvements to the South of Allston path, the IE found the transmission-related data to be consistent with industry standard data, and is adequate to establish that PGE has a plan for completing transmission interconnection, should construction be undertaken at either site. The information, including transmission cost estimates, is in sufficient detail to permit a competent bidder to prepare a comprehensive and conforming response.

The IE included an attachment to its assessment which contains a list of possible areas for clarification of the design materials already provided by PGE. The IE encouraged PGE to review the list and consider addressing some or all of the items prior to the site visits. While the IE provided this list, it should not be seen as a suggestion by the IE that any of the documents are flawed.

Lastly, the IE is mindful of the Commission's decision in the PacifiCorp all-source RFP docket (Docket No. UM 1540) to permit bidders to propose alternatives to the turbines PacifiCorp identified in its specifications. The IE believes it would be appropriate for prospective bidders in this RFP to be required to disclose their intent to propose a different turbine manufacturer well in advance of the bid date, and further, to share the make and model of each alternative turbine or engine. PGE's reply comments state that the manufacturers bid must be only those included in its technical specification. The Company takes this position because of the potential impact on completed environmental permitting, as well as utilization of those manufacturers in its benchmark resource bid.

Staff agrees with the Company that including additional turbine or reciprocating engine manufacturers for bidding flexibility could impact environmental permitting. Staff also agrees that for the flexible capacity resource, the restricted turbine manufacturer and technology was confirmed in Commission Order No. 11-371. However, considering

---

<sup>2</sup> The Independent Evaluator Assessment – Technical Specifications, Site Specifications, and Owner's Costs was filed May 14, 2012, and can be found at the following internet address:  
<http://edocs.puc.state.or.us/efdocs/HAH/um1535hah15646.pdf>.

Docket No. UM 1535  
May 29, 2012  
Page 8

there are additional baseload combustion turbine manufacturers with a wealth of baseload generation experience, and other reciprocating engine manufacturers with extensive fast-response generation experience, there is the possibility of a ratepayer benefit from increased competition by allowing for more than the currently specified manufacturers. Staff therefore recommends the Commission require PGE to allow for additional flexibility in selection of baseload combustion turbine manufacturers and reciprocating engine manufacturers, as an alternate EPC or BOT bid. In addition, Staff agrees with the IE's recommendation that prospective bidders be required to disclose their intent to propose a different manufacturer well in advance of the bid date. Staff suggests July 2, 2012, as the last date prospective bidder's disclosure will be accepted.

### **Commission Decision Criteria**

The Commission uses three criteria to judge RFP approval:<sup>3</sup>

1. The alignment of the utility's RFP with its acknowledged IRP.<sup>4</sup>
2. Whether the RFP satisfies the Commission's competitive bidding guidelines.
3. The overall fairness of the utility's proposed bidding process.

#### IRP Alignment

The Company's 2009 IRP Action Plan called for 200 MW of flexible peaking capacity by year-end 2013, 131 MW of bi-seasonal peaking capacity, and 152 MW of winter-only peaking capacity resources, and 300-500 MW of baseload energy generation by year-end 2015. Staff believes acquisition of these resources is consistent with the acknowledged IRP.

#### Competitive Bidding Guidelines

The IE has indicated that the final draft RFP aligns with Commission Guidelines. Guideline 6 requires the RFP set forth minimum bidder requirements, bid evaluation and scoring criteria, and include standard form contracts. The Guideline also requires a draft RFP be provided to all parties in the utility's most recent general rate case, RFP and IRP dockets. In addition, the utility is required to conduct bidder and stakeholder workshops. Further, the utility is required to submit a final draft RFP to the Commission for approval. Staff believes that PGE has complied with Guideline 6 and therefore agrees with the IE that the final draft RFP aligns with the Commission Guidelines in Order No. 06-446.

<sup>3</sup> See Guideline 7, Order No. 06-446 (at 9).

<sup>4</sup> On November 23, 2010, the Commission acknowledged PGE's 2009 IRP in part, including the company's plan to acquire 200 MW of flexible peaking capacity by year-end 2013, 131 MW of bi-seasonal peaking capacity, and 152 MW of winter-only peaking capacity resources, and 300-500 MW of baseload energy generation by year-end 2015. See Order No. 10-457 in Docket LC 48.

Docket No. UM 1535  
May 29, 2012  
Page 9

Overall Fairness of the Proposed Bidding Process

The IE has monitored every aspect of the RFP process to date and has indicated that the RFP is being conducted in a fair and unbiased manner. As a result, Staff believes this criterion has been met.

**PROPOSED COMMISSION MOTION:**

The Commission approve Portland General Electric's final draft Request for Proposals – Power Supply Resources, with the following requirements:

- PGE is to provide sufficient information for the IE to confirm the assumption that bids using PGE's sites do not require either the Cascade Crossing or improvements to the South of Allston path, and if the IE is not able to confirm the assumption, to provide sufficient information to support development of Cascade Crossing and South of Allston path improvement cost allocations for bids using PGE's sites. PGE must provide this information within 30 days of Commission approval of the final draft RFP.
- PGE is to include flexibility in selection of baseload turbine and reciprocating engine manufacturers in addition to that provided in its technical specifications as an alternate engineer-procure-construct (EPC) or build-own-transfer (BOT) bid.

Docket No. UM 1535 Capacity and Baseload Energy Resource RFP