

utility integrated resource plans. We propose additional language to Staff's third substantive requirement in guideline #1, as well as to guideline #9, directing utilities to include an imputed value for carbon dioxide emissions in their IRP base cases. We also reiterate our request to the Commission from our opening comments to open a proceeding at the close of this docket into the appropriate value for CO2 that utilities should use in their IRPs, similar to that implemented by the California PUC in April.

Obviously we are in fundamental disagreement with ICNU's take on global warming as a "non-mandated social goal." ICNU's Opening Comments at 7. ICNU advises only considering short-term cost implications in planning; they suggest removing the language in the 1989 Order for IRPs to be "consistent with the long-run public interest." Instead, we believe IRPs are exactly the venue for utilities to anticipate and prepare for future regulation that will directly impact ratepayers. As we have stated before, most knowledgeable observers believe it is only a matter of when, not whether, greenhouse gas emissions will be regulated in the U.S. Waiting until that time to prepare is not a prudent decision, in our opinion, because it creates serious risk of stranded assets and/or high compliance costs.

Finally, PacifiCorp opposes Staff direction in guideline #9 for compliance cost projections to "consider damages from pollution and estimates of mitigation costs." PacifiCorp Opening Comments at 18. We support the Staff recommendation. Estimates of the costs of mitigation or damage are useful surrogates for future compliance costs and so are a good starting point for estimating possible regulatory costs that may be required in the future.

Guideline #15

Utility Ownership vs. Rental of Resources

We propose one addition to Staff's guideline #15 related to utility's acquisition strategy. We ask that utilities explore the pros and cons of ownership of resources vs. "rental" in the IRP. PacifiCorp does not agree with Staff's direction in guideline #15, arguing instead for the self-build discussion to occur in the context of an RFP. PacifiCorp Opening Comments at 13. We believe, on the other hand, that the IRP is the right forum to discuss this issue, given the increasing focus on utility ownership in the region. The actual decision to pursue one or the other will occur during the RFP, but an exploration of costs, risks and benefits of ownership vs. rental should occur in the IRP.

Other Issues in Opening Comments

Update to Order 89-507

Both PacifiCorp and PGE argue for a less prescriptive approach than Staff's proposed guidelines, preferring instead to simply update Order 89-507. We believe there is a lot worth preserving in the 1989 Order; it was an Order far ahead of its time in terms of focus on long term issues and costs that are external to the utility. On the other hand, we support Staff's proposal in this docket which incorporates many lessons learned over

the past 15 years. We believe Staff has retained what was good from the 1989 Order while adding requirements to better reflect today's energy issues.

What the IRP Is and Isn't

In their discussion of what acknowledgment means in an IRP, PacifiCorp raises a troubling issue.

“Therefore, when the Commission acknowledges an IRP or Action Plan and accordingly, finds that it ‘seems reasonable’ at that point in time, the Commission should also make clear that it will not revisit in a subsequent proceeding the question of what was known and knowable at the time of that IRP planning cycle. If parties who have participated in the process are later allowed to present information that was known and knowable during that prior process, and they chose not to put forth, the IRP process will ultimately have little value to the Commission, the parties and the utilities.” PacifiCorp Opening Comments at 22.

What PacifiCorp proposes is the greater part of a preapproval process where the aspect of prudence that looks at what the utility knew at the IRP stage would be determined prior to the process that looks at the reasonableness of the actual investment. If, as PacifiCorp suggests, the Commission does not revisit this question in a rate case, it necessarily means that the IRP process becomes a contested case proceeding. PacifiCorp's proposal assumes that parties to an IRP process have access to all information that is “knowable” at the time and are expert enough to ask for it. It also assumes that all parties are able to fully participate in an IRP process. The reality is otherwise. While the utility has access to all information that was “known or knowable” during the IRP process, it is inaccurate to suggest that all parties do.

In order to adopt PacifiCorp's proposal, the IRP process would have to be redefined to enlarge the scope of discovery. PacifiCorp's IRP in the mid-1990s, which became a hundred million dollar issue in UM 995, is an example of parties not having access to critical information or even knowing they should have asked to see existing information, such as output contracts from PacifiCorp's resources, risk policies or board minutes to establish what the utility knew at the time. This is because IRPs traditionally take on a less adversarial tenor to encourage parties' freedom to explore possibilities, solicit new ideas, enable flexibility, etc. A contested case, which would be required if the IRP process determined absolutely the future record for rate making proceedings, requires certain procedural elements that would interfere with the more collegial concept of the IRP.

We oppose turning the IRP into a contested case and we oppose limiting investigation of investment decisions in the appropriate prudence review. Thus, we fundamentally disagree that parties should be somehow limited in a later proceeding from offering information relevant to a decision made in an IRP.

**Staff's Proposed Guidelines
Integrated Resource Planning for Energy Utilities¹
Docket UM 1056**

1. The plan must meet four substantive requirements:

One, all resources² must be evaluated on a consistent and comparable basis.

- All known resources for meeting the utility's load must be considered, including supply-side options which focus on the generation, purchase and transmission of power – or gas purchasing and transportation – and demand-side options which focus on conservation and demand response.
- Utilities should compare resource fuel types, technologies, lead times, in-service dates, durations and locations in portfolio risk modeling.
- Consistent assumptions and methods should be used for evaluation of all resources.
- The real after-tax marginal weighted-average cost of capital should be used to discount all future resource costs.
- Utilities should analyze how their preferred portfolio would change over a range of reasonable discount rates.

Two, uncertainty must be considered.

- At a minimum, utilities should address the following sources of uncertainty:
 - Electric utility plans should address load requirements, hydroelectric generation, plant forced outages, natural gas prices and electricity prices.
 - Natural gas utility plans should address demand (peak, swing and base-load), commodity supply and price, and transportation availability and price.
- Utilities should identify in the plan any additional sources of uncertainty.
- The analysis must recognize the historical variability of these factors as well as future scenarios.

Three, the primary goal must be the selection of a mix of resources with the best combination of expected costs and risks for the utility and its ratepayers.

- The planning horizon for analyzing resource choices should be at least 20 years and account for end effects. Utilities also must consider all costs with a reasonable likelihood of being included in rates over the long term, which extends beyond the planning horizon and the life of the resource.
- Utilities should use present value of revenue requirements (PVR) as the key cost metric. The plan should include analysis of current and estimated future costs for all long-lived resources such as power plants, gas storage facilities, and pipelines as well as short-lived resources such as gas supply and short-term power purchases.
- To address risk, the utility should at a minimum:

¹ Unless otherwise indicated, the guidelines apply to both electric and natural gas utilities.

² "Resource" is the general term used throughout this document for an option that meets customers' energy needs. For electric utilities, that includes power purchases, generating facilities and fuel, and transmission. For natural gas facilities, that includes gas supply purchases, transportation and storage facilities.

- Use two measures of PVRR risk: one that measures the variability of costs and another that measures the severity of bad outcomes.
- Discuss the proposed use of physical and financial hedging and their impact on costs and risks.
- Analyze the costs and benefits of resource flexibility (e.g., shorter duration, shorter lead-time, fixed vs. variable costs) in being able to adjust to different futures over the life of the portfolio analysis.
- Analyze the effect of potential compliance costs related to global warming on costs and risks for the resource portfolios under consideration. Include an imputed value for carbon dioxide emissions in the base case analysis, as well as analyze risk mitigation strategies.
- The utility should explain how its resource choices appropriately balance cost and risk.

Four, the plan must demonstrate that it is consistent with the long-run public interest as expressed in state of Oregon and federal energy policies.
(Issues 2a, 3, 4 and 5)

2. The utility must meet these procedural requirements:

- The public must be allowed significant involvement in the preparation of the plan.
 - Participation must include opportunities to contribute information and ideas as well as to receive information. It also must include the opportunity to make relevant inquiries of the utility formulating the plan.
- The utility should make public in the plan any information that is relevant to its resource evaluation and action plan. At the same time, confidential information must be protected.
 - Information that is confidential when specifically identified may be made publicly available in an aggregated format or through a blinding procedure.
 - The Commission allows information that is exempt from public disclosure under the Public Records Law – for example, trade secrets – to be treated confidentially. Parties may have access to confidential information in compliance with a protective order.
(Issue 6)
- The utility must provide to the public interim reports outlining its progress on development of the plan.
- The utility must provide a draft plan for public review and comment prior to filing a final plan with the Commission.

3. Plan filing, review and updates will follow this schedule:

- The utility must file an integrated resource plan every two years from the date the previous IRP was acknowledged. If the utility does not intend to take any significant resource action within two years, the utility may request a waiver.
- The utility should present the results of its filed plan at a Commission public meeting prior to the deadline for written public comment.
- Commission staff and parties should complete their comments and recommendations within six months of IRP filing.

- The Commission will consider acknowledgment of the filed plan at a public meeting. If the Commission finds that further work on a plan is needed, it will provide comments to the utility. This process should eventually lead to acknowledgment of the plan.
 - The Commission will provide direction in its acknowledgment order for any additional analyses or other actions that the utility should undertake in the next planning cycle.
 - Each year the utility must submit an update for its most recently acknowledged plan. The update is due on or before the IRP filing anniversary date. The update is an informational filing that provides an assessment of what has changed since acknowledgment that affects the action plan including such conditions as loads, expiration of resource contracts, supply-side and demand-side resource acquisitions and resource costs and any update on transmission availability. The update should explain any deviations from the acknowledged action plan such as actual conservation savings vs. targeted savings. The utility will summarize the update at a Commission public meeting.
(Issues 1a and 7, 2b, c and d)
 - The PUC may require utilities to provide additional updates to gauge progress toward meeting the goals of the IRP.
4. At a minimum, the plan should include the following elements:
- An explanation of how the utility met each of the Commission’s procedural requirements
 - An explanation of how the plan meets each of the Commission’s substantive requirements
 - A 20-year load forecast with an explanation of major assumptions
 - For electric utilities:
 - Determination of the levels of peaking capacity and energy capability expected for each year of the plan given existing resources
 - Identification of capacity and energy needed to bridge the gap between expected loads and resources
 - Modeling of all existing transmission rights, availability or capacity on existing lines, as well as future transmission additions associated with the resource portfolios tested
 - For natural gas utilities:
 - Determination of the peaking, swing and base-load gas supply and associated transportation and storage expected for each year of the plan given existing resources
 - Identification of gas supplies (peak, swing and base-load), transportation and storage needed to bridge the gap between expected loads and resources
 - Identification and estimated costs of all supply-side and demand-side resource options, taking into account anticipated advances in technology
 - Utilities should consider the full range of renewable resources available, not just wind
 - Utilities should not artificially impose caps on the amount of renewables a model considers
 - Analysis of measures the utility intends to take to provide reliable service, including cost-risk tradeoffs
 - Identification of key assumptions about the future — for example, fuel prices and environmental compliance costs — and alternative scenarios considered
 - Construction of a representative set of resource portfolios to test various fuel types, technologies, lead times, in-service dates, durations and locations

- Evaluation pitting the portfolios against possible economic, environmental and social circumstances
 - Results of testing and rank ordering of the portfolios by cost and risk metric and interpretation of those results
 - Analysis of the uncertainties associated with each portfolio evaluated
 - Selection of a portfolio that represents the best combination of cost and risk for the utility and ratepayers
 - Identification and explanation of any inconsistencies of the selected portfolio with state and federal energy policies and any barriers to implementation
 - An action plan with resource activities the utility intends to undertake over the next two to four years to acquire the identified resources, regardless of whether the activity was acknowledged in a previous IRP
5. The utility should specify the key attributes of each resource evaluated and each resource included in the action plan, including operating characteristics, resource type, fuel and sources if applicable, technology, in-service date, duration and general location – system-wide or delivered to a specific portion of the system. (Issue 9)
 6. Portfolio analysis should include costs to the utility for the fuel transportation and electric transmission required for each resource being considered. In addition, utilities should consider fuel transportation and electric transmission system development as resource options. Such analysis should consider the value of such development for additional short-term purchases, additional sales, accessing less costly resources in remote locations, and acquiring alternative fuel supplies. Potential savings in distribution system costs should be identified in the plan for resources that can significantly reduce such costs, including conservation, demand response, combined heat and power facilities, customer standby generation, solar resources, liquefied natural gas and gas storage. (Issue 11a)
 7. Utilities must consider the availability of public purpose funds in assessing the optimal level of new renewable resources to acquire. They also must demonstrate how their action plan is affected by such funding and explain what steps they are taking to secure public purpose funds for planned renewable resources if there are above-market costs.

All utilities should fully analyze conservation resources in portfolio modeling on par with supply-side resources, accounting for the cost and risk reduction benefits of conservation resources under all futures evaluated. Unless a third party funds and administers conservation programs, the utility should include in the action plan all least-cost/least-risk conservation resources for meeting projected load growth, specifying annual savings targets.

A conservation potential study should be conducted periodically for each utility's entire service area. Along with any updates of energy usage trends and conservation costs, the study should form the basis for the 20-year conservation supply curves the utility uses in portfolio modeling.

If the Energy Trust or other entity acquires conservation on behalf of the utility's Oregon customers, the utility should incorporate the entity's conservation projections in resource

planning. Further, both should work cooperatively on the 20-year conservation assessments for the utility's service area, as well as joint load management opportunities. Such assessments should incorporate the utility's load research data as well as its knowledge of energy usage trends by customer type.

(Issues 12 and 13)

8. Plans should evaluate demand response resources on par with other options for meeting energy, capacity, and transmission needs (for electric utilities) or gas supply and transportation needs (for natural gas utilities). Rate design should be treated as a potential demand response resource. The analysis of demand response resources also should account for potential distribution system savings in load growth areas. Utilities should develop supply curves for a wide variety of demand response resources spanning a wide range of costs. The utilities should use these supply curves to evaluate demand response in the risk modeling of portfolios. (Issue 14)
9. Utilities ~~should~~ must include in their base-case analyses the regulatory compliance costs they expect for carbon dioxide (CO₂) emissions.³ Utilities also should analyze the range of potential CO₂ regulatory costs in Order No. 93-695, from zero to \$40 (~~1990~~1990\$). In addition, utilities should perform sensitivity analyses on a range of cost adders for nitrogen oxides, sulfur oxides and mercury, if applicable, including those based on market-based cap-and-trade programs as well as on projected changes in state and federal requirements or their implementation. Compliance cost projections should consider damages from pollution and estimates of mitigation costs. Sensitivity analyses are no longer required for total suspended particulates. (Issue 15)
10. The utility's load-resource balance should reflect customer loads to be served by an alternative electricity or natural gas supplier over the planning horizon. (Issue 17)
11. Multi-state utilities should plan their generation and transmission systems, or gas supply and delivery, on an integrated system basis that achieves a least-cost/least-risk resource portfolio for all their retail customers. (Issue 8)
12. Potential ratemaking treatment should not affect the selection of the least-cost/least-risk portfolio. The utility should advise the Commission during the planning process if it does not have reasonable incentives to acquire a resource that is part of that portfolio. (Issues 1d and 22)
13. To address reliability:
 - Electric utilities should analyze planning margin within the risk modeling of the actual portfolios being considered. The analysis should include varying loads, forced outages, hydro availability, and fuel and market prices and should allow for market purchases within transmission constraints. Loss of load probability and expected unserved energy should be evaluated by year and by future. Each utility's IRP analysis should take note of

³ A subsequent proceeding will determine the precise range of values for carbon dioxide to be used in base case analysis.

regional adequacy efforts and what other utilities are planning in order to properly measure their own risk.

- Natural gas utilities should analyze on an integrated basis gas supply, transportation, and storage, along with demand-side resources, to reliably meet peak, swing and base-load system requirements.
- The plan should demonstrate that the utility's chosen portfolio achieves its stated reliability, cost and risk objectives. (Issue 21)

14. Electric utilities should evaluate distributed generation technologies on par with other supply-side resources, including comparative costs for plant capital expenditures, transmission and environmental compliance. Electric utilities also should consider and where possible quantify the additional benefits of distributed generation, such as potential distribution system cost savings within load growth areas. (Issue 20)

15. The utility should identify in the action plan its acquisition strategy for each resource. Gas utilities should describe in the IRP their proposed bidding process for gas supply and transportation, whether formal or informal. Electric utilities should identify those resources that will be acquired through competitive bidding and indicate if they plan to have a utility resource considered in that process, whether utility-built or built by a third party and transferred to utility ownership. The utility should also explain the "pros and cons" of this decision in its IRP analysis. For all utilities, the competitive bidding process should follow IRP acknowledgment. The cost and risk decision criteria for selecting resources in the bidding process should be consistent with the decision criteria for selecting resources in the acknowledged IRP. (Issues 1c and 16)

COMBINED CERTIFICATE OF SERVICE

UM 1182/UM 1056

I hereby certify that I served the foregoing **REPLY COMMENTS OF CITIZENS' UTILITY BOARD, RENEWABLE NORTHWEST PROJECT AND THE NW ENERGY COALITION** on the following persons on September 30, 2005, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

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- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

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lwolv@tds.net

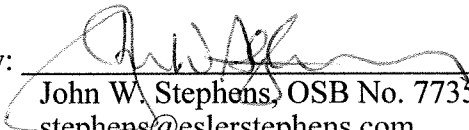
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- by express mail
- by e-mail

Paul M. Wrigley
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- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

DATED this 30th day of September, 2005.

ESLER STEPHENS & BUCKLEY

By: 
John W. Stephens, OSB No. 77358
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Of Attorneys for Renewable Northwest
Project

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