

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 **OF OREGON**

3 UM 1755

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY,

7 2017-2021 Renewable Portfolio Standard
8 Implementation Plan.

UNOPPOSED MOTION FOR COMMISSION
ORDER ACKNOWLEDGING PGE'S
IMPLEMENTATION PLAN WITH CONDITIONS
AND CLOSING DOCKET

9 Pursuant to OAR 860-001-0390, Staff of the Public Utility Commission of Oregon (Staff)
10 requests the Commission to immediately acknowledge Portland General Electric's (PGE or
11 Company) 2016 Renewable Portfolio Implementation Plan (RPIP) with conditions as more fully
12 described below. Staff is authorized to state that all active parties to this docket either support
13 this Motion or do not oppose it.

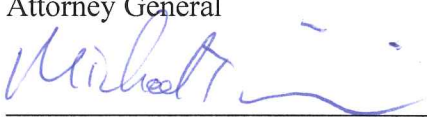
14 PGE filed its 2016 RPIP on December 31, 2015. ORS 469A.075(3) requires the
15 Commission to acknowledge the RPIP "no later than six months after the plan is filed with the
16 Commission. The Commission may acknowledge the plan subject to conditions specified by the
17 commission." While acknowledging that PGE filed its Supplemental Attachment A, which
18 contained information about SB 1547 and its potential impacts upon the RPIP, Staff determined
19 that a more complete, thorough analysis was required. *See generally* Staff's Supplemental
20 Comments. At its core, this Motion is presented in order to allow sufficient time for PGE to
21 provide further information about the impact of Senate Bill (SB) 1547 upon its RPIP.

22 After discussion, PGE agreed to provide such an analysis but the Company also stated it
23 would take several months to complete. PGE agreed to Staff's request that it use its "best
24 efforts" to submit as complete, thorough analysis as possible by July 15, 2016. Staff has
25 prepared Attachment A, included with this Motion, setting forth the topics it expects PGE's
26 additional analysis will address.

1 After discussion, the parties agree that, in light of the time constraints set by ORS
2 469A.075(3), the best procedural path is for the Commission to acknowledge PGE's 2016 RPIP
3 with conditions. The conditions would include the following:

4 The Commission acknowledges PGE's 2016 RPIP accompanied with an Order finding
5 that the RPIP is insufficient in light of the passage of SB 1547. The Commission would further
6 require PGE to file a new RPIP no later than July 15, 2016. The July RPIP would be considered
7 an entirely new filing. The July RPIP filing would include a complete analysis of SB 1547
8 which addresses, at a minimum, the matters set forth in Attachment A to this Motion. In its
9 Order, the Commission would then close Docket UM 1755. The Commission's Order would not
10 address or represent a decision on any of the issues raised by Staff and the intervenors in their
11 comments submitted in UM 1755. Those issues would be considered preserved for further
12 resolution in the RPIP proceeding that commences with PGE's July 15 RPIP filing.

13 DATED this 20th day of April, 2016.

14 Respectfully submitted,
15 ELLEN F. ROSENBLUM
16 Attorney General
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18 Michael T. Weirich, #82425
19 Assistant Attorney General
20 Of Attorneys for Staff of the Public Utility
21 Commission of Oregon
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ATTACHMENT A

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In addition to a providing quantitative analysis to meet 2016 Renewable Portfolio Implementation Plan (RPIP) requirements, PGE should provide a complete and thorough narrative describing its plan to satisfy the Renewable Portfolio Standard (RPS) compliance requirements of SB 1547 from 2017 through 2040.

At a minimum, the July RPIP should include:

1. A discussion of the differences between SB 838 (i.e. ORS 469A.005 to ORS 469A.210) and SB 1547, with supporting analysis demonstrating the impacts of those differences on utility planning and operations decisions 2017-2040.
2. An analysis of these aspects of SB 1547: its elimination of the “first in, first out” requirement, its creation of unlimited REC life status for the first 5 years of new resources acquired between 2016-2022, its shortening of the standard Renewable Energy Credit (REC) life, and the steep compliance rate increase between 2025 and 2030. In particular, the analysis should address how these aspects of SB 1547 affect how the utility plans to optimize the mix of compliance RECs for least cost and lowest risk.
3. A discussion of how the timing of new renewable resource acquisitions impact long term cost of compliance with the RPS to ratepayers with supporting analysis demonstrating these differences in timing. Under what conditions does the least cost/lowest risk strategy to satisfy the RPS compliance requirements of SB 1547 from 2017 through 2040 lead to new resource acquisition prior to a physical need and how will the utility evaluate this decision? PGE should provide a “tipping-point” analysis that depicts when physical resource acquisition is more cost effective than buying unbundled RECs.
4. A discussion of how key market assumptions impact the relative range of risk and uncertainty related to cost over the compliance horizon. Load growth, hydroelectric

1 generation, project cost, natural gas and electricity market prices are some examples
2 of key assumptions to be assessed in this discussion.

- 3 5. Throughout the analysis, PGE should provide methodologies and assumptions used to
4 support the RPIP along with a narrative describing the reasoning behind the selection
5 of those methodologies and assumptions.

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