



August 2, 2021

***Via Electronic Filing***

Public Utility Commission of Oregon  
 Attention: Filing Center  
 P.O. Box 1088  
 Salem, OR 97308-1088

Re: UM 1953 Portland General Electric Filing Green Tariff Filing – IRP Sensitivity Analysis

Dear Filing Center:

As noted in Commission Order No. 21-091, PGE committed to provide IRP sensitivity analysis before expanding its Green Future Impact program from 300 MW to 500 MW. PGE stated this during oral argument and memorialized in its IRP update, filed January 29, 2021:

PGE has committed to providing sensitivity analysis of a proposed expansion of the GEAR program beyond the original 300 MW in the next IRP and to provide updated sensitivity analysis with a tariff filing.<sup>1</sup>

The Commission determined that PGE’s GEAR design at the proposed size of 500 MW nameplate capacity of GEAR resources sufficiently mitigates concerns about whether the IRP crediting methodology adequately protects non-participating customers.<sup>2</sup> Consistent with Commission’s requirement set forth in Order No. 21-091, PGE submits the below IRP sensitivity analysis of PGE’s updated energy and capacity assessment based on the inclusion of the 300 MW from the first tranche of the GEAR and the extension of PGE’s purchase of the Confederated Tribes of Warm Springs owned portions of the Pelton and Round Butte Project.

	Installed Capacity (MW)	Capacity Contribution	Generation (MWa)*	2030 Avoided RPS (MWa)
GEAR Phase 2	200	25-67	57-82	0

*\*Capacity contribution and generation vary depending on the resource type. PGE analyzed both an Oregon solar resource with an approximately 28.5% capacity factor and a Gorge wind resource with an approximately 40.8% capacity factor.*

**Energy Assessment**

The table below is an update to Table 5 from PGE’s IRP update and provides a summary of PGE’s 2025 net market position, in MWa, prior to the addition of the 200 MW from GEAR Phase 2. Positive values represent PGE being a net market purchaser. As noted above, the addition of the 200MW from GEAR Phase 2 reduces PGE’s net market purchaser position by 57-82 MWa. The addition of the GEAR Phase 2 does not materially impact PGE’s energy assessment as PGE remains

<sup>1</sup> Portland General Electric’s Integrated Resource Plan LC 73, 2019 Plan Update; <https://edocs.puc.state.or.us/efdocs/HAH/lc73hah13049.pdf> at 22.

<sup>2</sup> Order 21-091 at 15.

a net market purchaser given that the energy position exceeds the amount of energy from the GEAR Phase 2 resource in all cases.

	11/19 Needs Assessment Update	IRP Update	IPR Update - New Baseline*	Net of GEAR Contribution
Reference Case	527	595	472	390-415
10th Percentile	285	428	305	223-248
90th Percentile	848	887	764	682-707

*\*New Baseline is constructed from the IRP update with the addition of the second resource from GEAR Phase 1 (138MW of solar) and the extension of PGE’s purchase of 100% of the output from the Pelton and Round Butte Project.*

**Capacity Assessment**

The table below is an update to PGE’s 2025 capacity need assessment based on the IRP Update – New Baseline and reflecting the addition of 200 MW of either solar or wind as part of GEAR Phase 2. The resulting contribution for the inclusion of GEAR Phase 2 ranges from 25 MW to 67 MW of capacity depending on the resource type. The solar resource is assumed to be Oregon solar, based on GEAR Phase 1, and the wind resource is the Gorge wind proxy resource from the 2019 IRP. In either case, PGE’s capacity need is reduced by the 200 MW GEAR resource, but remains above 200 MW in 2025.

	Capacity Need (MW)	Capacity Contribution (MW)
IRP Update - New Baseline*	275	
Additional 200MW Solar	250	25
Additional 200MW Wind	208	67

*\*New Baseline is constructed from the IRP update with the addition of the second resource from GEAR Phase 1 (138MW of solar) and the extension of PGE’s purchase of 100% of the output from the Pelton and Round Butte Project.*

PGE appreciates Staff’s consideration of this analysis. Our UM 1953 compliance filing, Advice 21-11 is pending consideration by the Commission, planned for the August 10, 2021 meeting. Optimally, we’d ask that this analysis be accepted with our compliance filing but understand the need to allow time for review and questions, and thus, a separate process should that be deemed necessary. We look forward to working with Staff and stakeholders on any questions that arise. Please contact Karla Wenzel with questions.

In closing, we note that we will be following up on the Phase 2 administrative fee which the Commission declined to authorize in its order, due to insufficient vetting and the need to review the underlying methodology and justify the fee. The administrative fee has been and is an important consideration in Phase 1 to prevent cost shifting and is a means to charge the participants the cost of administering the program.

Sincerely,

*/s/ Karla Wenzel*

Karla Wenzel  
 Manager, Regulatory Policy and Strategy

Cc: UM 1953 Service List  
 LC 73 Service List