

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 358

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Advice No. 19-02, New Load Direct Access
Program.

BENCH REQUEST

The following bench request seeks to achieve two objectives: (1) greater clarity on the problem to be solved or addressed through Portland General Electric's (PGE) proposed resource adequacy charge (RAD); and (2) better understanding of the range of solutions to that problem.

1. Is the sole justification for the proposed RAD the need to procure capacity to provide emergency service and keep the balancing authority (BA) in balance to avoid curtailment when market purchases are unavailable at any price? Or does PGE assert that, when market purchases are available, the current emergency service tariff fails to adequately recover costs such that new load direct access (NLDA) customers will be subsidized without the RAD?
 - a. If the latter, please articulate the rationale with specificity.
 - b. If the former, please confirm that, *if* PGE were legally and operationally permitted to curtail NLDA load before cost-of-service load, such differential curtailment would eliminate the need for the RAD?
2. What is PGE's capacity procurement plan?
 - a. When would PGE act to procure capacity?
 - b. Would PGE consider all capacity products? (e.g., new physical, existing bilateral, demand response, distributed emergency dispatch, etc.)
 - c. What duration of capacity product would PGE consider?
 - d. When would NLDA customers be charged for capacity products?
 - e. Assuming the Commission approved the RAD as an interim measure, but continued investigation to determine the appropriate level of charges and alternatives to the RAD, how would any charges collected in an interim period be used?

3. Is a differential curtailment protocol for NLDA customers, even if operationally viable (e.g., because interconnection equipment and voltage levels are appropriate), nonetheless not possible without changes to PGE's Rule N Curtailment Plan and/or other legal, regulatory or tariff requirements to maintain a non-discriminatory approach to load curtailment?
 - a. If such a protocol is not possible, please identify all relevant legal and regulatory barriers.
 - b. If such a protocol is possible, please describe a differential curtailment protocol and procedure that PGE would have authority to implement.

4. How would PGE design a demand response or curtailment program for NLDA customers that is specifically tailored to the problems or specific events that PGE seeks to address through the RAD?
 - a. Would a demand response or curtailment requirement, with conditions similar to the program proposed by Calpine Energy Solutions, LLC (Calpine) in Calpine/300, Higgins/2-3, address the resource adequacy events that the RAD is intended to address?
 - b. When would PGE be prepared to propose a custom demand response or curtailment solution tailored to the specific events the RAD is intended to address?
 - c. What parameters would such a custom program require?

5. PGE's RAD proposal would require all NLDA customers to pay the cost of capacity to match 100 percent of monthly peak demand. That capacity requirement is justified primarily by reference to extreme conditions of zero forward capacity contribution by ESS supply combined with a regional market shortfall, and the capacity procured through the RAD is not asserted to be used to benefit NLDA customers at other times.
 - a. Does PGE's RAD solution assume ESS non-performance during 100 percent of peak demand events?
 - b. Please address the characterization at Calpine/100, Higgins/7 of the RAD as "a very expensive 'insurance policy.'"
 - c. If the Commission were to accept Calpine's characterization of the RAD as an "insurance policy," for purposes of adopting an interim measure, please address whether it would be more reasonable to calculate the RAD based on a lower percentage of an NLDA customer's peak load, such as the percentage associated with a commonly used planning reserve margin (like the 16 percent used in the 2019 PNUCC Northwest Regional Forecast).

Responses are due by close of business, October 4, 2019. Replies are due by close of business, October 11, 2019. PGE is requested to respond to all questions. Other parties are invited but not required to respond to any or all questions. All parties are invited to address these questions at the October 17, 2019 hearing scheduled in this docket.

Dated this 20th day of September, 2019, at Salem, Oregon.



on behalf of

Nolan Moser
Chief Administrative Law Judge