



December 16, 2021

Via Electronic Filing

RE: Portland General Electric's Flexible Load Multi-Year Plan

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

TeMix Incorporated (TeMix) looks to submit the following comments regarding Portland General Electric's (PGE) compliance filing based on Order 21-158 – better known as the Flexible Load Multi-Year Plan (FLMYP). TeMix thanks PGE for the effort to-date, and the PUC Commission and Staff for the opportunity to submit remarks.

TeMix recognizes the challenge PGE has in attempting to weave a comprehensive vision across multiple filings; especially when each of the other filings are heavily nuanced variations of the same goal; however, after examining the filed FLMYP, TeMix urges the Commission to instruct PGE to amend their suggested activities to include activities that satisfies the entire decision developed under UM 2141, and not simply provide status-quo supply-side activities which do not meet the complete intent within UM 2141.

As the Chief ALJ pointed to in his order:¹

“Staff recommended that PGE include plans to facilitate growth in ***dispatchable storage, residential direct load control, residential pricing, and EV direct load control*** within the action plan timeframe. Staff further suggested that the summary should provide a consolidated view of the ***full suite*** of PGE's flexible load activities and describe the feedback loop with Company's IRP process.

In its current form, PGE's plan falls well short of meeting these elements identified and opined upon by the Chief ALJ's in Order 21-158. TeMix agrees with PGE that this first filing falls between its 2019 IRP and other closely related filings; namely DSP², not to mention other recently legislated actions that demand consideration in this plan³; however, TeMix points to the fact that the FLMYP filing was after those other

¹ Order 21-158, filed May 18, 2021, Appendix A pg. 2 – bolded and italicized key attributes.

² UM 2005

³ HB 2021

activities were well along in their development cycle providing PGE ample exposure to the content which should have resulted in sufficient lead time to include these other directives into this first plan. If PGE would have addressed these additional considerations into its FLMYP this would have shown stakeholders how PGE fully intends to capture the entire directive in UM 2141.

Clearly demonstrated by Oregon's legislative body, its Public Utility Commission (PUC) and PUC Staff, the goal of recent directives is signaling to stakeholders and the public, alike, that Oregon wants its electrical power system (EPS) to embrace solutions that a far from status-quo.

In this filing, however, PGE omitted this trend and chose to dedicate substantial amount of the plan discussing activities that have been going on well in advance of UM 2141 and these other related actions. Having actively participated in many of the recent workshops, technical working groups and web-calls related to such matters surrounding the FLP, TeMix finds this position to be confusing and highly counter-intuitive to the numerous discussions thereof. Additionally, TeMix finds this methodology places undue and unreasonable latency in Oregon and its ratepayers achieving the benefits set forth from such leadership.

To provide an example, you must look no further than this past legislative session, and the conclusions described in HB 2021. The intent of our Legislation could not have been clearer, and the signing of the bill provides full authority for PGE, the PUC, and other stakeholders the ability to act now, not tomorrow, to realize the benefits of meeting clean energy goals.

Specifically, I bring your attention to Section 20⁴. This section describes, extensively, the authority local governments and Oregon utilities have in filing new tariffs that reflect renewable and non-emitting energy goals to serve retail electricity consumers within their respective service territories.

In the December 2020 FLP workshop as well as other, on-going, recorded, proceedings⁵, TeMix has strongly advocate for this precise approach to be adopted, and even after re-encouraged by the ALJ, for PGE to omit this activity from its FLMYP raises cause for consideration that PGE is continuing down a path that resembles status-quo and not the intent of the legislation or the various PUC directives. Moreover, without trying to present activities, in the plan, that incorporates HB 2021 measures, TeMix finds it difficult to translate what is presented in PGE's filing as being a *full suite* - of activities –.

⁴ See HB 2021

⁵ See TeMix submitted comments in UM 2005



As TeMix has stated in this and other docket related proceedings, addressing retail market structures and tariff design may not have been deeply explored in past Oregon dockets but, that must not preclude us from considering this solution now. Furthermore, TeMix has encouraged PGE, repeatably, to take advantage of learnings, on the matter, from other jurisdictions⁶. This examination will not only fast-track the receipt of critical content of the application, but it will also streamline the discussion and necessitate evaluating only lessons learned and best practices, which in return, will only speed the process and allow PGE to tailored the demonstration for Oregon's EPS and its ratepayers.

Suggested Considerations:

TeMix encourages and supports PGE taking the initiative or the Commission instructing PGE to revise Chapter 4 to including a demonstration that showcases the value of incorporating new retail market and tariff design, or at minimum, holding an educational workshop on how to create new retail markets and supportive tariffs. This would be one angle to assist PGE meet the full intent of UM 2141.

Furthermore, at the instruction of the PUC, if PGE moves forward with a workshop, TeMix encourages and supports the transparency shown in this and other proceedings should remain here. Specifically, PGE should establish defined outcomes for the educational workshop (e.g., how they plan on incorporating stakeholders' suggests or incorporate a demonstration), so the goal/outcome of a workshop, is not a fruitless activity but, will lead to action in 2022 and beyond.

Respectfully submitted,

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⁶ See the CPUC decision to demonstrate **New Dynamic Rate Plans** in response to Gov. Newsom's 2020 Emergency Proclamation – *Ensuring Reliability Under Extreme Weather Events*. <https://www.cpuc.ca.gov/news-and-updates/all-news/cpuc-ensures-electricity-reliability-during-extreme-weather-for-summers-2022-and-2023>