



Oregon Citizens' Utility Board

610 SW Broadway, Suite 400
Portland, OR 97205

(503) 227-1984
www.oregoncub.org

November 18, 2021

Via electronic filing

Scott Gibbens
Public Utility Commission of Oregon
201 High St. SE
Salem, OR 97301

Re: *UM 2143 – Comments on Staff's Process Proposal and RA Solution Straw Proposal*

Dear Mr. Gibbens:

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to provide comments on Staff of the Public Utility Commission of Oregon's (Staff) process proposal and resource adequacy (RA) solution straw proposal in the above-referenced proceeding. To reaffirm our position taken at the October 27, 2021 workshop, CUB continues to support Staff's proposed process for the UM 2143 RA proceeding. In addition, CUB supports Staff's Straw Proposal, Interim Solution, and Long-Term solution articulated in the October 15, 2021 memorandum. CUB favors the main proposal over the alternative listed in the memorandum.

CUB continues to believe it is important to clearly identify the scope of the anticipated capacity shortfall the region is facing before identifying steps and actions to mitigate any forthcoming capacity deficit. Staff's proposal for Load Responsible Entities (LREs) to make informational filings detailing their load/resource balance through 2027 helps achieve this purpose, and will hopefully provide a solid, fact-based foundation for the rest of this proceeding to rely on. In determining the extent of any anticipated capacity shortfall, it is also important to determine the time needed for LREs to target an acquire new capacity resources. This, in tandem with the informational filings, will help create a common understanding of which near and long-term actions need to be taken to ensure reliability in the state. In addition, it will provide insight into which LREs are currently paying for capacity, and to what extent LREs may or may not be reliant on each other to procure capacity under the current paradigm. This proceeding should examine whether, and to what extent, capacity subsidization is occurring between Oregon LREs.

In addition, Staff's proposal provides time for the Western Resource Adequacy Program (WRAP) to gain operational experience. The Commission has a core, non-delegable responsibility to ensure reliable service for Oregon's investor-owned utility customers. The Commission cannot delegate that responsibility to the WRAP absent a thorough investigation and subsequent finding that the WRAP will help result in reliable service. CUB envisions that this proceeding will investigate that issue, and will also investigate whether it is in the public interest for Oregon LREs to participate in the WRAP. While the WRAP is currently formatted

as a voluntary program with binding commitments once operational, the Commission has the authority to make WRAP participation mandatory for LREs that operate under its regulatory umbrella. CUB looks forward to that discussion in this proceeding.

Finally, this proceeding should seek to build on lessons learned from the WRAP process, and should not spend significant time duplicating efforts undertaken at the WRAP that prove to be well-functioning. Instead, UM 2143 should seek to identify gaps in the WRAP's capacity framework that may be ameliorated by actions taken at the state level.

Once again, CUB appreciates Staff's hard and thoughtful work in creating a sound straw proposal to guide this important proceeding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael P. Goetz".

Michael P. Goetz
Oregon State Bar No. 141465
General Counsel
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. (503) 227-1984
C. (630) 347-5053
E. mike@oregoncub.org