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November 1, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
Application for Approval of an Independent Evaluator for 2021 All-Source
Request for Proposals.
Docket No. UM 2166

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Comments on Portland General Electric Company's Draft 2021 All-Source Request for Proposals in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2166

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	COMMENTS OF THE ALLIANCE OF
COMPANY,)	WESTERN ENERGY CONSUMERS
)	
2021 All-Source Request for Proposals.)	
_____)	

The Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to file comments on Portland General Electric Company’s (“PGE” or “Company”) 2021 Final Draft All-Source Request for Proposals (“Draft RFP”). AWEC recommends that the Commission decline to approve two components of PGE’s Draft RFP.

First, while the Company identifies procurement of approximately 150 aMW of renewable resources and 375 MW of dispatchable capacity, consistent with its 2019 IRP as updated for current capacity needs, it goes further to provide that “PGE will explore procuring approximately 65 MWa of additional renewable resources beyond the 150 MWa target, positioning PGE to have procured approximately one third of its forecasted renewable needs to achieve the HB 2021 2030 goal.”^{1/}

This additional procurement “explor[ation]” is devoid of any context or analysis. PGE provides no basis for reaching one-third of the HB 2021 2030 goal in this RFP as opposed to any other amount. It offers no explanation of what factors will lead it to procure or decline to procure these additional resources. It does not justify why it appears to limit this additional

^{1/} Draft RFP at 4.

procurement to renewable resources rather than any non-emitting resource (which would be equally compliant with HB 2021). It has not even demonstrated that an additional 65 aMW will indeed equate to one-third of its HB 2021 2030 target.

Rather, it appears that PGE has simply taken Staff's recommendation to "run an alternative procurement scenario for the RFP that would have PGE procure one-third of the estimated renewables need to meet the 2030 HB 2021 target" and used it as a reason to include this additional procurement in the RFP.^{2/} Staff's recommendation, however, was made with the idea that it "would provide data to support discussion of whether PGE should procure more in the current RFP."^{3/} That data has not been provided, nor has a discussion occurred, to AWEC's knowledge.

In its previous two IRPs, PGE has performed a glide path analysis to justify early procurement of renewable resources to meet Oregon's renewable portfolio standard. By contrast, here PGE seems to have arbitrarily picked 65 additional aMW without any underlying analysis. Under OAR 860-089-0250(3)(g), if the Draft RFP diverges from PGE's acknowledged IRP, PGE must provide "good cause" for the "subsequently identified need or change in circumstances." Here, PGE has just waved its hands and pointed to HB 2021.

Second, PGE requires that "[a]ll resources (dispatchable or renewable) must be online by the end of 2024, with the exception of long-lead-time pumped hydro resources."^{4/} While AWEC acknowledges that the Commission approved of PGE's "accommodation for long-lead time

^{2/} Order No. 21-320, Appen. A at 12 (Oct. 6, 2021)

^{3/} Id.

^{4/} Draft RFP at 4.

resources” in its IRP,^{5/} the Company should still offer a justification for procuring these resources in the first place. This RFP is designed to “procure renewable energy and non-emitting dispatchable resources to meet identified 2025 capacity needs.”^{6/} If PGE can select pumped storage that is online after 2025, then what need is this resource fulfilling and at what cost and benefit to customers? Presumably pumped storage can also assist PGE in meeting its HB 2021 goals. Rather than pursuing an additional 65 aMW of renewables in this RFP, could the same goals be achieved by acquiring pumped hydro at lower cost and risk to customers? It is unclear because, again, PGE has done no analysis.

Ultimately, there is no coherent plan underlying this RFP that demonstrates what PGE is seeking is in customers’ short- and long-term interests. The original basis for this RFP was to meet a projected capacity need in the mid-2020s. While that remains a justification for the RFP, HB 2021 has, arguably, changed the circumstances since the 2019 IRP. That, however, argues for more robust analysis to justify PGE’s resource acquisitions across the board. Instead, PGE has stuck to what was acknowledged in the 2019 IRP and added on potential additional resources as if another layer of frosting will disguise a half-baked cake.

To be clear, AWEC does not oppose PGE acquiring whatever it feels is appropriate. The Company will have the opportunity to demonstrate the prudence of its decision in the next general rate case or renewable adjustment clause filing. The question before the Commission, though, is whether to approve the Draft RFP PGE has filed. Without an understanding of whether the RFP is likely to result in a least-cost/least-risk procurement for customers, based on

^{5/} Docket No. LC 73, Order No. 20-152 at 25-26 (May 6, 2020).
^{6/} Draft RFP at 4.

something more than PGE's blanket statements, the Commission should not take an affirmative position on the RFP.

Dated this 1st day of November, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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