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August 27, 2021

Via Electronic Filing

Oregon Public Utility Commission
Attn: Filing Center
201 High Street Southeast Suite 100
Post Office Box 1088
Salem, Oregon 97301

Re: UM 2166 – PGE 2021 All-Source Request for Proposals (RFP)

Dear Filing Center:

During the August 9, 2021 PGE hosted scoring and modeling methodology workshop, PGE invited interested bidders to send any questions or comments to PGE's RFP email address (rfp@pgn.com).

As there is not yet an RFP website in which to post these submissions, PGE is enclosing for filing in the above captioned docket a list of anonymized questions and comments PGE received from interested bidders as of August 25, 2021. It is PGE's intention to reply to these comments within our September 13, 2021 comments for Docket UM 2166.

Sincerely,

/s/ Erin E. Apperson

Erin E. Apperson
Assistant General Counsel II

EEA:np
Enclosure

Methodology Proposal Section	Referenced RFP Design Text	Bidder Question or Comment
Section 6.4 Price Scoring/Page 19/Bid Cost Determination	For bids that contemplate a utility ownership structure, a bid's fixed costs will include total depreciation, salvage, return, income taxes, deferred income taxes, deferred tax asset costs, property taxes, fixed operating and maintenance costs (O&M), wheeling charges, and ancillary services less any tax credit benefits.	For energy storage assets, it would be beneficial to include specific information on how new technology will be treated (i.e., depreciation). We are consistently seeing a 20-year life for standalone battery storage. Energy storage assets come with O&M contracts and guarantees that provide useful information as to what the guaranteed life of the facility is and should be leveraged accordingly.
Table 2/Page 15/Site Control	Bidders must support the bid by demonstrating dependable site control, for both the location of the resource and any gen-tie path that is required.	Consider clarifying if this requirement applies to all applicable property required for the facility – including property for mitigation, noise easements, etc.
Table 2/Page 17/Transmission	Transmission (Renewable Resources) - To qualify for this RFP, a bidder must have eligible transmission service described above that is equivalent to at least 80 percent of the facility's interconnection limit. The eligible transmission service must originate at the POR/POI and provide delivery to one of the acceptable points of delivery, defined above, prior to project COD. Bidders relying on BPA for transmission service are required to have either: 1) previously granted eligible transmission service, or 2) an eligible and active OASIS status Transmission Service Request (TSR)	Scoring should allow for redirects of existing long-term firm transmission.

	participating in the BPA TSR Study and Expansion Process.	
Table 2/Page 17/Transmission	[None]	Please describe how Montana bids will be evaluated for Transmission. Specifically, will there be an assumption on when CTS transmission will become available to those projects?
Table 2/Page 17/Transmission	Transmission (Dispatch Resources) - To qualify for this RFP as a dispatchable resource, a bidder must have long term firm transmission rights for 100 percent of the facility's interconnection limit. The long-term firm transmission service must originate at the resource POR/POI and provide delivery to one of the acceptable points of delivery, defined above, prior to project COD.	On-system resources will not be able to request transmission service under the OATT (network service) as the developer will not be a network customer or the resource will not meet the OATT/FERC requirements for achieving a network designation status until contract negotiations. Scoring should clarify on/off-system requirements for transmission, as well as interconnection.
Table 2/Page 18/Accepted equipment manufacturers for BTA and APA structures	All major equipment manufacturers must be PGE preferred vendors.	Please provide a list of approved vendors.
Section 6.4 Price Scoring/Page 19/Bid Cost Determination	For consistency PGE intends to assess all bids the BPA reserves rate. Renewable resources will be assessed BPA's variable energy resource balancing services, and dispatchable resources will be assessed dispatchable energy resource balancing services.	Please clarify if the RFP intends to apply the ancillary services costs (e.g. contingency reserves and integration/balancing reserves) from the applicable host Balancing Authority Area (BAA) or if the RFP will apply BPA's reserve costs regardless of the host BAA.

Exhibit A/Page 30	Eagle surveys and take estimates completed using USFWS-approved protocols	USFWS protocol eagle use surveys take two years to complete, and at the latest should be completed prior to the beginning of construction; a preliminary estimate can be provided with the qualifier that surveys are still occurring.
Exhibit A/Page 30	State/local sensitive species surveys completed	While site-wide analysis and habitat review should be done for sensitive species, final field surveys may not be completed until micro siting of facilities has been completed, which would generally not be until a notice to proceed has been given (i.e. post bid selection and negotiation).
Exhibit A/Page 30	State and local siting permit (e.g., site certificate, conditional use permit)	<p>1) With a COD at the end of 2023, construction is likely to start late 2022 or early 2023. State and local siting permits may not be obtained until six-months prior to construction. Depending on timing of when the final shortlist is completed, this may need to be considered.</p> <p>2) Standalone storage does not require a site certificate (however combined wind plus storage, solar plus storage, and wind plus solar plus storage do require site certificate in Oregon). Requiring a local jurisdictional siting permit or Conditional Use Permit (CUP) at final shortlist is too early in the process for a standalone energy storage project with a COD of 12/31/2024. These permits will typically have timing requirements for start of construction that could expire if they are granted too early. The shorter development timeline for a standalone storage project as compared to a renewable project, such as wind or solar, makes</p>

		this requirement for energy storage projects overly restrictive.
Exhibit A/Page 30	FCC permit	Note that FCC permits may be applicable but may not be able to be obtained or are not required until after completion of construction depending on what the permit is to be used for.
Section 6.5 Non-Price Scoring/Page 26/Online Date Certainty	Table 7 Point Allocation	<p>A COD in 2023 is challenging for a standalone storage project, even in advanced stages of development, under the current proposed timeline for the RFP. The earliest a NTP could be issued is Q2 2022. There currently are supply chain constraints to get necessary parts for BESS 2022 and 2023 that make it unlikely that standalone storage could be constructed by the end of 2023. We recommend the RFP push out the COD point allocation one year, with 10 points for a 12/31/2024 COD and eight points for a 12/31/2025 COD. This will still allow the RFP to meet PGE's forecasted capacity needs in 2025.</p> <p>Based on the current proposed point allocation under Table 7, it is also unclear how many points are awarded for a project with a COD between 1/1/2025 and 12/31/2025.</p>