



Portland General Electric Company
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April 1, 2022

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, Southeast
Post Office Box 1088
Salem, Oregon 97308-1088

**RE: UM 2166 – Portland General Electric 2021 All-Source Request for Proposals:
ELCC Compliance Filing**

Portland General Electric Company (PGE) submits this filing pursuant to Order No. 21-460, which instructs the company to provide the effective load carrying capacity (ELCC) of bids selected for the initial shortlist. PGE is subject to non-disclosure and confidentiality agreements as part of this ongoing RFP, and the attached data in Attachment A is provided subject to General Protective Order No. 21-161. PGE will also provide ELCC data directly to bidders who request to know their calculated ELCC.

In PGE's 2021 All Source Request for Proposals (RFP), renewable bids are scored according to level capacity ratio, which uses ELCC as an input. As part of PGE's request for approval of the RFP, parties recommended additional visibility into the calculation of the ELCC to ensure that bidders could accurately self-score the values, and in Staff's November 19, 2021 public meeting memo, the recommendation was included that PGE provide the actual values as calculated once the initial shortlist was selected. The Commission adopted this recommendation from Staff's November 19 memo through Order No. 21-460.

To assist in bidders estimating the ELCC of their projects, PGE also uploaded an ELCC calculator to the RFP website in November 2021. The ELCC calculator provided values by technology type and location using data from the 2019 IRP Update, which was the most up-to-date model run that existed at that time.

As part of the RFP scoring process, the ELCC for each bid is run through PGE's Sequoia model and the ELCC is determined based on actual system conditions. Variations in the outcome are largely driven by timing of the load forecast and qualifying facilities snapshot, the resource portfolio that is currently on system (which has evolved since the 2019 IRP update), and the transmission service employed by the bid.

Table 1 – Comparison of ELCC Calculator and RFP ELCC calculations

	ELCC Calculator	RFP ELCC Results
Resource characteristics	2019 IRP (proxies from HDR)	Actual bids
Existing resource portfolio	Does not include 2025 Pelton Round Butte PPA or Bakeoven II PPA	Includes both
Load forecast and qualifying facilities snapshot	June 2020 (from IRP update)	September 2021
Transmission	Assumed 100% long-term firm to PGE	Exact bid's transmission rights

If bidders have questions about the ELCC calculated for their project and how that ELCC may differ from the bidder's estimates, please email RFP@pgn.com and copy the independent evaluator – Frank Mossburg – at frank.mossburg@bateswhite.com.

Please direct any questions regarding this filing to Jimmy Lindsay at (503)464-8311. Please direct all formal correspondence and requests to the following email address pgc.opuc.filings@pgn.com

Sincerely,



Erin Apperson
Assistant General Counsel II

EEA: dm
Enclosure

Attachment A

Confidential Under General Protective
Order No. 21-161

CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of **Portland General Electric Company's ELCC Compliance Filing pursuant to Order No. 21-460** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

Service List UM 2166

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Dated this 1st of April 2022.

Danielle McCain

Danielle McCain
Legal Assistant