



10/30/2023

Docket UM 2166

In the Matter of PGE's 2021 Request for Proposals

Re: Staff Summary Upon Conclusion of RFP



Staff of the Public Utility Commission of Oregon (Staff) files this summary of information gathered from the Independent Evaluator (IE) following acknowledgment of Portland General Electric Company's (PGE's) final short list for its 2021 All-Source Request for Proposals (RFP). While the docket for a utility's RFP often concludes with an acknowledgment decision on a Company's final short list, the Commission in this docket required additional activities following its acknowledgement decision, given the circumstances at the time. Staff files these comments to confirm the required actions have been taken and to summarize information of note that it received from the IE at the conclusion of this docket.

In Order 22-315, the Commission memorialized its decision to acknowledge the final shortlist, subject to conditions, and noting that "future developments and analysis will bear heavily on PGE's ultimate procurement decision."¹ Among the conditions, PGE was directed to ensure that the IE, Bates White, continued "to serve as IE through final resource selection, in order to monitor all contract negotiations, file a final resource selection closing report with the Commission no later than 30 days after final resource selection, and respond to any Staff or Commission questions on the final IE report." It also required the IE to answer any questions about its final report from the Commission or Staff.

On June 30, 2023, Bates White filed its final report on PGE's contract negotiations for its 2021 RFP. Bates White responded to Staff's questions seeking additional detail about the report, which is attached to this memo as Attachment 1.

Staff's review of the report, and engagement with stakeholders and the IE, highlighted issues with the 2021 procurement that Staff believes are worth noting in UM 2166 before closing the docket. Staff summarizes information below that primarily concerns the Clearwater Wind resource acquired by PGE under this RFP. Further, with this memo, Staff intends to close this docket and will work with the Company and Stakeholders to reflect lessons learned in future RFPs.

Clearwater transmission minimum requirements and downsizing: The Clearwater project did not meet the requirement that all renewable energy bids have long-term transmission rights equal to 80 percent of their maximum interconnection limit or to present a viable plan that met the transmission product and quantity requirements specified by the RFP. Further, the Clearwater project was allowed to maintain a project size that did not have the required matching transmission requirements, [BEGIN
HIGHLY CONFIDENTIAL]

¹ Order 22-315 at 4.

[REDACTED] [END HIGHLY CONFIDENTIAL]

The IE Final Report on Contract Negotiations notes that the Clearwater Energy Wind project did not “quite meet the letter of the law from the RFP” with regards to its transmission rights.

These events are described in more detail below.

Table 1: UM 2166 Timeline

Date	Event
12/02/2021	RFP approved for issuance at Public Meeting (Order No. 21-460 dated 12/10/2021)
12/06/2022	RFP Issued to Market
02/04/2022	Bates White Submits Benchmark Bid Report
05/14/2022	PGE Files Final Shortlist & IE Closing Report
05/2022	PGE begins negotiations with Clearwater after FSL Filed
08/12/2022	PGE allows updates to pricing and COD
08/14/2022	FSL Acknowledged at Public Meeting (Order No. 22-315 dated 08/31/2022)
08/26/2022	Price/COD updates received
10/2022	Clearwater contract executed
06/30/2023	Bates White Final Report on Contract Negotiations for UM 2166
9/01/2023	IE responds to Staff questions on Final Report

TRANSMISSION MINIMUM REQUIREMENTS

The Clearwater wind project did not meet the requirement that all renewable energy bids have long-term transmission rights equal to 80 percent of their total interconnection. This project was developed by NextEra and offered as a benchmark bid, with a portion of the project sold to PGE under a BTA while the remainder will be owned by NextEra with the output contracted to PGE under a PPA. In its February 2022 benchmark bid report, [BEGIN HIGHLY CONFIDENTIAL]

[REDACTED] [END HIGHLY CONFIDENTIAL] This was confirmed on the Q&A webpage for the procurement.

[BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] The minimum requirements in the RFP explicitly stated that the lack of rollover rights would disqualify a project. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[END HIGHLY CONFIDENTIAL]

Bates White, nonetheless, describes the Clearwater project arrangements in its final report as “...acceptable given PGE’s renewable and capacity needs.” Bates White further explains to Staff in response to Staff’s written questions that [BEGIN HIGHLY CONFIDENTIAL]

[REDACTED]

[END HIGHLY CONFIDENTIAL]

PROJECT DOWNSIZING

At the time Clearwater was selected and contracted, it still had not secured the long-term transmission rights required by the RFP. [BEGIN HIGHLY CONFIDENTIAL]

[REDACTED]

[END HIGHLY

CONFIDENTIAL] In the case of Clearwater, the project was allowed to proceed at its initial design size and was contracted at that level, despite the lack of transmission.

[BEGIN HIGHLY CONFIDENTIAL]

[REDACTED]

[END HIGHLY CONFIDENTIAL] In

response to a question from Staff, the IE notes that, [BEGIN HIGHLY CONFIDENTIAL]

[REDACTED]

[END HIGHLY CONFIDENTIAL]

DISCLOSURE OF RESOURCES

PGE, and the IE, allowed Clearwater to continue for further evaluation and the project was eventually included by PGE on the final shortlist based on the alternative transmission plan, along with some other

² Bates White Memo in Response to Staff Questions, September 1, 2023, page 10.

independent projects that provided alternative plans that PGE deemed viable. **[BEGIN HIGHLY CONFIDENTIAL]**

[END HIGHLY CONFIDENTIAL]

OAR 860-089-0300(3) states that “If benchmark bid elements secured by the electric company are not made available to all bidders, it must provide analysis explaining that decision when seeking RFP acknowledgement and recovery of the costs of the resource in rates.” The RFP states that:

PGE’s Benchmark resources or affiliate bids will not rely on utility-controlled transmission rights to meet the 2021 All-Source RFP bid requirements. Should, through the course of this solicitation, additional certainty develop regarding the removal of Colstrip from PGE’s portfolio, PGE reserves its discretion to consider whether Colstrip associated transmission rights could become available across PGE’s planning horizon for the benefit of PGE’s customers. Should PGE make Colstrip associated transmission rights available to improve the long-term economics of a benchmark or other bid, those rights would also be made available for all bidders subject to the same constraints and limitations.

At the time of Bates White’s benchmark bid report in February 2022, **[BEGIN HIGHLY CONFIDENTIAL]**

[END HIGHLY CONFIDENTIAL].

Staff found the continued engagement of the IE to oversee the contract negotiation process to be a valuable complement to the competitive bidding process and anticipates recommending similar engagement in future RFPs. Further, Staff plans to carry lessons learned from this process to future RFP investigations. Staff intends to closely monitor the bid scoring and evaluation processes, particularly for benchmark bids, and encourage communication between bidders and the utility in future RFPs. Staff concludes that all activities that the Commission required in this docket have been completed.

Dated this 30 day of October, 2023, at Salem, Oregon.

/s/ Kim Herb

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Attachment 1

Bates White Responses to Staff Questions on
IE Final Report on PGE's Contract Negotiations for its 2021 RFP

MEMORANDUM

September 1, 2023

TO: Patrick Shaughnessy
Kim Herb
Oregon Public Utility Commission

FROM: Frank Mossburg
Bates White, LLC

SUBJECT: Answers to Staff Questions

The purpose of this memo is to provide the Independent Evaluator (IE)'s answers to follow up questions regarding the IE Report on Contract Negotiations for PGE's 2021 All Source RFP.

1. What are the transmission product and quality requirements specified in PGE's 2021 RFP as approved by the Commission and issued to the market?

Per the RFP, to qualify as a renewable resource, a Bidder must have an achievable plan for long-term transmission service for 80% of the interconnection limit of the facility. Short term firm services may be used for the remaining 20% of the facility's interconnection limit. Eligible long-term transmission services included long-term firm, long-term conditional firm bridge, or long-term conditional firm reassessment. Long-term rights must match the duration of the contract term or include rollover rights.¹

Dispatchable resources – i.e. standalone battery energy storage (BESS) units – had to have long-term firm transmission for 100% of the facility's interconnection limit. In this memo we focus on the requirements and bidding for renewable resources.

¹ RFP p 16.

2. Where in the RFP documentation was the option of submitting an alternative transmission plan included? Were there any specific criteria required of alternative transmission plans?

In several public Q&A responses PGE noted that it will “consider alternative transmission plans provided bidders that provide a clear and executable path to procuring transmission service.” There were no specific criteria stated for these plans.

3. Did the bid submitted for Clearwater, one of PGE’s benchmark projects, provide a viable alternative transmission plan to meet the transmission product and quality requirements specified in the RFP?

- a. Has the project fulfilled this plan?**
- b. What elements made the plan “viable”?**

Clearwater’s plan involves several steps. Recall that the offer was for 300 MW, split between a 100 MW PPA and a 200 MW BTA.

- All 300 MW are first delivered via a gen-tie line to Colstrip
- The supply would then be transmitted from Colstrip to Garrison via 300 MW of long-term firm service on the Northwestern transmission system held by NextEra. This service included rollover rights.
- To deliver supply from Garrison to PGE through the end of 2025 the project would use the following resources
 - 180 MW of long-term firm transmission with rollover rights held by NextEra
 - 50 MW of firm transmission via the redirect of an existing request with the Snohomish PUD held by NextEra. This service continues through 2025 but does not have rollover rights.
- For the remaining supply there were three options suggested by the bidder
 - Make short-term firm transmission purchases with BPA
 - Use PGE CTS rights when available

- Purchase a leg of transmission via the Avista system to Mid-C and import via PGE's existing rights at Mid-C

After 2025 the Snohomish contract expires the project still has 180 MW of firm service and the same options for filling the gap. The additional time also allows for consideration of other options including filling the need with a new transmission service request with BPA.

The plan is viable due to the fact that the majority of firm transmission service is covered under a long-term firm agreement with rollover rights. In the short term the bid covers 77% of its output, just 3% short of the RFP requirement and there are other avenues for securing the remaining service. In the long term the bid covers 60% of its supply at the moment but there is additional time to secure more firm service to provide additional coverage. Note that PGE evaluators did not make any official decision regarding which option the bid would use going forward to fill additional transmission needs.

We believe that Clearwater's plan was sufficient and the project has, to the best of our knowledge, fulfilled this plan.

- 4. How many other projects submitted alternative transmission plans? Which ones and at what stage of the evaluation process?**
 - a. Of these projects, how many were withdrawn or deemed nonconforming?**
 - b. Of these projects, how many submitted a plan similar to Clearwater?**

Several bidders submitted offers that did not meet the transmission requirements. Most all were deemed non-conforming though some were evaluated in part. One bid had an offer similar to Clearwater's but withdrew a portion of its offer. See the response to question #6 for more details.

- 5. If a project did not have the necessary transmission product and quality, what options were available to the bidder cure this deficiency?**

Options included resizing the offer to meet the RFP requirements or, if multiple resources were involved, offering the resources as mutually exclusive.

- 6. How many bidders submitted bids for projects that did not conform to the transmission requirements? Of those, how many bidders were asked to reduce the size of projects to conform with the transmission requirements? In an Excel spreadsheet, please list those bidders and their projects, noting:**
- a. Project Size**
 - b. Project Bid Cost**
 - c. The percent of the project's interconnection limit covered by a conforming transmission product**
 - d. Whether the bidder included an alternative transmission plan**
 - e. Whether the bidder ultimately withdrew their bid**
 - f. Whether the bid made it to the initial shortlist or the final shortlist**
 - g. If they made it to the final shortlist, why the project was not selected.**

See the attached Excel sheet. The following projects did not meet the transmission requirements of the RFP.

[BEGIN HIGHLY CONFIDENTIAL]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[END HIGHLY CONFIDENTIAL]

As can be seen, the [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] offer was the most similar to Clearwater, with [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] though it did not have the near-term coverage that Clearwater offered. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

² See RFP p 17, “Bidders relying on BPA for transmission service are required to have either previously been granted eligible transmission service or have an eligible and active OASIS status Transmission Service Request (TSR) participating in the BPA TSR Study and Expansion Process (TSEP)”.

There is no effect that we are aware of, as stated above, evaluators did not presume that a specific option was chosen to fill the remaining transmission needs of the facility and other options were presented.

11. What were the original costs for transmission associated with the Clearwater project in its bid into the 2021 RFP?

- a. Are the costs of Clearwater’s alternative transmission plans lower, higher, or the same as those included in its initial bid?
- b. If the costs of Clearwater’s alternative transmission plans are higher than those in its initial bid, by how much?
- c. If the costs of Clearwater’s alternative transmission plans are higher than those in its initial bid, would other projects have performed better relative to Clearwater in PGE’s price scoring?

There were no differences between Clearwater’s original and alternate costs. Costs for the plans outlined above [BEGIN HIGHLY CONFIDENTIAL]
[REDACTED]
[END
HIGHLY CONFIDENTIAL]

Importantly, the percentage covered by such transmission only mattered for qualification purposes - from an evaluation perspective PGE assumed that the entirety of Clearwater’s output was delivered via firm transmission and paid for as well – there was no “free ride” for the additional supply.

12. The Final Report on Contract Negotiations noted that the Clearwater project’s long-term transmission product offering “...does not quite meet the letter of the law from the RFP.” Please explain whether this is different from not meeting the requirements of the RFP and describe why the IE believes it is reasonable to include the Clearwater project in this competitive bidding process.

This statement was just meant to indicate that the project did not meet the 80% long-term firm requirements in the RFP. We believed it was reasonable to include the offer in the process because it still represented a viable, cost-effective

offer for supply that helped PGE meet its reliability and clean energy goals without pushing extensive risks onto the ratepayer.

This RFP took place amid severe industry upheaval, including price increases and extensive project delays and strain on supply chains. Most bids would not have met the COD requirements in the RFP [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] despite the RFP's prohibition against that practice. Evaluators had to be flexible in order to achieve the desired result. This is a common practice here and in similar RFPs across the country.

While it is certainly possible to run an RFP strictly per the letter of the document we do think it's important to keep the final goal of securing cost-effective supply for ratepayers in mind. An RFP run strictly to the letter that results in no purchases is typically not the desired outcome.

13. Did the Clearwater project receive the same treatment as other projects without firm transmission?

The only project in a similar space to Clearwater was the [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL], though that did not have the near-term coverage that Clearwater offered. In retrospect we as the IE could have pushed harder [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] inclusion as offered in order to assure it had the same treatment as Clearwater. At the time we (and, we believe PGE evaluators) were more focused on making the [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] offer the most competitive it could be. We saw that [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] was not competitive at all (a fact subsequently borne out by PGE analysis and verified by us) and thought that the more competitive [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] might stand a better chance as a standalone offer. [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] did not consider this and simply withdrew without any discussion.

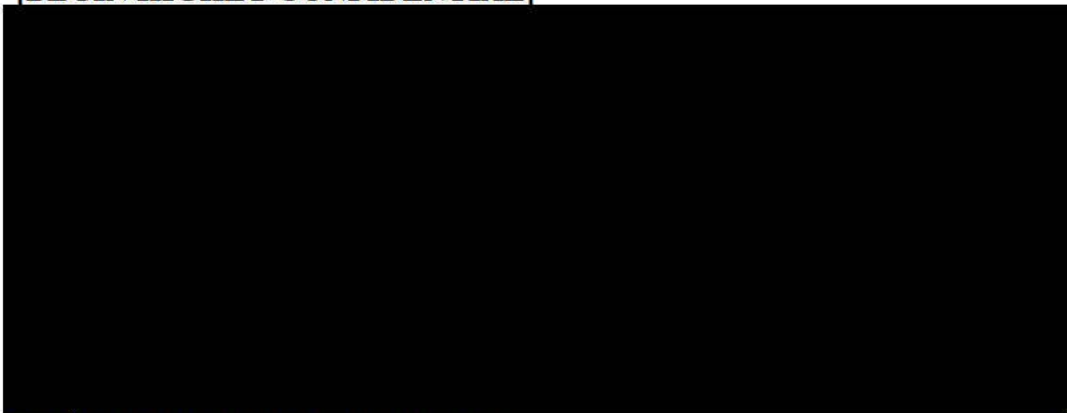
14. Does the IE's conclusion in its final report that proceeding with Clearwater is "reasonable" given PGE's renewable and capacity needs apply equally to other bids? If not, why not?

Yes, for several reasons. First, of all renewable projects that did not meet the strict RFP requirements for transmission the Clearwater offer had the strongest “alternative” plan. It covers 77% of the supply in the short term, just 3% sort of the RFP requirement, and 60% beyond that. The short-term coverage buys the project more time to seek additional coverage - something no other bid offered - and there are multiple possibilities to fill the remaining need.

Second, and vitally important, the Clearwater offer was ultimately the best performing offer in PGE’s evaluation. In the initial shortlist phase it had a cost/benefit ratio of [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL]

After the final shortlist process and contracting, during which [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] adjusted their pricing, the Clearwater project was even more competitive. See the table below which shows the cost and benefits of each bid as of January 2023, this is after [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] offered updated prices.

[BEGIN HIGHLY CONFIDENTIAL]



[END HIGHLY CONFIDENTIAL]

Recall that this assumes that all Clearwater supply is delivered at prevailing transmission rates, not just 60% or 77% of the supply. Per this analysis Clearwater is a net beneficial project, with costs being about 95% of benefits.

If Clearwater was not selected the next best bid was [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] project. This score above was prior to [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] stating that their price would increase about [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] – per our quick analysis this would be about [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL]. The project would also be delayed through [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL].

The next best offer was also [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL]. Again, this score is prior to a March re-price from the bidder, which would have made the project less competitive. The project also was tied up in [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] which brought into question its viability. As of March, [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL].

After that, the [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] projects would likely be considered, but -at best – they would have a cost to benefit ratio of about [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] so the more likely outcome was a cost/benefit ratio somewhere in the [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL].

After that were smaller projects [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] but these were not contacted and, given the industry trends at the time, would likely have had to raise their offers even more to make final contracts. All this points to alternative offers being much more costly than Clearwater.

**HIGHLY CONFIDENTIAL INFORMATION
SUBJECT TO MODIFIED PROTECTIVE ORDER NO. 22-025**

Third, the offer has its risks managed via two agreements with a respected third party developer. One of these is a pay for performance PPA the other a BTA. Both are similar to those offered by third-party bidders and feature standard risk protections such as delay damages and performance guarantees.

Fourth, the Clearwater offer provides 300 MW, or something close to the RFP target of 150 MWa. Most of the offers above **[BEGIN HIGHLY CONFIDENTIAL]** [REDACTED] **[END HIGHLY CONFIDENTIAL]** would not have provided this much supply, leaving PGE to pick up more at a later date.

Fifth, the project will be online by the required COD in the RFP of December 2024. **[BEGIN HIGHLY CONFIDENTIAL]** [REDACTED] **[END HIGHLY CONFIDENTIAL]** projects would be delayed, some by a significant amount.

In sum, the Clearwater project is a cost-effective project that meets with RFP timelines and fulfills a large amount of the RFP target with effective risk protections via standard contracts. Alternative offers would all be less beneficial and most would be some combination of later in COD and/or smaller in size.

ATTACHMENT ONE - BIDS WITH ALTERNATIVE TRANSMISSION PLANS

[BEGIN HIGHLY CONFIDENTIAL]



[END HIGHLY CONFIDENTIAL]

CERTIFICATE OF SERVICE

UM 2166

I certify that this day I served the foregoing document upon all the following parties or attorneys of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid or by electronic mail pursuant to OAR 860-001-0180 (which may include a link to a secure shared file service).

Dated this 30th day of October 2023, at Salem, Oregon.



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UM 2166
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