



Portland General Electric Company
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January 31, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street, Ste. 100
P. O. Box 1088
Salem, OR 97308-1088

Re: UM 2274 - PGE's Notice and Request for Partial Waiver of Competitive Bidding Rules

Enclosed for filing is Portland General Electric Company's (PGE) Notice and Request for Partial Waiver of Competitive Bidding Rules.

In accordance with OAR 860-089-010(2)(a), PGE is serving this Request and Notice on all parties to the most recent general rate case (UE 394), RFP filing (UM 2166), and IRP Docket (LC 73).

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488 or contact Greg Batzler at greg.batzler@pgn.com.

Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

JF/dm

Enclosure
cc: Service Lists: UE 394, UM 2166, and LC 73

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2274

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 All-Source Request for Proposals.

**PORTLAND GENERAL ELECTRIC
COMPANY’S NOTICE AND REQUEST
FOR PARTIAL WAIVER OF
COMPETITIVE BIDDING RULES**

I. INTRODUCTION

In accordance with the competitive bidding rules adopted by the Public Utility Commission of Oregon (Commission or OPUC), Portland General Electric Company (PGE) provides notice of the commencement of the process for a 2023 All-Source Request for Proposals (RFP) and requests that the Commission open a docket for this purpose. PGE’s development of its 2023 Integrated Resource Plan (IRP) and Clean Energy Plan (CEP), and commitment to continual progress toward decarbonization under House Bill HB 2021 (HB 2021) point to a likely 2026 capacity need,¹ and an anticipated need for additional carbon-free energy resources as we work toward the 2030 decarbonization target. Therefore, a 2023 RFP is necessary so that resources can be in-service in time to meet this upcoming need and to demonstrate continual progress toward the decarbonization targets specified in HB 2021. The competitive bidding rules are triggered due to the size and duration of the resources to be sought in this RFP.

As part of this filing, in accordance with OAR 860-089-0010(2), PGE also requests a partial waiver of the competitive bidding rules, including a waiver of OAR 860-089-0200(1),

¹ See December 16, 2022 meeting materials at Slide 17, available at: https://assets.ctfassets.net/416ywc1laqmd/7AUDtFKsutaZB5zUWTzbHo/db4f426352329e0fc05d30f50325b2f7/IRP_Roundtable_December_22-11.pdf

OAR 860-089-0200(2), OAR 860-089-0250(2)(a) and OAR 860-089-0250(3)(g). PGE seeks to continue working with the IE used for the 2021 RFP, to have the scoring and modeling methodology review occur in parallel with review of the draft RFP, and to have the 2023 RFP review process run in parallel with the 2023 IRP and CEP docket.

To streamline the RFP process considering the timing needs discussed below, PGE recommends the following:

1. PGE conducts the 2023 RFP in parallel with the Commission’s acknowledgement process of PGE’s 2023 IRP (a “track two” RFP process).² PGE’s 2023 IRP and CEP docket would run in parallel with the 2023 RFP, which would culminate in anticipated Commission decisions regarding acknowledgment of the 2023 IRP and CEP, and 2023 RFP final shortlist in December 2023. While the regulatory review of the 2023 IRP and CEP, and the 2023 RFP would run in parallel, PGE anticipates that the ultimate procurement volume will align with the 2023 IRP and CEP action plan once PGE’s resource plans are acknowledged. However, due to the need for concurrent processes, the estimated need outlined in the draft RFP for approval by the Commission would align with the most recently filed IRP. Additionally, as discussed below, the scoring and modeling methodology would not be discussed in the 2023 IRP, but instead would be reviewed as part of the draft RFP approval process contemplated under OAR 860-089-0250(2)(a) and below.

² Track two refers to OAR 860-089-0250(2)(a), which states “[u]nless the electric company intends to use an RFP whose design, scoring methodology, and associated modeling process were included as part of the Commission-acknowledged IRP, the electric company must, prior to preparing a draft RFP, develop and file for approval in the electric company's IE selection docket, a proposal for scoring and any associated modeling.”

2. The selection of the independent evaluator (IE) (OAR 860-089-0200(1)) and the review of the scoring and modeling methodology (OAR 860-089-0250(2)(a)) should be streamlined through partial waiver of these regulations. PGE respectfully requests that the Commission allow an extension of Bates White, who is already serving as an IE as UM 2166 commercial negotiations, continue and serve as the IE for this upcoming solicitation. Additionally, PGE recommends that the Commission allow the review of the scoring and modeling methodology to occur simultaneously with the review of the draft RFP. Parties would have an opportunity to review and provide feedback on the draft scoring and modeling methodology as part of the review of the draft RFP.
3. Development of procedural timelines that balance the need for robust regulatory review and feedback with the significant timing constraints between now and 2030. PGE looks forward to working with Staff and stakeholders to determine a procedural schedule that balances these considerations.

In accordance with OAR 860-089-0010(2)(a), PGE is serving this request on parties to the most recent general rate case (UE 394), RFP filing (UM 2166), and IRP docket (LC 73).

II. DISCUSSION

A. PGE forecasts a significant near-term capacity need, and continual progress toward House Bill 2021's decarbonization targets indicates that additional procurement actions are needed.

PGE is forecasting a significant capacity need beginning in 2026, as well as the need for additional procurement of non-emitting energy resources to make continual progress toward House Bill 2021's decarbonization targets. As shared in PGE's recent IRP routable meetings, on

December 16, 2022 and January 26, 2023,³ the capacity need in 2026 is anticipated to be at least 300 MW, which would be similar in volume—and would build upon—the procurement sought in recent RFPs.⁴ Assuming an 18-month construction cycle for new non-emitting resources, and three-to-six months of negotiations to reach commercial agreement, a December 2025 online date would necessitate a Commission decision regarding acknowledgment of the final shortlist by December 2023.

The ability to address the anticipated capacity need is dependent on timely and efficient acquisition of new non-emitting resources. The timeline to procure resources needed to meet the first compliance window is anticipated to be brisk: the most recent IRP roundtable presentation pointed to yearly procurement on a scale of approximately 170 MWa per year to achieve the 2030 decarbonization target.⁵

In addition to meeting the 2026 capacity shortfall, to work toward the resource volume necessary to meet the HB 2021 decarbonization targets, it is in the best interest of customers to take steps now through more nimble acquisition processes as opposed to a cadence that would lead to future procurements closer to the end of the decade when we approach compliance obligations. PGE's January 2023 IRP roundtable discussion highlights that from a portfolio perspective, balancing regulatory, operational, financial, and resource procurement risks point to the advantages of a linear carbon reduction pathway rather than one that delays acquisition until

³ See December 16, 2022 meeting materials at Slide 17), available at: https://assets.ctfassets.net/416ywc1laqmd/7AUDtFKsutaZB5zUWTzbHo/db4f426352329e0fc05d30f50325b2f7/IRP_Roundtable_December_22-11.pdf and slide 78, January 26, 2023 meeting materials at: (https://assets.ctfassets.net/416ywc1laqmd/68igRIq3sE4VQ9CSEK4r5P/c6982acef3768c5d645ba8f3716be18a/IRP_Roundtable_January_23-1.pdf)

⁴ UM 2166 sought 388 MW of total capacity, with up to 250 MWa from renewable resources. This volume is in addition to a likely 2026 capacity need.

⁵ See, October 25, 2022 investor presentation at Slide 18, available at: <https://investors.portlandgeneral.com/static-files/5efa674f-b441-40e7-a742-90ff0a722de5>

just before the 2030 compliance window.⁶ Meeting this linear reduction pathway will necessitate continual procurement of non-emitting resources throughout the decade. Layering procurement throughout the decade and achieving linear carbon reduction is also likely to provide the best opportunity to add resources that offer an optimal combination of geographic location, resource characteristics, advancements in technology, and access to needed transmission rights.

B. Parallel review of PGE’s 2023 RFP, and 2023 IRP and CEP is needed to align the timing of procurement processes with resource planning outcomes via a streamlined track two process.

The timeline used for past resource acquisitions is insufficient to meet the anticipated 2026 capacity need and HB 2021’s targets in a manner that achieves optimal balance of minimizing cost and risk and maximizing benefit. PGE appreciates Staff and stakeholders’ constructive feedback and recognition (in both UM 2166 and UM 2225) that resource acquisition timelines will need to be accelerated.⁷ Both the current planning process, which was estimated within UM 2225 to take 30 months (about 2 and a half years), and recent procurement processes, which have taken approximately 18 months (about 1 and a half years), are unwieldy when faced with a relatively short procurement window as we make progress toward decarbonization requirements that begin in 2030.⁸ The procurement timeline sought by PGE in this filing is

⁶ See PGE’s January 26, 2023 IRP roundtable discussion, slide 78, available at: https://assets.ctfassets.net/416ywc1laqmd/68igRIq3sE4VQ9CSEK4r5P/c6982aacef3768c5d645ba8f3716be18a/IRP_Roundtable_January_23-1.pdf

⁷ The need for planning-procurement streamlining has been identified repeatedly in UM 2225, including during the scoping phase, see Launch Announcement at 2, available at: <https://edocs.puc.state.or.us/efdocs/HAA/um2225haa142050.pdf>, May 31 OPUC Public Meeting materials at 16, available at: <https://edocs.puc.state.or.us/efdocs/HAU/um2225hau111056.pdf>; July Decarb Planning workshop Agenda, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2225hah163913.pdf>; and December Staff recommendations, see Staff Report at 5, available at: <https://edocs.puc.state.or.us/efdocs/HAU/um2225hau151158.pdf>. In UM 2166, Staff recommended acknowledgment of the Final Shortlist at a higher volume to procure more quickly toward the HB 2021 decarbonization targets. See, Docket No. UM 2166, Staff Memo at 23, available at: <https://edocs.puc.state.or.us/efdocs/HAU/um2166hau163745.pdf>

⁸ Staff timelines show a 30-33 month IRP analysis and acknowledgement cycle. See: Staff’s memo on threshold planning framework issues for CEPs, Appendix A at 14, Figure 4, available at: <https://apps.puc.state.or.us/orders/2022ords/22-206.pdf>

intended to streamline the resource procurement process while retaining robust opportunities for regulatory review and feedback.

In the last RFP under the competitive bidding rules, PGE followed a “track one” approach, in which the IRP was reviewed and acknowledged, then the scoring methodology was vetted in the IE docket, and then the RFP was drafted, reviewed, and approved. Given the anticipated 2026 capacity need, a track one schedule where the scoring and modeling methodology is vetted in the IRP is not workable to acquire resources specified in the action plan in a timely enough manner. Based on a projected schedule of 18-months for resource construction and 3-to-6 months for commercial negotiation, the 2026 capacity need should prompt immediate initiation of the 2023 RFP. The track two process recommended in this filing for the 2023 RFP would allow for regulatory review of both the scoring and methodology and the draft RFP simultaneously. Additionally, review of the draft RFP would occur simultaneously with review of the 2023 IRP and CEP, which would culminate with acknowledgment of the final shortlist by December 2023. As the timing of both the 2023 RFP and the 2023 IRP and CEP would run through the fourth quarter of 2023, it is PGE’s intent that the volume to be acquired through the 2023 RFP would align with the volume of resources specified in the 2023 IRP action plan that is ultimately considered for Commission acknowledgment.

The resource need and timing associated with the 2023 IRP and 2023 RFP represents good cause to use a streamlined track two process as contemplated in OAR 860-089-0250(2)(a) and reviewing the 2023 RFP simultaneously with the 2023 IRP and CEP.

C. Partial waivers of OAR 860-089-0200(1), OAR 860-089-0200(2), and OAR 860-089-0250(2)(a) will streamline process while retaining robust regulatory review.

PGE issued a request for proposal to seek IE candidates as part of its 2021 RFP, which occurred approximately 18 months ago.⁹ The successful candidate—Bates White—oversaw the 2021 RFP process and continues to report to the Commission as PGE continues to progress on its commercial negotiations associated with the 2021 RFP. On December 1, 2022, PGE provided a status update within Docket UM 2166 and provided the Commission an estimate of the cost of extending Bates White through the end of March 2023 to allow for continued engagement.

As resource needs become more frequent, opportunities to streamline process are of increasing importance. PGE notes that it may be inefficient to run a new competitive process to solicit an IE while an IE continues to be engaged as selected through a recent competitive process. As Bates White continues to serve as the active IE and was selected via a competitive solicitation process less than two years ago, PGE recommends a waiver of the requirement to solicit a new slate of IE candidates as part of its 2023 RFP and rather extend Bates White's services as the IE.

Under OAR 860-089-0200, Commission Staff will recommend an IE to the Commission based in part on consideration of: (a) input received from the electric company and interested non-bidding parties, (b) review of the degree to which the IE is independent, (c) degree to which the costs are reasonable, (d) the experience and competence of the IE, and (e) the public interest. The Commission selected Bates White to serve as IE for PGE's 2021 RFP in Order No. 21-235 on July 15, 2021. As part of that process, Staff conducted an independent review of the IE bids and recommended that the Commission approve Bates White.¹⁰ In making that

⁹ UM 2166, PGE's Application for Approval of Independent Evaluator for 2021 All-Source RFP, filed May 5, 2021, available at: <https://edocs.puc.state.or.us/efdocs/HAH/um2166hah15141.pdf>.

¹⁰ Order No. 21-235, Appendix A at 5.

recommendation, Staff outlined its consideration of the elements outlined in OAR 860-089-0200. During that process, Bates White was one of the top three scorers and had experience that set it apart from the other top scoring bidders which included prior IE experience, familiarity with the unique Pacific Northwest, extensive knowledge of renewables and energy storage, understanding of the competitive bidding rules, and the ability to assess fairness of scoring and the unique risks and advantages of various ownership structures.¹¹ These strengths are still relevant today to the upcoming 2023 RFP and therefore, PGE recommends that Bates Whites serve as IE for the 2023 RFP. For this reason, good cause exists to waive OAR 860-089-0200(1) and (2).

Similarly, regulatory review of PGE's 2021 RFP occurred within Docket UM 2166 less than two years ago, including a robust regulatory process around scoring and modeling methodology—culminating with Order No. 21-320—and additional regulatory review of scoring and modeling as part of the review of the draft RFP, which was approved through Order No. 21-460. As the 2023 RFP immediately follows the 2021 RFP, PGE will likely use the scoring methodology from UM 2166 as a basis for developing the 2023 RFP. Proposed changes to the scoring and modeling methodology are likely to be driven by regional and macroeconomic factors and could be reviewed simultaneously with the other elements of PGE's draft RFP.

This request to waive the scoring and modeling methodology procedural review requirements under OAR 860-089-0250(2)(a) is aimed at addressing similar concerns that appeared to be at issue in the regulatory procedural schedules granted to Idaho Power Company and PacifiCorp through Orders 22-495 and 21-469, respectively. In both waiver requests granted by the Commission, Staff noted that scheduling constraints associated with the RFP timing

¹¹ Order No. 21-235, Appendix A at 7.

needs served as good cause for a partial waiver to be granted.¹² The timing requirements necessary to address PGE’s anticipated 2026 capacity need and to make continual progress toward House Bill 2021’s decarbonization targets similarly serve as good cause here. Under PGE’s proposed approach, staff and stakeholders would still review PGE’s proposed scoring and modeling methodology, but it would occur as part of the review of the draft RFP.

PGE looks forward to working with Staff and parties to determine a procedural timeline that retains a robust and inclusive regulatory review process, while recognizing the need for accelerated action to meet capacity needs and decarbonization requirements. PGE anticipates proposing a high-level schedule that generally aligns with the following:

Timing	Procedural step
January 31, 2023	Notice and waiver filed by PGE
February – June 2023	Procedural schedule set, PGE files draft RFP, review and feedback on draft RFP from stakeholders, Commission consideration of approval of draft RFP
July/August 2023	RFP issuance to market
December 2023	Final shortlist acknowledgment

III. Request

For the reasons stated above, PGE respectfully seeks a partial waiver of the requirements of OAR 860-089-0200(1), OAR 860-089-0200(2), OAR 860-089-0250(2)(a), and OAR 860-089-0250(3)(g). PGE seeks to continue working with the IE used for the 2021 RFP for the 2023 RFP, to have the scoring and modeling methodology review occur in parallel with

¹² UM 2255, Order No. 22-495, Appendix A at 8; UM 2193, Order No. 21-469, Appendix A at 3-4.

review of the draft RFP, and to have the 2023 RFP review process run in parallel with the 2023 IRP and CEP docket. As discussed in this filing, good cause exists to grant PGE's request for the partial waivers requested.

IV. Communications

Communications regarding this application should be addressed to:

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DATED this 31st day of January, 2023.

Respectfully submitted,



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Exhibit A

Notice of Portland General Electric Company's Request for Partial Waiver of Competitive Bidding Rules

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2274**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 All-Source Request for Proposals.

**Notice of PGE’s Request for Partial Waiver of
Competitive Bidding Rules**

On January 31, 2023, Portland General Electric Company (PGE) filed a request with the Public Utility Commission of Oregon (the Commission or OPUC) seeking an order granting a partial waiver of competitive bidding rules.

Approval of PGE’s request will not authorize a change in rates.

Persons who wish to obtain a copy of PGE’s request will be able to access it on the OPUC website.

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than March 2, 2023.

Dated January 31, 2023.

/s/ Jaki Ferchland
Jaki Ferchland
Manager, Revenue Requirement
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Request for Partial Waiver of Competitive Bidding Rules** to be served by electronic mail to those parties whose email addresses appear on the attached service lists for OPUC Docket No. UE 394, UM 2166, and LC 73.

Dated at Portland, Oregon, this 31st day of January, 2023.

/s/ Jaki Ferchland

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