

**BrightNight's Comments in Response to PGE's Filing on July 17, 2023,  
and in light of the Procedural Schedule shift to the Right as Staff  
Reviews the 2023 CEP/IRP Addendum**

**Presented to: OREGON PUBLIC UTILITY COMMISSION**

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July 21, 2023

A handwritten signature in black ink that reads "Valerie Barros". The signature is written in a cursive style with a long horizontal flourish at the end.

Dear OPUC Staff,

BrightNight, LLC (BrightNight) appreciates PGE's acknowledgement of the previously unrealistic timelines in the draft RFP and the extension to consider projects with commercial operation dates (CODs) as late as the end of 2027. As Staff takes this extra month to review the addendum to the CEP/IRP in light of the forthcoming procurement process, BrightNight would like to make two suggestions to Staff, and the PGE RFP Team, which are intended to bring greater alignment between the RFP and PGE's identified resource need, and create a procurement process that increases competition and results in the identification of the assets that will bring the most value to PGE's customers.

**1) PGE should convert the Minimum Bidder Requirements into a Non-Price Score.**

Changing the eligible CODs without also changing the Minimum Bidder Requirements could have only a marginal impact on the number of projects that are evaluated. The Minimum Bidder Requirements in Appendix N require a fully permitted project. If an asset is fully permitted by the final shortlisting date, as suggested in Appendix N, then (unless interconnection energization is delayed) it can likely achieve COD by the end of 2026.

BrightNight agrees that the development status and outstanding development risk of an asset is important and should be considered in the selection of shortlisted and contracted assets. Nearer CODs heighten the importance of more fully de-risked assets before shortlisting. The scoring of Projects with a 2026 COD or earlier should place more weight on the Non-Price Score, as PGE's reliance on them is higher and the consequences of failure are greater for customers. However, for a project with a COD at the end of 2027 or later, it is reasonable that the project will not be fully permitted by the final shortlisting date. Similarly, the interconnection and transmission request status should be considered, but should not, as written in Appendix N, result in the elimination of the bid's evaluation in the RFP.

Projects that do not meet the Minimum Bidder Requirements may result in higher failure rates, but since these projects should also have later CODs, PGE will have time to fill the small volume of capacity that is theoretically more likely to fail, without eliminating high-value assets for PGE's customers.

Converting the Minimum Bidder Requirements into a Non-Price Score is the most reasonable way to address PGE's concerns around development risk of an asset, without eliminating the evaluation of valuable assets, and aligning the needs identified in the CEP/IRP with the RFP.

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**2) PGE should consider projects with CODs through the end of 2028, or longer.**

In PGE's July 17, 2023, filing PGE said:

- “In PGE’s 2023 Clean Energy Plan (CEP) and Integrated Resource Plan (IRP), the need for new resources is currently expected to be constant through the end of the decade.”
- “PGE’s LC 80 Addendum filed July 7, 2023, indicates that the annual energy need - defined as the amount of system deficit expected over a typical year, expressed in average MW (MWa) – is now forecast to be 261 MWa (approximately 750 MW nameplate) per year through 2028.”

Considering PGE’s clarity around its energy and capacity needs, the cost, burden, and time to run and manage an RFP, and the supply-demand imbalance of the region, why wouldn’t PGE procure longer-dated CODs? Procuring more resources, for a longer window, is likely a better use of PGE’s internal resources and a way to reduce uncertainty for future need while securing the most competitive assets.