

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2274**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

2023 All Source Request for Proposals and  
request for partial waiver of Oregon  
Administrative Rule OAR 860-089-0200(1)  
and (2), OAR 860-089-0250(2), and  
OAR 860-089-0250(3)(g)

**COMMENTS OF PORTLAND  
GENERAL ELECTRIC COMPANY**

Portland General Electric Company (PGE) appreciates the discussion that has occurred in UM 2274 thus far via stakeholder comment and the workshop held on March 2, 2023. PGE provides this additional information to further update the projected capacity need from what was included in the January 31, 2023 notice and waiver request filing and to clarify that PGE's intent is to align any final shortlist acknowledgment request in this docket to an acknowledged outcome in PGE's resource planning process (LC 80).

1. **PGE's Clean Energy Plan and Integrated Resource Plan (CEP/IRP) project a capacity and energy need in 2026.** On March 31, 2023, PGE filed the company's CEP/IRP. The CEP/IRP makes clear that there is a projected capacity need in 2026,<sup>1</sup> as well as a need to add clean energy resources<sup>2</sup> to ensure continual progress toward decarbonization targets. These energy and capacity needs fall within the action plan window and Section 12.3 of the CEP/IRP highlights the need for an accelerated process to ensure acquisition of resources that can be in-service in time to meet the

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<sup>1</sup> Portland General Electric IRP/CEP, page 124, figure 43.

<sup>2</sup> Portland General Electric IRP/CEP, page 122, figure 42.

projected portfolio needs in 2026.<sup>3</sup>

As noted in PGE's waiver filing<sup>4</sup> and in the March 2, 2023 workshop presentation,<sup>5</sup> the timing associated with having a project in-service by January 1, 2026 would necessitate receipt and scoring of bids beginning in summer 2023, with the ability to determine a final shortlist and recommended volume of resources for acquisition simultaneously with potential Commission acknowledgment of the capacity need within the IRP/CEP, which is currently projected to be in the first quarter of 2024. As the IRP/CEP forecasts that there is a projected 2026 need, PGE respectfully recommends approval of the January 31, 2023 waiver request to ensure that the company is positioned to address any 2026 capacity and energy needs if those needs are acknowledged.

2. **PGE anticipates that any procurement in the 2023 RFP would be informed by an acknowledged capacity/energy need in LC 80.** As the timing needs associated with a 2026 capacity/energy need would require PGE to be ready to recommend a final shortlist to transact once an IRP acknowledgment decision is made, PGE has proposed parallel review of the CEP/IRP and RFP to ensure that the company can acquire resources – if needed – on the timeline specified in the resource planning process.<sup>6</sup> PGE reiterates that the company does not view approval of the waiver request and/or approval of a draft RFP as impacting review of either the CEP/IRP action plan or any future final shortlist request for acknowledgment. PGE's intent is to develop a final shortlist and to request acknowledgment of the final shortlist – if

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<sup>3</sup> Portland General Electric IRP/CEP, page 311-312

<sup>4</sup> (UM 2274) PGE request for partial waiver of the competitive bidding rules, filed January 31, 2023, page 5.

<sup>5</sup> (UM 2274) PGE presentation from the workshop held March 2, 2023, slide 5.

<sup>6</sup> (UM 2274) PGE request for partial waiver of the competitive bidding rules, filed January 31, 2023, page 2.

appropriate – based on the acknowledged capacity/energy need within the 2023 CEP/IRP reviewed in docket LC 80.

PGE’s understanding is that approval of an RFP structure and scoring methodology, and the ability to receive/score bids on a timeline in parallel to regulatory review of the CEP/IRP does not equal assurance that there will be an acknowledged capacity need or assurance that a final shortlist will be acknowledged. Rather, it allows for final shortlist construction and request for acknowledgment – if needed – to occur quickly enough to meet capacity and energy needs, rather than to follow a sequential process that would preclude acquisition of any acknowledged 2026 resource need.

For the reasons stated above, PGE continues to respectfully recommend that the Commission grant its request for a partial waiver of the competitive bidding rules discussed in the January 31, 2023 filing.

DATED this 14<sup>th</sup> day of April, 2023.

Respectfully submitted,



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