

# **BrightNight's Comments to PGE's 2023 All-Source RFP**

**Presented to: OREGON PUBLIC UTILITY COMMISSION**

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June 16, 2023

BrightNight, LLC (BrightNight) has assets that have been strategically developed to maximize the value of Portland General Electric's (PGE) existing transmission and interconnection capacity and provide high value to PGE's customers by optimizing this scarce resource. Accordingly, BrightNight has an interest in ensuring a fair and holistic approach to evaluating this RFP. Specifically, BrightNight provides comments as follows: (1) Consistent with Bates White LLC's comments, BrightNight agrees that the permissible commercial operation date (COD) should be extended. However, BrightNight suggests extending beyond 2026 CODs considering persistent supply chain constraints and interconnection and permitting timelines, and PGE's needs. (2) The Minimum Bidder Requirements are overly stringent and may eliminate projects that provide high value to PGE's customers.

- (1) PGE should extend permissible CODs beyond 2025 (and beyond 2026, as suggested by Bates White).

PGE should consider projects with CODs within the decade as an acknowledgement of development timelines and PGE's growing system needs.

The timeline to develop and construct renewable energy and battery energy storage systems has increased substantially over the past decade. Notably, labor constraints, permitting and interconnection timelines have increased, and, since Covid, supply chain constraints persist. Main Power Transformer deliveries can take 100+ weeks from the date of order to delivery.

According to PGE's 2023 Clean Energy Plan and Integrated Resource Plan, capacity and flexibility needs step upwards in 2026 and continue to grow through the planning horizon. An RFP that only considers CODs in 2025 or 2026 narrows the projects that can participate, which reduces the usefulness of the RFP.

- (2) PGE should consider the Minimum Bidder Requirements as part of a rubric, as opposed to a way to eliminate projects.

The Minimum Bidder Requirements in Appendix N are defined too rigidly and will eliminate projects that will add value to the PGE system, and therefore PGE's customers. The Minimum Bidder Requirements should be turned into a rubric and considered in conjunction with the results of the ROSE-E Model.

The closer a project is to meeting the Minimum Bidder Requirements, the higher score it gets. This score is taken into consideration as a measure of project readiness. The ROSE-E Model results evaluate the asset will evaluate the assets contribution to costs and risks. Taken together, these scores can help inform the winning projects.

*/s/ Valerie Barros*  
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