

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2274

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

2023 All-Source Request for Proposals,
Request for Partial Waiver of Competitive
Bidding Rules

NORTHWEST &
INTERMOUNTAIN POWER
PRODUCERS COALITION'S
RESPONSE TO NEWSUN'S
MOTION

I. RESPONSE

The Northwest & Intermountain Power Producers Coalition (“NIPPC”)¹ respectfully submits to the Oregon Public Utility Commission (the “OPUC” or “Commission”) this Response to NewSun Energy LLC’s (“NewSun”) Motion for Scheduling Conference and to Amend Procedural Schedule filed on December 20, 2023 in accordance with the Administrative Law Judge’s (“ALJ”) ruling filed on December 22, 2023. In general, NIPPC is not opposed to slight delays in schedule, but any delays should not materially delay issuance of Portland General Electric Company’s (“PGE”) 2023 Request for Proposals (“RFP”) to the market, as proposed by NewSun. NIPPC’s comments specifically address its position regarding the three main upcoming dates: 1)

¹ NIPPC is a membership-based advocacy group representing electricity market participants in the Pacific Northwest. NIPPC members include independent power producers (“IPPs”), electricity service suppliers, and transmission companies. NIPPC’s current member list can be found at <http://nippc.org/about/members/>.

the Public Meeting to consider the RFP; 2) the issuance of the RFP to the market; and 3) the filing of the final shortlist for acknowledgement.

The Public Meeting date is currently scheduled for January 4, 2024. NIPPC would prefer to keep the Public Meeting date, but is open to working with the Commission and the parties to find another, mutually agreed upon date in early to mid-January for the Public Meeting

Per PGE's website, the RFP is scheduled to be issued to the market on January 17, 2024 with non-benchmark bids due by March 15, 2024.² NIPPC's preference is to maintain this schedule. However, NIPPC does not oppose a slight delay at the beginning of the RFP, as long as it does not materially delay issuance of the RFP to market, as proposed by NewSun. NIPPC's strong preference is that the RFP still be issued to the market on or relatively close to the proposed issuance date and that bids be due about two months after it is issued to the market.

Further, NIPPC is not opposed to moving the date for PGE filing the final shortlist acknowledgement request out a short period of time. Currently, PGE is scheduled to file a request for acknowledgment of the final shortlist on June 7, 2024. This date is aspirational and contingent upon negotiations with bidders, and PGE is not required to file a request for acknowledgment of the final shortlist by a certain date.

Overall, if there are any delays to the RFP schedule, then the commercial operation date should also be moved out on a day-for-day extension for any delay. The

² See RFP Schedule, <https://portlandgeneral.com/about/who-we-are/resource-planning/procuring-clean-energy>.

commercial operation date is the date in which projects must be operational by. If the RFP schedule will be delayed, then it is only fair that bidders have additional time to develop projects and the commercial operation date should be extended to accommodate any delay.

II. CONCLUSION

NIPPC is not opposed to slight modifications of the RFP schedule, but NIPPC urges the Commission to not materially delay issuance of the RFP to the market.

Dated this 27th day of December 2023.

Respectfully submitted,

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