



Portland General Electric Company

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Erin E. Apperson

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April 29, 2024

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 2274 Portland General Electric RFP Evaluation Compliance Filing

Dear Filing Center:

This filing serves to seal Portland General Electric Company's (PGE) scoring of third-party Investment Tax Credit eligible (ITC-e) bids, consistent with direction in "PRR Participation Condition 2" in Commission Order No 24-011 in Docket UM 2274.

Provided as Attachment A is independent evaluator Bates White's analysis of the evaluation of ITC-e bids received on April 5, 2024. This file contains highly protected information under Modified Protective Order 24-083, and is submitted via protected .zip file.

Please direct any questions regarding this filing to Jacob Goodspeed at (360) 936-7527. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Apperson", with a long horizontal flourish extending to the right.

Erin E. Apperson
Managing Corporate Counsel



MEMORANDUM

April 29, 2024

TO: Sudeshna Pal
Kim Herb
Oregon Public Utility Commission

FROM: Frank Mossburg
Bates White, LLC

SUBJECT: IE Analysis of Third Party BTA Bids

The purpose of this memo is to provide the Commission and Staff with the Independent Evaluator's review of the third-party solar Build-Transfer Agreements (BTAs) offered into Portland General Electric (PGE)'s 2023 All Source RFP (RFP).

BACKGROUND

The 2023 All Source RFP was issued on February 2, 2024. The RFP featured a staggered bid submission process. Per Oregon Administrative Rules Company-sponsored Benchmark bids were evaluated and scored first. Those bids were due on February 23, 2024. Bates White provided a report on the scoring of those bids on March 28, 2024 and an errata report on April 4, 2024.

Per the RFP third party solar BTA offers were to be evaluated after Benchmark offers and prior to other third-party bids. The original submission date for these proposals was March 26. This was moved back to April 5 in order to finish the evaluation of the Benchmark offers.

THIRD-PARTY BIDS

PGE received bids on April 5 from two bidders. These bidders offered a total of three projects. **[Begin Highly Confidential]**



[Redacted]

[Redacted]

[End Highly Confidential]

EVALUATION

Per the RFP the first step in bid evaluation is a screening for minimum requirements. These are laid out in Appendix N of the RFP. There are a number of requirements including COD, site control, transmission and interconnection, size, delivery point and more.

All three projects failed the minimum requirements screen.

[Begin Highly Confidential]

[Redacted]

[End Highly Confidential] Per the RFP bidders must have an active generation interconnection request in the transmission provider's interconnection queue and a completed system impact study by the transmission provider.¹ [Begin Highly Confidential]

[Redacted]

[End Highly Confidential] Per a public Q&A PGE stated that "If a bid is unable to satisfy these requirement [sic] then the bidder is invited to provide a narrative describing how the project will secure a Facilities Study to support the project's COD."² [Begin Highly Confidential]

[Redacted]

[End Highly Confidential]

[Begin Highly Confidential]

[Redacted]

¹ RFP, Appendix N, p 5.

² <https://portlandgeneral.com/about/who-we-are/resource-planning/procuring-clean-energy>
Accessed on April 25, 2024.

[Redacted]

[Redacted]

[Redacted]

[Redacted] **[End Highly
Confidential]**

CONCLUSION

We were consulted prior to notifying each bidder of their issues and we agreed with PGE's assessment. Both bidders were informed of these deficiencies and provided a chance to cure. Neither bidder provided acceptable remedy for the deficiencies and both bids were rejected. This concluded the analysis of third party offers.

³ RFP Appendix N, p 4-5.

⁴ Ibid, p 5-6. Long term firm service included conditional firm, bridge, number of hours and reassessment number of hours services as well as system conditions service.

⁵ Ibid, p 6.

CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of Attachment A of Portland General Electric Company's Compliance Filing with Highly Protected Information on the parties listed below via electronic mail in compliance with Order No. 20-088.

Service List UM 2274

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Dated this 29th day of April, 2024.

/s/ Lauren Davis

Lauren Davis, Paralegal