

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 80

In the Matter of

PORTLAND GENERAL ELECTRIC CO.,

2023 Clean Energy Plan and Integrated
Resource Plan.

ROUND ONE COMMENTS OF GRID
UNITED LLC ON PORTLAND
GENERAL ELECTRIC CO.'S 2023
CLEAN ENERGY PLAN AND
INTEGRATED RESOURCE PLAN

Grid United LLC (“Grid United”) is a transmission development company focusing on building infrastructure projects that will help modernize the U.S. electric grid. Grid United is developing a series of utility-scale, interregional transmission line projects to increase reliability and provide low-cost electricity to consumers. Grid United submitted comments in Round 0 of Portland General Electric’s (“PGE”) 2023 Clean Energy Plan and Integrated Resource Plan (“IRP”) proceeding.¹ In its initial comments, Grid United requested that (1) PGE produce a more robust analysis of regional transmission needs by including more proxy resources in its analysis of proxy transmission options; and (2) PGE’s analysis include the evaluation of benefits specifically derived from connections to distant, organized markets that are achieved through interregional transmission projects rather than focusing solely on regional proxy resources.

¹ *In the Matter of Portland General Electric, 2023 Clean Energy Plan Integrated Resource Plan* (“PGE IRP”), Grid United’s Initial Comments, Docket LC 80 (May 4, 2023), available at: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAC&FileName=lc80hac12301.pdf&DocketID=23636&numSequence=42>.

In its response to Grid United’s initial comments, PGE agreed that a more detailed analysis of transmission would better inform its preferred portfolio and that it hopes to improve its transmission modeling capacity going forward.² However, PGE stated that because this IRP was its first attempt to include transmission resources in portfolio modeling, it chose to rely on two proxy resources rather than include the level of detail Grid United requested because they demonstrate the benefit of resource diversity and access to markets.³ PGE states that although the proxy resources are defined as transmission to Wyoming and Nevada, the results associated with them shed light on transmission expansion to other locations.⁴

While Grid United appreciates PGE’s response regarding transmission alternatives, it believes that the two proxy resources PGE selected in its IRP do not show the benefits of access to new markets that other locations would show. While Wyoming and Nevada might be indicative of resource diversity and expansion to other areas within the Western Interconnection, the location of those proxy resources does not allow for the full suite of interregional benefits PGE could capture through new transmission to other organized markets, which it should evaluate as tools to manage its capacity, energy, and decarbonization needs. As an example of another proxy resource area that could be considered, Grid United’s North Plains Connector (“NPC”) project bridges the Western and Eastern Interconnections and is capable of bi-directional transport of up to 3,000 MW between Colstrip, Montana and Bismarck, North Dakota. While the two proxy resources PGE selected in Wyoming and Nevada have the benefit of diversified generation profiles, they lack connections to new liquid, organized markets. A proxy like the NPC project would similarly

² PGE IRP, PGE’s Response to Initial Comments, Docket LC 80 (May 31, 2023) at Page 36, available at: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAC&FileName=lc80hac102443.pdf&DocketID=23636&numSequence=55>.

³ *Id.* at Page 40.

⁴ *Id.*

provide access to diversified generation sources and would also include access to the Midcontinent Independent System Operator and Southwest Power Pool markets. These liquid, organized markets two time zones from PGE's load would provide PGE with the ability to import energy to fill shortfalls or charge storage, export energy to monetize otherwise curtailed generation, and would provide flexibility with respect to emerging market structures and regional coordination plans.⁵ As further detailed in our Round 0 comments, connections to these organized markets would provide access to a significantly broader pool of low cost energy resources that are centrally cleared with transparent pricing mechanisms to meet immediate system needs.⁶

As PGE notes in its IRP, "the magnitude and timing of additional transmission capacity is the largest factor that influences resource additions and cost and risk metrics of portfolios" and transmission is also notably difficult and with a long lead-time to implement.⁷ PGE's IRP Addendum shows the rapid growth of transmission need in the back half of this decade, through 2040, with transmission need growing to ~1.6 GW by 2030, ~4.6 GW by 2035 and ~9.4 GW by 2040.⁸ We agree with PGE's comments in the IRP Addendum around the importance of clearly articulating long-term transmission needs and how they fit into resource acquisition plans.⁹ Proactive transmission planning and involvement in projects is critical to seeing them come online when they are needed. A sharper focus on the transmission options available to PGE, their benefits,

⁵ PGE IRP, Grid United's Initial Comments, Docket LC 80 (May 4, 2023) at Pages 8-9, available at: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAC&FileName=lc80hac12301.pdf&DocketID=23636&numSequence=42>.

⁶ *Id.* at Pages 6-9.

⁷ PGE IRP at Page 31.

⁸ PGE IRP, PGE's Addendum Filing, Docket LC 80 (July 7, 2023) at Page 21, available at: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HTB&FileName=lc80htb16164.pdf&DocketID=23636&numSequence=74>.

⁹ *Id.*

and how they will be implemented will ensure that PGE can meet its decarbonization goals on time and in the most cost-effective manner possible.

As a result, Grid United requests that:

- PGE include an interregional proxy resource that would provide additional benefits in additional analysis as part of the 2023 IRP Update or a future IRP. Otherwise, Grid United thinks that the interregional transmission benefits analysis of this IRP is too limited to inform the substantive transmission analysis PGE is seeking to achieve in this and future IRPs.
- Staff recommend that the Commission direct PGE to include a detailed analysis and discussion of interregional transmission in its 2023 IRP Update that includes different locations of proxy resources, the wide variety of benefits that access to organized markets can provide and how PGE may include these benefits in its resource and transmission planning.

Dated this 27th day of July, 2023.

Respectfully submitted,

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