



February 7, 2022

Public Utility Commission of Oregon
201 High St. SE #100
Salem, OR 97301

RE: LC 77 – In the Matter of PacifiCorp (dba Pacific Power) 2021 Integrated Resource Plan

Dear Commissioners, Judge Mapes, and Judge Rowe:

Clearway Energy Group (“Clearway”) submits these comments on the January 21 ruling regarding disclosure of confidential information requested by NewSun Energy (“NewSun”). Clearway is one of the largest renewable energy companies in the United States, with projects under operation in 26 states and additional projects under development across the country. Clearway was a bidder into PacifiCorp’s 2020 All-Source RFP and is currently negotiating power purchase agreements with PacifiCorp for two projects named to the Final Shortlist in that RFP. Clearway is developing additional projects in the Northwest that we expect to bid into upcoming utility solicitations.

Clearway strongly opposes the disclosure of bid information to NewSun. We understand that the data requested by NewSun may include detailed commercial information on multiple Clearway projects in development, including project identification, pricing, and energy modeling. In the competitive market of renewable energy development, information on individual project bids – including the structure of products and pricing that a developer proposes for a specific project – is closely held by developers and not shared with competitors. Granting NewSun’s request would result in Clearway’s commercially sensitive information being disclosed to a direct competitor, which would harm Clearway’s business interests and competitiveness in future solicitations. While we understand NewSun would be prohibited from using this confidential information in another regulatory proceeding, it seems unavoidable that pricing and other bid information would give NewSun an understanding of other developers’ commercial interests and strategy in the region that would disadvantage Clearway and other developers whose information is disclosed.

For this reason, Clearway respectfully requests that the ruling be modified to exclude information about bids into the 2020 All-Source RFP from the material required to be disclosed to NewSun.

Thank you for the opportunity to comment on this issue.

Respectfully submitted,

Julia Zuckerman
Head of External Affairs, West
Clearway Energy Group