

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 80

In the matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 Integrated Resource Plan and Clean
Energy Plan.

ROUND 1 COMMENTS OF NEWSUN
ENERGY LLC

I. INTRODUCTION

Pursuant to the Ruling issued July 14, 2023, NewSun Energy LLC (“NewSun”) hereby submits these Phase 1 Comments on Portland General Electric Company’s (“PGE’s”) 2023 Integrated Resource Plan (“IRP”) and Clean Energy Plan (“CEP”). PGE modeled this IRP under the assumption that transmission upgrades and proxy resources will be online and available within the timeline set by Oregon House Bill 2021 (2021 session) (“HB 2021”), which mandates significant greenhouse gas (“GHG”) emissions reductions by 2030. However, PGE failed to prove its assumptions are economically and technically feasible given the timeline. Any new transmission builds or resources that rely on new transmission builds should, by default, assume at least 15 years to be fully developed and brought online, but at a minimum, 10 years. In relying on uncertain transmission assumptions, the full potential of other timeline viable resources like community based renewable energy (“CBREs”) and distributed generation (“DERs”) may not be realized, the result of which being that PGE does not meet its 2030 HB 2021 GHG reduction target. NewSun welcomes PGE to provide more detailed documentation that validates the IRP/CEP’s economic and technical feasibility, but absent this analysis PGE should prioritize

models and assumptions that surely meet the 2030 emissions target. The IRP and CEP as it stands is not economically or technically feasible and contrary to the public interest. The Commission ought to devote diligent attention in evaluating this IRP for approval. NewSun recommends the Commission direct PGE to amend this IRP and CEP, including transmission assumptions, modeling, and company actions, to comport with HB 2021.

II. STANDARD OF REVIEW

The Commission reviews IRPs for compliance with its rules and IRP Guidelines.¹ Recently, the Commission partially waived IRP Guideline 1(c) for PacifiCorp and PGE to reflect that the primary goal of the IRP should no longer be limited to selecting the portfolio with the best combination of expected costs and associated risks and uncertainties, but in light of the passage of HB 2021 to also account for “the pace of greenhouse gas emissions reductions, and community impacts and benefits.”² Further, under HB 2021, the Commission’s responsibility is to review PGE’s inaugural CEP for compliance with the statutory criteria. The Commission must acknowledge the CEP if it is in the public interest and consistent with the clean energy targets set forth in ORS 469A.410.³ In evaluating whether the plan is in the public interest, the Commission shall consider:

- (a) Any reduction of greenhouse gas emissions that is expected through the plan, and any related environmental or health benefits;
- (b) The economic and technical feasibility of the plan;
- (c) The effect of the plan on the reliability and resiliency of the electric system;
- (d) Availability of federal incentives;
- (e) Costs and risks to the customers; and

¹ *In re Pub. Util. Comm’n of Or Investigation into Integrated Resource Planning*, Docket No. UM 1056, Order No. 07-002 at Appendix A (Jan. 8, 2007) as corrected by Errata Order No. 07-047 (Feb. 9, 2007).

² *In re Pub. Util. Comm’n of Or., Request to Waive IRP Guideline 1(c) for Pacific Power and Portland Gen. Elec. For the First Clean Energy Plans*, Docket No. UM 2225, Order No. 23-060, Appendix A at 5 (Feb. 23, 2023).

³ ORS 469A.420(2).

(f) Any other relevant factors as determined by the commission.⁴

The clean energy targets mandate that PGE reduce its GHG emissions by 80% below a 2010-2012 baseline by 2030, 90% by 2035, and 100% by 2040.⁵ The bill also provides that it is the policy of the State of Oregon for the retail electricity suppliers to rely on non-emitting power, that such electricity be generated in a manner that, to the maximum extent practicable, provides additional benefits in this state in the form of creating and sustaining meaningful living wage jobs, workforce equity, energy security and resiliency, and in a manner that minimizes burdens for environmental justice communities.⁶ Finally, this Commission is also charged with ensuring that electric companies demonstrate continual progress and are taking actions “as soon as practicable that facilitate rapid reduction of greenhouse gas emissions.”⁷

Procedurally, the Commission’s new rules regarding CEP acknowledgment provide that the Commission may either:

- (a) Acknowledge a CEP as filed;
- (b) Acknowledge a CEP with conditions; or
- (c) Not acknowledge the CEP and require that the utility revise and resubmit all or certain elements of the CEP within the procedural timeline directed in the order.⁸

NewSun has significant concerns that in failing to adequately meet the Commission’s IRP guidelines and the statutory CEP criteria, PGE does not present a viable path to meet the clean energy targets and therefore the Commission should not acknowledge this IRP/CEP without requiring PGE to revise and resubmit the CEP or at a minimum, conditioning its acknowledgement. These comments aim to prompt a more detailed analysis that clarifies the plan’s economic and technical feasibility, and to ensure it meets public interest requirements.

⁴ *Id.*
⁵ ORS 469A.410.
⁶ ORS 469A.405.
⁷ ORS 469A.415 (6).
⁸ OAR 860-027-0400(9).

Specifically New Sun recommends that Commission do the following:

- A. Decline IRP and CEP acknowledgement and direct PGE to revise and resubmit its CEP to reflect more economic and technically feasible transmission options.**
- B. Condition IRP approval on detailed analysis of transmission upgrades in future IRPs.**
- C. Direct PGE to model uncapped CBREs or up to 125% of CBRE potential.**
- D. Direct PGE to model distributed generation at the highest achievable potential.**
- E. Require that PGE plan to curtail thermal unit use overall for the benefit of Oregon communities and to match marketed GHG reduction goals of zero emissions company-wide by 2040.**
- F. Direct PGE to comply with Commission rules in providing draft avoided cost information in the same format as will be provided in final form following IRP acknowledgement.**

III. COMMENTS

NewSun is particularly concerned about the plan's economic and technical feasibility, specifically related to the timelines for significant transmission upgrades and insufficient modelling that does not present important avenues for achieving CEP goals. NewSun has also identified several portions of the plan incongruous with the public interest.

Ensuring the accuracy of this IRP is paramount to accomplishing mandates in HB 2021. To reach zero emissions by 2040, the majority of GHG emissions reductions must occur by 2030. That means that most of the reductions necessary to meet the 2030 target should be reflected in the action plan in this IRP.

PGE's mandate is to reduce emissions from its 8.1 million metric ton CO₂ equivalent ("MMTCO₂e") to only 1.62 by 2030, 0.81 by 2035, and zero by 2040.⁹ To help meet this target, PGE proposes to conduct one or more requests for proposals ("RFPs") for 66 MW of CBRE resources by 2026 and 155 MW of CBRE resources by 2030, 261 MWa of non-emitting resources each year through 2028 (1307 total MWa over 5 years) and forecasts a 944 MW

⁹ PGE Clean Energy Plan and Integrated Resource Plan 2023 at 90 (Errata filing Jun. 30, 2023) (hereinafter "PGE 2023 IRP").

summer, 827 MW winter 2028 capacity need.¹⁰ In total, PGE estimates it needs 3,000 to 4,000 MW in non-emitting resources and capacity to meet its 2030 target.¹¹ The schedule for this docket calendars IRP acknowledgment for January 25, 2024, meaning that PGE’s next IRP will not be due until January 2026.¹² leaving less than four years to acknowledge that IRP, issue one or more RFPs, negotiate, procure, and construct any additional resources to meet the 2030 target, and that’s assuming there are no delays or extensions.

There is simply not enough time to procure substantial additional resources based on that next IRP/CEP action plan in time to have them online by 2030. As such, it is extremely important for the Commission, Staff, and Stakeholders to devote additional time, resources, and effort now to ensure that this 2023 IRP/CEP is robust, technically feasible, in the public interest and calculated to reach that 2030 target. These comments aim to prompt the detailed analysis that meeting these targets will require.

A. PGE has not Demonstrated its Wyoming and Desert Southwest Transmission Proxies to be Economically or Technically Feasible by 2026

NewSun recommends that the Commission decline to acknowledge PGE’s IRP and CEP and require that PGE revise and resubmit its CEP to reflect economic and technically feasible transmission proxy options. PGE modeled two generic proxy transmission options that include transmission to Wyoming or the Desert Southwest, unlocking an equivalent amount of Wyoming wind or Nevada solar.¹³ PGE made those proxy transmission and equivalent generation resources available for model selection as early as 2026.¹⁴ Initially, the model selected 44 MW worth of the

¹⁰ CEP & IRP Refresh Portfolio Analysis Refresh Addendum at 28 (Errata filing Jul. 7, 2023) (hereinafter “PGE 2023 IRP Addendum”).

¹¹ *Id.* at 21.

¹² OAR 860-027-0400(3).

¹³ PGE 2023 IRP at 227-228.

¹⁴ *Id.* at 227.

Wyoming proxy in that first year (2026).¹⁵ However, with the filing of PGE’s addendum, the model selects 400 MW of Wyoming proxy and 153 MW of Nevada proxy both in 2029.¹⁶ PGE notes that these transmission products “could be met through transmission rights, partnership in projects currently being developed, and/or additional development on a longer-term time horizon.”¹⁷

These assumptions present significant timing concerns. PGE notes that the proxy resources are designed to “identify need for new transmission capacity that *could* become available” and that “[t]he years chosen for first availability of transmission proxies in portfolio modeling **do not necessarily represent an expectation of the time required to develop any specific transmission projects.**”¹⁸ This is concerning. If transmission rights or partnerships in existing projects do not materialize, it is highly unlikely that additional development in a new transmission expansion could be complete in 3 years by 2026 when these proxies are made available to the model or even in 6 years when they are selected. Any new transmission builds or resources that rely on new transmission builds should, by default, assume at least 15 years to be fully developed and brought online, but at a minimum, 10 years. While it may be reasonable to have these transmission proxy resource available for selection in the model to identify the need for potential additional transmission and associated resources, when reliance on those assumptions results in PGE under procuring other viable resources, it jeopardizes the feasibility of the plan.

Further, PGE has yet to explain how it derived the costs for those generic proxy resources and how those costs reflect general characteristics that may be found in the market. PGE points

¹⁵ PGE 2023 IRP at 288.

¹⁶ PGE 2023 IRP Addendum at 25.

¹⁷ PGE 2023 IRP at 227.

¹⁸ PGE Response to NewSun DR 006 (Attached as Attachment A) (emphasis added).

to a 2018 article in footnote 274 of the IRP as the source of its cost assumptions. That study, lists costs in Table 7 noting that:

The cost of electricity transmission can be substantially higher if substations are needed, and right-of-way costs have the potential to further markedly increase the cost of electricity transmission, with some recent transmission lines having full project costs that are as much as a factor of ten higher than the costs in Table 7.¹⁹

Therefore, it is still unclear why PGE believes WY and NV proxies best represent general market characteristics.

As such, NewSun recommends that the Commission decline to acknowledge PGE's IRP and CEP and require that PGE revise and resubmit its CEP to reflect economic and technically feasible transmission proxy options.

B. More Detailed Analysis of BPA Transmission Upgrades

NewSun recommends that the Commission host a workshop focused on transmission and condition any acknowledgment decision on PGE providing more detailed review and analysis of BPA transmission in its next IRP. NewSun appreciates that this IRP was PGE's first attempt to include transmission resources in portfolio modelling and to incorporate contractual transmission limitations into portfolio analysis. While this is an improvement over past IRPs, more detailed analysis of transmission would better inform the economic and technical feasibility of PGE's portfolio analysis and resource selection.

NewSun drew attention, in its Round 0 comments, to the assumptions PGE makes about 2016 to 2021 transmission service requests ("TSRs"). First, NewSun pointed out that the TSRs pointing at PGE's system are classified as potentially available in the IRP.²⁰ However, these

¹⁹ Relative costs of transporting electrical and chemical energy, Fadl H. Saadi, et al., *Energy and Environ. Sci.* 2018.

²⁰ Round 0 Comments of NewSun Energy LLC at 10 (Errata filing May 4, 2023) (hereinafter "NewSun Round 0 Comments").

TSRs might be diverted a different utility in the future so they may not necessarily be an accurate representation of the transmission available to PGE.

Second, PGE assumes that TSRs that are in study status are available on a conditional firm basis and TSRs that are confirmed are available as long-term firm service. This assumption is oversimplifying. In response, PGE agrees that this is a simplified assumption of reality, but believes it is the best available method to distinguish between long term and conditional firm requests.²¹ NewSun believes that there are better ways to estimate this going forward and looks forward to continued discussion and engagement on this topic with the Commission, PGE, and other stakeholders.

Finally, there are serious timing challenges associated with major BPA transmission upgrades for which the IRP does not account, and PGE’s response comments fail to resolve. Nearly all of BPA’s upgrades required to transmit power to Portland will cross public lands, and thus will trigger National Environmental Protection Act (“NEPA”) reviews, which are time and resource intensive.²² PGE also agrees that transmission modeling needs improvement going forward.²³ Accurate transmission assumptions are integral to IRP’s technical feasibility and an achievable portfolio. PGE’s IRP should more specifically describe how PGE plans to work with BPA, invest in and facilitate transmission improvements over the BPA-PGE interface, and contribute to future projects on the BPA system. As such, NewSun recommends that the Commission host a workshop focused on transmission and condition any acknowledgment on more detailed transmission analysis in future IRPs.

²¹ Round 0 Comments: PGE Response at 36 (Errata filing May 31, 2023) (hereinafter “PGE Reply Comments”).

²² New Sun Round 0 Comments at 13.

²³ PGE Reply Comments at 36.

C. PGE has not Adequately Addressed CBRE Technical Achievable Potential in its Modeling.

NewSun recommends that the Commission direct PGE to model a portfolio with uncapped CBRE potential to mitigate the risk that PGE under-forecasted the amount of CBRE potential or the community benefit they provide. Such a portfolio would offer a useful tool against which to compare other portfolios cost and risks, especially ones that rely on long-distance transmission that may not materialize in a timely fashion. PGE highlighted the high technical feasibility and cost benefit from community based renewable CBREs.²⁴ Despite CBREs' numerous attributes, PGE has run models for up to 100% of CBRE achievable potential, or 155 MW, but not higher.²⁵ PGE explained that 155 MW "is the assessment of the resource potential and . . . the maximum amount that PGE considers realistic and informative."²⁶ PGE clarified that it determined what is realistic and informative by considering feedback from community participants, defined CBRE proxy resources to include in the portfolio, and quantitative assessments of leveraging multiple resources and lab studies.²⁷ NewSun appreciates PGE's transparency in its determination of 155MW but fails to see how these factors necessarily preclude a model the projects more than 100% of CBRE potential.

PGE explained further that it modeled CRBE's technical achievable potential up to 100% like it modeled other portfolios such as pumped hydro and energy efficiency.²⁸ However, these resources do not enhance community benefits like CBREs. PGE should develop interim

²⁴ PGE 2023 IRP at 273.

²⁵ *Id.*

²⁶ PGE Reply Comments at 53.

²⁷ PGE response to NewSun Energy Data Request 005 (Attached as Attachment A) (emphasis added).

²⁸ *Id.*

community benefits indicators (“CBIs”) to inform CBRE analysis.²⁹ The CBIs should address the following topic areas:

- Resilience (system and community)
- Health and community well-being
- Environmental impacts
- Energy Equity (distributional and intergenerational equity), and
- Economic impacts³⁰

NewSun is concerned that PGE did not account for all these topic areas in its CBRE modelling and further there are likely a number of other project types that could provide these community benefits besides the three CBRE resources PGE reviewed. In addition, CBREs can alleviate transmission challenges—PGE acknowledges that CBREs are a net positive in “a transmission constrained system.”³¹ Considering the uncertainty involved in transmission proxies, running a portfolio to include uncapped (or at least a higher percentage of) CBREs could present a more efficient path to achieve CEP targets, or at least be an informative tool to compare against the costs and risks of other portfolios.

Given this rationale, NewSun recommends the Commission direct PGE to model uncapped CBREs or at least up to some percentage threshold above what PGE determined to be achievable (125%).

D. PGE Should Run a Model for Distributed Energy Resources (“DERs”) up to their Achievable Potential.

Similarly, NewSun recommends that the Commission direct PGE to model a portfolio with DERs up to their fullest potential to mitigate the risk that PGE under-forecasted the pace of DER adoption. NewSun requested PGE run a portfolio for distributed generation resources

²⁹ *In re Pub. Util. Comm’n of Or.; Near-term guidance on Roadmap Acknowledgement and Community Lens Analysis the First Clean Energy Plans* Docket No. UM 2225, Order No. 22-390, Appendix A at 30 (Oct. 25, 2022).

³⁰ *Id.*

³¹ PGE 2023 IRP at 273.

(“DERs”). unconstrained by cost effectiveness.³² PGE explained that it determined technical potential for DERs using “customer adoption factors,” which include cost effectiveness as a consideration, but not the sole variable.³³ So PGE could not run a model unconstrained by cost.³⁴ NewSun appreciates the clarification about methodology, and although the consumer factors may account for more than cost, PGE has not fully addressed the NewSun’s question. NewSun wants to ascertain costs and benefits of DERs at their fullest potential, regardless of consumer factors.

NewSun recommends the Commission direct PGE to run a model that considers DERs up to the achievable potential, irrespective of any other factors to gain a full picture of the cost and how it compares with other proposed upgrades and proxy resources.

E. PGE Should Curtail Overall Use of Thermal Units for the Benefit of Local Communities.

NewSun recommends that the Commission decline to acknowledge PGE’s CEP because the public interest is not served by PGE’s plan to continue operating fossil units located in this state for out-of-state sales. The Commission must consider whether actions are in the public interest PGE’s IRP does not currently meet public interest standards. Several factors dictate whether the plan is in the public interest, including: “any reduction of greenhouse gas emissions that is expected through the plan, and any related environmental or health benefits.”³⁵

PGE operates five thermal units in Oregon— power generated by these units is either provided to rate payers or sold out of state.³⁶ Despite PGE’s projections that it will cease selling power from thermal units to rate payers by 2040, its projections show that it will continue using

³² NewSun Round 0 Comments at 9.

³³ PGE Reply Comments at 54.

³⁴ *Id.*

³⁵ ORS 469A.420(2).

³⁶ PGE 2023 IRP at 14.

thermal units for sales out of state.³⁷ This continued thermal unit use is antithetical to PGE's marketed GHG reduction goals. PGE has claimed both in its IRP and its marketing that it aims to achieve net zero emission, company wide by 2040.³⁸ Not only is this misleading to consumers who believe in PGE's net zero goals, but also PGE's plans to operate these thermal units to sell power out of state carries serious public interest implications.

Operating these thermal units has a local impact. These plants affect the Oregonians who live in neighboring communities, impacting their health and environment. PGE will celebrate GHG reductions from consumption from its ratepayers while select communities in this state still shoulder the burdens thermal unit operation places on them. Further, continued thermal unit operation is fundamentally out of step with the spirit of HB 2021. Reliance on thermal units in and out of state also monopolizes valuable transmission—using these units less can free up transmission to deliver or balance variable and non-emitting resources as discussed above. Finally, instead of continuing to run fossil units for out of state sales, Oregonians should be the first to benefit. The capacity of these thermal units should be put on reserve for ratepayer use in case of a reliability or extreme weather event. This would increase resiliency and bolster the public interest.

Overall, selling power from thermal units out state is contrary to the public interest. The Commission should decline to acknowledge PGE's CEP and require that PGE refile its CEP consistent with a plan to curtail the use of fossil units to avoid local impacts, free up transmission, and increase resiliency.

³⁷ CEP Data Template, Annual GHG Impacts of Actions Tab, *See* Market Sales (metric tons).

³⁸ PGE 2023 IRP at 10.

F. PGE Failed to Provide Draft Avoided Cost Information Required under OAR 860-029-0080(3).

NewSun recommends that the Commission decline to acknowledge PGE's IRP until PGE provides the draft avoided cost information required under OAR 860-029-0080(3) and the Commission should condition any acknowledgement on PGE providing the same in future IRPs. NewSun urged PGE to provide draft avoided cost information at the time it files its IRP, according to OAR 860-029-0080(3).³⁹ PGE claimed that it satisfied the requirement because: "Table 6 details the different components of the avoided costs as used in Schedule 201 and where they can either be *found* or *developed* based on the information within the CEP/IRP."⁴⁰ However, this information is not the same thing as a draft of avoided costs.

Stakeholders should not be required to *find* or *develop* information necessary for the calculation of avoided costs. To ascertain avoided costs using this information would require extensive time and calculation on an individual's part. However, the Commission's rule vests that responsibility with the utility: "Each public utility must file with the Commission draft avoided-cost information at the time it files its integrated resource plan and file final avoided-cost information within 30 days of a Commission decision of acknowledgement of the integrated resource plan to be effective 30 days after filing." The information required to be provided in draft form at the time of IRP filing should be identical in structure and format to that which is provided in final form within 30 days after the Commission's acknowledgement decision. PGE's response is insufficient to meet the requirement and places an unfair burden on interested parties. As such, the Commission should direct PGE to file the appropriate draft avoided costs prices,

³⁹ NewSun Round 0 Comments at 14.

⁴⁰ PGE Reply Comments at 60 (emphasis added).

decline to acknowledge PGE's IRP until they have done so, and condition any acknowledgement decision on PGE providing the same in future IRPs.

IV. CONCLUSION

Achieving the mandates set by HB 2021 hinges on the successful formulation of this IRP. Considering these serious implications, NewSun urges the Commission to make IRP acknowledgment contingent on PGE's implementation of the above clarifications and changes.

Dated this 27th day of July 2023.

Respectfully submitted,

NEWSUN ENERGY LLC



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Attachment A

*In the matter of Portland General Electric Company,
2023 Integrated Resource Plan and Clean Energy Plan,*

Docket No. LC 80

PGE Response to NewSun DR 005 and 006

July 24, 2023

To: Marie Barlow
NewSun Energy LLC

From: Erin Apperson
Assistant General Counsel III

Portland General Electric Company
LC 80
PGE Response to NewSun Energy Data Request 005
Dated July 17, 2023

Request:

See PGE's Addendum filed July 7, 2023 page 22. PGE notes that the full potential of 155 MW of Community-Based Renewable Energy is added and the potential for CBREs to lower costs in a transmissions-constrained environment.

1. How did PGE determine that 155 MW is the maximum amount of Community Based Renewable Energy projects that is realistic and informative in PGE's portfolio analysis?
2. Has PGE evaluated the effect of adding more than 155 MW of Community Based Renewable Energy projects? If so, please explain its effect on the overall portfolio.

Response:

1. As stated in Section 7.2 of the CEP/IRP, PGE conducted a community lens potential study that identified 155 MW of technical achievable CBRE potential for inclusion in portfolio analysis in this first CEP/IRP. The high-level steps PGE followed to determine this amount for inclusion in portfolio analysis were:
 - a. Review of the literature and of past feedback from community participants gathered through the Distribution System Planning process
 - b. Define the proxy CBRE resource types for inclusion in portfolio analysis (Standalone community-scale solar, community resiliency microgrids, and in-conduit hydro)
 - c. Develop quantitative assessments leveraging multiple sources, including PGE's AdopDER model, published municipal climate action targets, Energy Trust project pipelines, and published national lab studies such as the Oak Ridge National Lab in-conduit hydropower potential study.¹

Each resource's MW buildup is generated following this process and represents PGE's best assessment of a realistic and informative CBRE potential, given the specific modeling delineations discussed in Section 7.2 of the CEP/IRP. As PGE gains more experience with these new resource types, we expect to revisit and refine this process, as described in section 7.2.4 of the CEP/IRP.

¹ In-conduit hydropower potential study from Oak Ridge National Lab is available at: <https://info.ornl.gov/sites/publications/Files/Pub176069.pdf>

2. As noted in subpart 1, PGE has identified 155 MW as the technical achievable potential of CBREs. Since the technical achievable potential represents the maximum potential that could be realistically acquired based on this analysis, PGE has not evaluated a portfolio with more than 155 MW of CBRE. This is consistent with other portfolios such as pumped storage hydro, and energy efficiency and demand response portfolios, which are also limited by identified resource potential.

July 24, 2023

To: Marie Barlow
NewSun Energy LLC

From: Erin Apperson
Assistant General Counsel III

Portland General Electric Company
LC 80
PGE Response to NewSun Energy Data Request 006
Dated July 17, 2023

Request:

See PGE's Addendum filed July 7, 2023 page 25, Table 8. On what basis did PGE determine that the Wyoming and Nevada proxy transmission expansion projects would be able to be online and operational and capable of delivering electricity to PGE's service territory by 2029, less than six years from the filing of the IRP/CEP?

Response:

The Wyoming and Nevada transmission expansion proxy resources are made available as early as 2026 in select portfolios. The proxy resources are designed to identify need for new transmission capacity that could become available through partnerships in projects currently being developed or through additional development on a longer-term time horizon. The years chosen for first availability of transmission proxies in portfolio modeling do not necessarily represent an expectation of the time required to develop any specific transmission projects.