

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2059

In the Matter of

PACIFICORP dba PACIFIC POWER,

Application for Approval of 2020 All-Source
Request for Proposals.

Renewable Northwest's
Comments on Staff Report

June 26, 2020

I. INTRODUCTION

Renewable Northwest is grateful to the Oregon Public Utility Commission (“the Commission” or “PUC”) for the opportunity to submit these comments on Staff’s June 22, 2020 Report (“Staff Report”) regarding PacifiCorp’s proposed 2020 All-Source Request for Proposals (“RFP”). We agree with Staff that, overall, “PacifiCorp’s most recent version of the Draft RFP ... can be employed in a generally fair and open competitive procurement process that could identify least-cost, least-risk assets, which in turn might confer benefits to ratepayers.”¹ We reiterate that one of those expected benefits is the potential for significant reductions in PacifiCorp’s system-wide greenhouse gas emissions consistent with the public policy of the State of Oregon as expressed in Executive Order No. 20-04.² Achieving greenhouse gas emission reductions is an important consideration for the Commission as it reviews this RFP, and we appreciate the attention the Commission has already paid to the issue in Order No. 20-186.³

We also join Staff in “thank[ing] PacifiCorp for its responsiveness to concerns expressed by commenters, and recommended improvements from the IE and Staff.”⁴ We appreciate PacifiCorp’s responses to many of the issues raised in our May 22, 2020 Initial Comments (“Initial Comments”), including both clarifications presented in PacifiCorp’s June 1, 2020 Reply Comments (“PacifiCorp Reply”) and amendments to PacifiCorp’s most recent Draft RFP. That said, we do have some remaining comments and concerns; in particular, we remain concerned

¹ Staff Report at 3.

² See Renewable Northwest’s Initial Comments at 2-3 (May 22, 2020) (citing and quoting Executive Order No. 20-04).

³ Oregon Public Utility Commission, Docket No. LC 70, Order No. 20-186 at 19 (Jun. 8, 2020) (citing Executive Order No. 20-04).

⁴ Staff Report at 4.

that the January 31, 2020 Interconnection Request cutoff date unnecessarily limits competition in the RFP.

In these comments, we first offer additional thoughts on PacifiCorp's January 31 cutoff date, responding to PacifiCorp and Staff and further supporting our May 22, 2020 proposal to allow additional resources that will not be eligible for PacifiCorp's Transition Cluster to participate in this RFP. Second, we address one new issue from PacifiCorp's most recent revised RFP, a concerning modification to the company's proposed minimum eligibility requirement for site control. Third, we walk through the changes to PacifiCorp's Draft RFP and form Power Purchase Agreements ("PPA") that we proposed in our Initial Comments, discussing PacifiCorp's responses and providing updated thoughts on each issue. Finally, we conclude by reiterating our strong overall support for this RFP, noting that the primary objective of these comments is to help ensure that the RFP results in a robust procurement yielding the greatest possible customer benefits and greenhouse gas emission reductions.

II. COMMENTS

A. Removing the January 31 Cutoff Is Feasible and Will Significantly Increase Competition

1. Renewable Northwest's May 22 Proposal

In our Initial Comments, Renewable Northwest discussed the interaction between PacifiCorp's Interconnection Queue Reform proposal at the Federal Energy Regulatory Commission ("FERC") and this RFP.⁵ In particular, we explained our opposition at FERC to PacifiCorp's proposal that only resources with pending interconnection requests as of January 31, 2020 could participate in the company's proposed Transition Cluster.⁶ Specifically, because PacifiCorp offered no advance notice of the January 31 cutoff date, many resources -- including some that were being developed based on PacifiCorp's 2019 IRP to meet PacifiCorp's identified needs and to compete in this RFP -- would be arbitrarily denied access to the Transition Cluster.⁷ This potential outcome was particularly concerning given PacifiCorp's proposal to condition a resource's eligibility for the RFP on its having a submitted interconnection request as of January 31-- essentially, conditioning eligibility for the RFP on eligibility for the Transition Cluster. Because FERC accepted PacifiCorp's January 31 cutoff, the only avenue for post-January 31 resources to participate in the RFP is for state Commissions to untether the RFP from

⁵ Initial Comments at 3-5.

⁶ *Id.* at 3-4.

⁷ *Id.*

PacifiCorp's Transition Cluster study and condition approval of the RFP on elimination of the January 31 cutoff. When we filed our Initial Comments, the January 31 cutoff prevented nearly 6,000 MW of resources then in the interconnection queue from participating in this RFP.⁸

Staff's May 22, 2020 Comments added some detail to those resources that could be available if the Commission were to push back the January 31 cutoff date, broadly observing that "a later cut-off date could allow a more diverse set of competitive bids to be submitted in each locational bubble" designed by PacifiCorp to reflect the ability of the company's transmission system to interconnect new resources at various locations.⁹ Staff specifically observed that "a different cut-off date could allow, for example, a second wind resource to bid in the Southern Oregon bubble, potentially providing some competition for that resource type in that location" and that "[a] later cut- off date could also allow two solar plus battery resources to bid in the Goshen bubble, where there are no potential bidders of that type as of January 31."¹⁰

To resolve the arbitrary January 31 cutoff and allow additional resources to compete in the RFP, Renewable Northwest proposed an alternative route for post-January 31 resources to participate:

- Allow projects that submit(ted) interconnection requests after January 31, 2020 to bid into the RFP;
- Apply PacifiCorp's proposed principle that "the cost for any direct assigned and transmission network upgrades associated with the interconnection of a proposed project to PacifiCorp's transmission system will not be included in the initial shortlist price evaluation" to all projects for purposes of IRP modeling and Initial Shortlist development;
- Allow all projects on the Initial Shortlist to proceed through the non-interconnection-related elements of Phase II, including Resource Capacity Factor Verification and Storage Performance, Contract Development, and Bid Update;
- For purposes of Contract Development, allow bidders who have not gone through the interconnection study process either: (a) to negotiate an agreement contingent on upgrade costs coming in below a certain threshold; or (b) to negotiate an agreement whereby the bidder assumes the risks related to upgrade costs;
- For purposes of the Bid Update, allow bidders who have not gone through the study process to submit a reasonable estimate of expected upgrade costs to be

⁸ Interconnection queue data accessed on OASIS at 11:44AM on May 21, 2020.

⁹ Staff Comments at 7.

¹⁰ *Id.*

used in development of the Final Shortlist. This update may be based in part on information these bidders have been able to obtain through PacifiCorp's non-binding Informational Interconnection Study process.¹¹

2. PacifiCorp's Response to Renewable Northwest's Proposal

In their June 1, 2020 Reply Comments, PacifiCorp opposed Renewable Northwest's proposal for post-January 31 resources.¹² PacifiCorp wrote that the company's RFP proposal was designed "to ensure the maximum number of parties would have the opportunity to submit bids that align with PacifiCorp's 2019 IRP action plan," that allowing post-January 31 resources to bid would create an "'apples-to-oranges' construct," that the resulting timeline could "put significant pressure on developers," and that "it is unclear how any bidder could provide a reasonable estimate without knowing the results of the initial transition cluster study."¹³ Responses to each of these points follow.

On the first point, Renewable Northwest's proposal appears to better "ensure the maximum number of parties ... have the opportunity to submit bids that align with PacifiCorp's 2019 IRP action plan" than PacifiCorp's proposal does. True, the IRP action plan contemplates aligning the RFP with the result of PacifiCorp's queue reform proposal at FERC.¹⁴ But nothing in the IRP action plan suggests that the revised interconnection queue process should serve as a *limitation* on eligible bidders; rather, the focus of both the IRP and the queue-reform proposal was facilitating more competition. Indeed, throughout the IRP, to the extent Renewable Northwest's comments addressed the queue-reform process, they focused on both "minimiz[ing] the likelihood of negative interconnection-related impacts on the competitiveness of the RFP"¹⁵ and aligning the RFP with queue reform.¹⁶ Our proposal in this docket seeks to continue upholding those two values while offering the opportunity for additional resources to participate in the RFP.

With respect to PacifiCorp's "apples-to-oranges" issue, the contractual mechanisms included in Renewable Northwest's proposal would appear to mitigate that concern. In particular, if a bidder is willing to assume the risks related to a project's unknown upgrade costs, it is unclear how there would be a material difference to PacifiCorp or its customers between that project and

¹¹ Initial Comments at 4-5.

¹² PacifiCorp Reply at 19.

¹³ *Id.*

¹⁴ See PacifiCorp 2019 IRP at 276-77, Table 9.1, item 2b.

¹⁵ Oregon Public Utility Commission, Docket No. LC 70, Initial Comments of Renewable Northwest at 15 (Jan. 10, 2020); see also *id.* at 14 (discussing how "interconnection was a factor in the Commission's decision not to acknowledge PacifiCorp's shortlist for the 2017R RFP").

¹⁶ Oregon Public Utility Commission, Docket No. LC 70, Final Comments of Renewable Northwest at 2-6 (Mar. 4, 2020).

another project with known upgrade costs. To PacifiCorp and its customers, comparing those projects is more in the nature of an “apples-to-apples” approach.

On the subject of developer pressure, different developers are working on different projects with different development timelines. We appreciate PacifiCorp’s and the Commission’s efforts to keep the IRP and RFP process moving at a faster-than-usual pace to avoid potential back-end pressures that we highlighted in our IRP comments.¹⁷ At the same time, some developers may be comfortable operating within a tighter timeframe. The ultimate goal of fostering a competitive solicitation that results in a least-cost, least-risk portfolio of resources is best served by a process that allows projects at all points on the time-pressure spectrum to participate, provided they can meet PacifiCorp’s ultimate commercial-operation-date requirement. Renewable Northwest vetted our proposal for post-January 31 resources with a range of developers, and we are confident that the proposal is reasonable from the developers’ perspective.

Finally, on the subject of “how any bidder could provide a reasonable estimate without knowing the results of the initial transition cluster study,” in our Initial Comments we mentioned PacifiCorp’s Informational Interconnection Study process as one option; PacifiCorp has not explained in this docket why that process would not help to provide a reasonable estimate. Perhaps more importantly, however, the cutoff is an unnecessarily blunt instrument for dealing with this concern. Alternative options include: giving PacifiCorp the opportunity (subject to IE and Commission review) to determine whether a bidder’s upgrade cost estimate is reasonable, providing acceptable forms of evidence to support a reasonable estimate (e.g. the results of an Informational Interconnection Study, relevant Transition Cluster study results relating to a different project), or addressing this concern contractually (e.g. through a bidder’s agreement to absorb upgrade costs).

3. The Independent Evaluator’s Response to the January 31 Cutoff

On June 10, 2020, the Independent Evaluator (“IE”) filed its report, which “recommend[ed] that the cut-off date for this RFP not be extended beyond the cutoff date for participation in the Transition Cluster Study, and that bidders not be allowed to conduct cost contingent negotiations.”¹⁸ The IE specifically pointed to “timing constraints which would result in delaying the bid submittal deadline for interconnection request reasons,” and concluded that “PA believes it is not feasible to extend the deadline without impacting resource CODs.”

¹⁷ See *id.* at 6.

¹⁸ Independent Evaluator’s Report at 14, section 3.2.1 (June 10, 2020).

Renewable Northwest believes the IE may be mistaken about our proposal, as we have not proposed “delaying the bid submittal deadline” in any way; we have only proposed removing the January 31 cutoff date and suggested how post-January 31 projects may be able to participate in the RFP alongside those projects participating in the Transition Cluster. As to resource CODs, we have addressed that point above. And on one further note, Renewable Northwest was unable to identify any support or rationale for the IE’s opposition to cost contingent negotiations.¹⁹

On the other hand, the IE report also “recognizes the inherent limiting effect of the cut-off date, and the potential for it to limit the ability of highly valuable resources to participate in the RFP.”

²⁰ Renewable Northwest’s proposal would remove that unnecessary limit and allow those potential highly valuable resources to participate in the RFP.

4. One Other Possibility from the Independent Evaluator

To address the cutoff-date issue, the IE report also “recommends that the Commission consider requesting that PacifiCorp consider the possibility of a second RFP in late 2021, while accordingly being conservative in accepting bids in this RFP, recognizing there would remain sufficient time for resources in a 2021 RFP to achieve operations by PacifiCorp’s December 31, 2024 deadline.” This proposal merits a few responses.

First, the IE’s suggestion that “a second RFP in late 2021” would leave “sufficient time for resources ... to achieve operations by PacifiCorp’s December 31, 2024 deadline” offers additional evidence undercutting both PacifiCorp’s and the IE’s concerns about post-January 31 projects’ ability to meet PacifiCorp’s required commercial operation date in the context of this RFP. It is unclear why post-January 31 resources in *this* RFP would have difficulty meeting a December 31, 2024 commercial operation date while the same resources in a late-2021 RFP could meet that same commercial operation date.

Second, Renewable Northwest has been unable to identify why the IE’s proposal would have to be either/or as opposed to both/and. In other words, it is possible that the best way to bring the most economical resources onto PacifiCorp’s system would be to hold a second RFP in late 2021 *without* being conservative in accepting bids in this RFP. To sum up this point, we would support a 2021 RFP based on our understanding of the current market for renewable resources in the western United States combined with a need for dramatic energy system transformation to achieve emissions goals and mitigate climate change; we would not and do not, however, support

¹⁹ Nor, for that matter, did either PacifiCorp or the IE address the prospect of contracts where bidders assume responsibility for unknown upgrade costs.

²⁰ *Id.*

a conservative bid cutoff in this RFP, as that approach runs counter to the market and, potentially, to Oregon policy.

Third, when Renewable Northwest asked PacifiCorp at a public input meeting relating to the company's 2021 IRP about the prospect of a 2021 RFP, the company's response unsurprisingly suggested that the question of a late-2021 RFP is more properly one for the 2021 IRP process to answer. As noted above, Renewable Northwest would certainly welcome a 2021 RFP based on our understanding of current market dynamics and the need for aggressive decarbonization. And we have high and well-founded hopes that the 2021 IRP process will demonstrate the potential for more economic coal retirements and renewable resource additions. But we are sympathetic to the company's position that the 2021 IRP is the proper venue for determining the bounds of a 2021 RFP -- provided that there is a sufficiently robust opportunity for competition in this RFP. Our proposal for post-January 31 resources offers just that opportunity.

B. One New Concern in Most Recent Draft RFP

Renewable Northwest has identified new, potentially harmful language regarding the company's minimum eligibility requirement for site control in the RFP; we understand that PacifiCorp plans to remove the new language, but in the alternative we request that the Commission direct PacifiCorp to do so.

PacifiCorp's original draft RFP required "documentation of site control for the project excluding right-of-way or easements for transmission, roads, or access to the site" as a minimum eligibility requirement for bidders.²¹ The company's most recent draft RFP, filed with the Utah Public Service Commission on June 18, 2020 and with this Commission on June 23, 2020, includes a material change to that provision: "documentation of site control for the project including the facility and gen-tie line associated with the facility but excluding right-of-way or easements for interconnection or transmission, roads, or access to the site."²² This new language is concerning for three reasons.

First, the language appears to be internally inconsistent. Specifically, it is unclear how one can demonstrate site control "including the ... gen-tie line" but "excluding right-of-way or easements for interconnection or transmission" given that the gen-tie line is typically considered an interconnection facility.

²¹ Page 16

²² Page 17

Second, the language in the June 18 draft RFP includes a footnote that reads “[s]ite control for the 2020AS RFP is defined in PacifiCorp Transmission’s OATT.”²³ PacifiCorp’s Open Access Transmission Tariff, or OATT, defines site control as follows:

Site Control shall mean the exclusive land right to develop, construct, operate, and maintain the Generating Facility over the term of expected operation of the Generating Facility. Site Control may be demonstrated by documentation establishing: (1) ownership of, a leasehold interest in, or a right to develop a site of sufficient size to construct and operate the Generating Facility; (2) an option to purchase or acquire a leasehold interest in a site of sufficient size to construct and operate the Generating Facility; or (3) any other documentation that clearly demonstrates the right of the Interconnection Customer to exclusively occupy a site of sufficient size to construct and operate the Generating Facility. Site Control for any co-located project is demonstrated by a contract or other agreement demonstrating shared land use for all co-located projects that meet the aforementioned provisions of this Site Control definition.²⁴

The OATT also defines Generating Facility as follows:

Generating Facility shall mean Interconnection Customer's device for the production and/or storage for later injection of electricity identified in the Interconnection Request, but shall not include the Interconnection Customer's Interconnection Facilities.²⁵

Again, then, the OATT excludes interconnection facilities such as gen-tie lines from the definition of site control. Consistency within the RFP and between the RFP and the OATT counsel in favor of removing the gen-tie line from the site-control requirement.

Third and finally, it is possible that adding a new requirement at this point in the process -- especially a new requirement that is inconsistent enough with other RFP elements that it appears to have been added in error -- could disqualify bidders and harm competition in the RFP. For all

²³ *Id.* n14.

²⁴ This language is from section IV.36 (p.12) of the OATT recently approved by FERC as part of PacifiCorp’s queue reform proposal. *See* Federal Energy Regulatory Commission Docket No. ER20-924, PacifiCorp’s Revisions to Generator Interconnection Procedures (Jan. 31, 2020), *available at* https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14832392. Language similarly limiting the definition of site control to a Generating Facility similarly appears in the OATT currently available via OASIS, also at section IV.36 (p. 136).

²⁵ This language is identical in both the recently approved OATT at IV.36 (p.5) and the OATT currently available via OASIS at IV.36 (p. 129).

of these reasons, we recommend that the Commission direct PacifiCorp to remove the gen-tie line from the required documentation of site control if PacifiCorp does not remove that language itself.

C. Responses to PacifiCorp Regarding Proposed RFP and PPA Changes

In this section, we address PacifiCorp's responses to the recommendations presented in our Initial Comments.

1. Update RFP Language To Clarify that Greenfield Projects Include Expansions (RFP Section 1(B))

In our Initial Comments, Renewable Northwest recommended that PacifiCorp update its RFP to reflect the company's clarification from its Q & A document regarding whether and when expansions of existing projects constitute greenfield resources eligible for the RFP. We appreciate that PacifiCorp has made the requested change.

2. Provide Additional Clarity Regarding Pumped Hydro Storage (RFP Section 1(E)(2))

Renewable Northwest recommended that PacifiCorp provide a form tolling agreement for pumped hydro storage projects. We appreciate that PacifiCorp not only made this change but also clarified how that form tolling agreement will interact with non-price scoring for pumped hydro storage projects.

Our Initial Comments also raised the question of the maximum term of years for pumped hydro storage projects, recommending a figure greater than PacifiCorp's general 25-year preference due to these projects' long useful life. In response, PacifiCorp presented several risks to support a 25-year maximum for pumped storage.²⁶ We acknowledge those risks but encourage the Commission to weigh them against the potential benefits to PacifiCorp's customers -- and to regional resource diversity -- of spreading the costs associated with pumped storage projects across a time period that better reflects the projects' useful life.

²⁶ PacifiCorp Reply at 13.

3. Modify Bid Fees for Greater Flexibility Regarding Contract Structure (RFP Section 3(G))

Renewable Northwest recommended that PacifiCorp add more flexibility to its bid fee system, allowing resources with different contract structures to count as bid alternatives rather than new base bids in order to promote resource diversity and a least-cost, least-risk Final Shortlist. PacifiCorp opposes this change on the bases that its bid fee system has fostered competition in the past and that different contract structures are more difficult to assess than the physical differences that typically underlie bid alternatives.²⁷ Because this RFP has such significant potential to attract hybrid projects with more potential physical and contract permutations, we continue to encourage the company to offer more flexibility as to bid fees.

4. Provide Additional Clarity Regarding Site Control Requirements (RFP Section 3(I)(29))

Renewable Northwest requested clarification as to what evidence PacifiCorp would accept to demonstrate site control. With the exception of the new concern discussed above in section B, we appreciate PacifiCorp's amendments to add clarity to the definition of site control in alignment with the company's OATT.

5. Establish Standards for Consistency between Bid and Interconnection Request (RFP Section 3(I)(31))

Renewable Northwest requested that PacifiCorp establish clear standards for what constitutes consistency between an RFP bid and an interconnection request. We appreciate that the company has provided clarity regarding both substance and process on this point, as well as additional flexibility.

6. Modify Resource Data Requirements (RFP Section 5(B))

Renewable Northwest requested that PacifiCorp clarify that it will accept satellite data regarding solar irradiance and in-house (rather than third-party) performance reports, provided those reports are based on transparent methodology acceptable to and replicable by the company. We appreciate the company's revisions to the RFP on both points.

²⁷ PacifiCorp Reply at 3.

7. Clarify Requirements re: Third-Party Transmission (RFP Section 5(D))

Renewable Northwest requested additional clarity as to what evidence would be acceptable to PacifiCorp regarding the availability of third-party transmission service. We appreciate that the company has provided this additional clarification.

8. Consider Allowing Bids Using PacifiCorp's Colstrip Transmission System ("CTS") Rights (Q & A)

Renewable Northwest recommended both that the Commission encourage PacifiCorp to make its existing CTS rights available to bidders to the extent feasible and that PacifiCorp work with the Commission and stakeholders to explore how CTS rights might be used in this or future RFPs. PacifiCorp responded that its "contracted transmission service is committed to its Colstrip generation resources, which per the 2019 IRP are planned to remain in service through 2027."²⁸ We recognize that the current planned retirement date for PacifiCorp's Colstrip resources is 2027 but also that the company has explored earlier exits in the past and has committed to continuing to study accelerated coal retirements in the 2021 IRP cycle. Accordingly we do not view the 2027 date as set in stone. While we acknowledge there may be a misalignment between PacifiCorp's CTS rights and the commercial operation date in this RFP, we continue to encourage the company to work with the Commission and stakeholders to explore how the company might use those rights should the Colstrip units retire earlier than currently planned.

9. Update the Definitions of Qualifying Institution & Storage Price (PPA Section 1.1)

Renewable Northwest recommended that the definition of Qualifying Institutions not be limited to United States banks in order to allow for more financing options. We appreciate that PacifiCorp has extended the definition to apply to Canadian banks as well.

Renewable Northwest also recommended that PacifiCorp either update the RFP to apply consistent units for battery storage resources throughout the RFP or clarify the company's reason for using different units. We appreciate that PacifiCorp has made the requested update.

10. Clarify Upgrade Responsibilities for Network Resources (PPA Section 4.2.2)

Renewable Northwest recommended that PacifiCorp clarify in the form PPA its sole responsibility for upgrade costs related to Network Resources. In its Reply Comments,

²⁸ PacifiCorp Reply at 4.

PacifiCorp clarified that the company “will be responsible for these costs, up to a certain maximum amount as will be determined between PacifiCorp and bidder and stated in the PPA.”²⁹ Should costs exceed that maximum amount, PacifiCorp will have an option to terminate the PPA. Renewable Northwest appreciates the clarification, which confirms our original understanding.

11. Allow Security To Serve as a Temporary Limit on Liability (PPA Section 8.7)

Renewable Northwest recommended that PacifiCorp and the Commission consider allowing posted security to serve as a limitation of liability until the Commercial Operation Date. PacifiCorp opposes this change and asserts that the pro forma PPA appropriately allocates risk among the company and bidders. We encourage the company to consider revisiting this provision in individual negotiations with selected bidders as appropriate.

12. Amend the Definition of Force Majeure To Include Epidemic (PPA Section 14.1)

Renewable Northwest requested the addition of “epidemic” or some similar term to the list of examples of Force Majeure events in the pro forma PPA. We appreciate PacifiCorp’s addition of the term “global epidemic” to the list.

13. Expand Allowed Successors and Assigns To Include Qualified Transferee (PPA Section 21)

Renewable Northwest recommended that the pro forma PPA allow assignment to a “Qualified Transferee”, to be defined as a party meeting certain standards regarding experience and creditworthiness. PacifiCorp opposes this change in the pro forma PPA but expresses a willingness to negotiate with bidders. We encourage the company to negotiate this provision with selected bidders as appropriate.

14. Modify Battery Storage Availability from 98% to 95% (PPA Exhibit K)

Renewable Northwest recommended that PacifiCorp modify its required availability for battery storage resources from 98% to 95% to encourage more bids with storage components. We appreciate that the company made the requested change.

²⁹ PacifiCorp Reply at 14.

III. CONCLUSION

Renewable Northwest appreciates PacifiCorp's, Staff's, the IE's, and other stakeholders' engagement in this docket. In particular, we appreciate the company's responses to many of the comments and concerns we raised in our Initial Comments. This RFP has the potential to be a watershed moment for PacifiCorp, the beginning of the large-scale transformation of its system to one that relies on diverse renewable resources and storage, resulting in customer savings and needed emission reductions -- the company's "bold vision ... for a future where energy is delivered affordably, reliably and without greenhouse gas emissions."³⁰ To maximize those benefits will require competition among as robust as possible a resource pool; to that end, we recommend the Commission approve PacifiCorp's RFP subject to elimination of the January 31 cutoff discussed above and revision of the minimum eligibility requirement for site control.

Respectfully submitted this 26th day of June, 2020,

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³⁰ PacifiCorp 2019 IRP at 1.