

**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 Independent Evaluator's
Report

December 4, 2020

Renewable Northwest's Comments on Independent Evaluator's Report

Renewable Northwest is grateful to the Oregon Public Utility Commission ("the Commission") for the opportunity to submit these comments on the Independent Evaluator's ("IE") November 20, 2020 Updated Status Report ("Report") regarding PacifiCorp's 2020 All-Source Request for Proposals ("RFP").

We appreciate the Report's discussion of how PacifiCorp and the IE determined the "additional bids (without executed LGIAs [Large Generator Interconnection Agreements]) which otherwise would have been candidates but for the existence of the executed LGIAs" that were selected for addition to the Initial Shortlist ("ISL").¹ Following PacifiCorp's presentation at the Commission's September 22, 2020 Special Public Meeting, Renewable Northwest followed up with the company seeking additional information regarding the exclusion of a large number of bids due to constraints related to transmission bubbles and projects with executed LGIAs. We specifically requested additional modeling to explore the potential impacts of these constraints on the portfolio resulting from this RFP and encouraged the company to consider whether some means existed for including high-performing resources that were excluded due to interconnection constraints. Ultimately, we hoped to identify a procurement path for more projects to help ensure a robust least-cost, least-risk portfolio of new renewable resources on PacifiCorp's system.

In these comments we both support and seek additional clarity on the IE's and PacifiCorp's additional analysis regarding high-performing bids in some areas on the company's system saturated with executed LGIAs, and the company's openness to including some of these projects on the ISL. We recognize that these issues are complex and offer many opportunities for

¹ Report at 1.

stakeholder disagreement, and we appreciate the IE's and PacifiCorp's work to identify a creative solution that allows some additional projects to proceed in the RFP.

As to additional points, first, we note that the projects added to the ISL, while significant, still represent only a small percentage of the projects that were excluded due to PacifiCorp's interconnection constraints.² It may improve bidder confidence in the resulting ISL to clarify certain matters, i.e.:

- Whether all bids were considered for inclusion on the ISL under the additional analysis conducted by the IE and PacifiCorp;
- Why bids in Eastern Wyoming would likely be allocated prohibitively high interconnection costs resulting in their exclusion from the ISL³;
- Why bids that were high scoring in Appendix C of the IE Report were nevertheless eliminated due to economics in Appendix D⁴;
- What it means for projects to be "included" as that term is used in Appendix D; and
- Why high scoring projects that would not have caused an overage against the cap were not considered for inclusion on the ISL if a higher-scoring but larger project caused an overage against the cap.⁵

Additionally, the remaining thousands of megawatts that were not added to the ISL may still represent significant value to PacifiCorp. Recognizing that the company intends to file its next IRP in April 2021, before selection of a Final Shortlist from this RFP, we continue to encourage the company to consider another RFP in the near term to capture that outstanding value. We look forward to working with the company to explore solutions to interconnection constraints in future RFPs.

Finally, we highlight Section 6.2 of the Report regarding pumped hydro storage. We agree with the Report's recommendation that the issues identified by the IE "should be resolved prior to the next RFP process or a pumped hydro specific solicitation should be considered."⁶ In either case, we encourage the company to explore methods for assessing pumped hydro storage projects in

² At PacifiCorp's November 16, 2020 Integrated Resource Plan Public Input Meeting, the company indicated that 992 MW of additional projects had been included (see https://www.pacifiCorp.com/content/dam/pcorp/documents/en/pacifiCorp/energy/integrated-resource-plan/PacifiCorp_2021_IRP_PIM_November_16_2020.pdf at slide 24); in the Report, the IE appears to indicate that that number is 792 MW when accounting for multiple bids from the same project and without accounting separately for approximately 319 MW of storage capacity associated with hybrid projects (see Table 4-1). This is a point on which additional clarity could be helpful.

³ Report at 23.

⁴ Report at 39, Figure D-2.

⁵ Report at 38.

⁶ Report at 29.

future procurements, and we look forward to working with the company and other stakeholders to consider how best to incorporate these resources into future planning and procurement efforts.

All in all, we continue to support this RFP as a significant step in PacifiCorp's transition from reliance on carbon-intensive thermal resources to a least-cost, least-risk system served by non-emitting renewable resources.

Respectfully submitted this 4th day of December, 2020,

/s/ Max Greene

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