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Via Electronic Filing

Public Utility Commission of Oregon
Attention: Public Comments
P.O. Box 1088
Salem, OR 97308

RE UM 2143 PGE Comments Supporting a Resource Adequacy Docket

Portland General Electric Company (PGE) provides these comments supporting Staff's recommendation to open an investigation into resource adequacy (RA) in Oregon. RA is a critical issue at both the regional and state levels and, as Staff recommends, should be separately addressed within an RA-specific docket. It is critical to address and resolve the RA-related issues before advancing the remainder of the identified issues within UM 2024 direct access investigation.

We would like to thank Staff and Parties for their comments and efforts in supporting the workshops that have occurred over the last several months. PGE is optimistic that a separate RA docket is the best way to expeditiously address RA given the points of agreement and schedule identified in Staff's memo.

PGE agrees with many of the points made by OPUC Staff and offers the following comments.

- The contemplated RA docket should holistically address RA by considering both near-term solutions/steps and longer-term solutions/steps that ensure reliability in Oregon, without compromising the goals of decarbonization or affordability.
- There has been much discussion of how an Oregon specific RA framework would fit with the regional effort underway and making sure that the Oregon framework would be harmonized with the regional effort. PGE is an active participant in the Northwest Power Pool (NWPP) RA effort and agrees that a regional program could allow Oregon IOUs and ESSs to access potentially more cost-effective and diverse resources for addressing nearer-term resource adequacy. Accordingly, a state proceeding should seek to avoid or minimize potential conflicts with a regional program and seek to resolve discrepancies to facilitate an efficient transition into the NWPP program once it is launched. A state RA framework or requirements can establish a strong foundation in a state-level program based on categories of design elements (e.g. LOLE and ELCC methodologies) being looked at by the NWPP in a

manner that can be harmonized to and complement the NWPP's regional program, if and when it launches.

- Additional design features to supplement the draft design elements of the NWPP regional program should be implemented to complement and intentionally build on – rather than frustrate – the NWPP's ultimate design. Such a state framework or requirements also should be sufficiently flexible or available to be revisited post-NWPP implementation to reconcile unintended differences and update the framework.
- The regional program is not aiming to replace resource planning or procurement functions performed at the state-level, but instead the regional RA program is being intentionally designed to supplement these existing processes. This necessitates state-level actions to address these critical components of resource adequacy, especially given the limitations of the regional program: it is not seeking to establish a capacity market, is focused on near-term resource adequacy (7 months ahead) and is voluntary in nature.
- PGE is actively supporting the development of the NWPP regional effort and recognizes the unique benefits it has the potential to offer; we also recognize that regional efforts are often complex, can take time, and involve many critical parties across the NWPP footprint. Regardless of the outcomes of the regional effort, the issues raised regarding RA-related responsibility/obligations as well as fairness in costs and risks are best undertaken through the proposed resource adequacy docket so that they may be sufficiently investigated.

Furthermore, PGE notes that some Parties or entities may have the view that resource adequacy should not be considered an immediate or time-sensitive issue until a record and finding by the Commission have been made. PGE disagrees given the multiple studies and independent organizations, some of which are cited in the Staff memo, that have identified resource adequacy as a looming challenge for the Pacific Northwest. Those points aside, PGE supports Staff's assessment that the process outlined allows the Commission to address resource adequacy in a transparent manner while taking a proactive approach to address these concerns.

Thank you for the opportunity to comment. We support the separate docket approach and look forward to participating.

Thank you,

/s/ Karla Wenzel

Karla Wenzel
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