

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2143

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Resource Adequacy in the
State.

DOCKET NO. UM 2143

COMMENTS OF NORTHWEST &
INTERMOUNTAIN POWER
PRODUCERS COALITION ON
STAFF'S INITIAL REPORT

The Northwest & Intermountain Power Producers Coalition (“**NIPPC**”) appreciates this opportunity to provide comments on the Public Utility Commission of Oregon Staff’s initial report in this docket on the status of resource adequacy (RA) in the state of Oregon (the “**Staff Report**”).

NIPPC appreciates the time and effort Staff has devoted to the important topic of statewide resource adequacy. NIPPC agrees that ensuring reliability of the power grid is a critical public policy priority for the state and region and we support efforts to achieve this goal. As the Staff Report notes, all the Electricity Service Suppliers (“**ESSs**”) actively serving load in Oregon,⁵ as well as the three investor-owned utilities in the state, worked with Staff to provide detailed information about their five-year load resource balance using the data workbook created by the Western Power Pool for the Western Resource Adequacy Program (“**WRAP**”). NIPPC and its ESS members remain committed to working with Staff to further assess and develop appropriate RA policies for the state.

NIPPC appreciates the analytical approach and insights derived by Staff in its review. In particular, NIPPC agrees with Staff’s conclusion⁶ that there is no need for immediate Commission action to promulgate RA requirements in Oregon, and that “[a]ny such action would be premature and would be unlikely to result in a substantive increase to reliability for Oregon ratepayers of Commission-regulated utilities and alternative suppliers”—especially given the simultaneous progress of the WRAP’s development. NIPPC continues to believe that a regional, binding program for RA will be the optimal solution to ensure the most efficient means of avoiding capacity shortfalls that could jeopardize the reliability of the grid..

NIPPC also supports Staff’s recommendation that future state requirements should be designed to operate in a complimentary manner with a regional RA program, such as the WRAP. An

⁵ These ESSs are members of NIPPC.

⁶ Staff Report at 8.

aligned approach will be the least duplicative and most cost-effective way to approach RA without creating capacity silos—spurring regional cooperation among all participants. NIPPC notes that ESSs are active formal participants in the current initial phase of the WRAP.

NIPPC looks forward to continued engagement in this proceeding with respect to the Staff and Commission’s consideration of future state requirements.

Respectfully submitted this 14th day of April, 2022.

s/ Carl Fink

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