



April 4, 2024

*Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street, Suite 100  
Salem, OR 97308-1088

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,  
2023 All-Source Request for Proposals.  
**Docket No. UM 2274**  
Application for Reconsideration Response

Dear Filing Center:

In this comment letter, the Community Renewable Energy Association (“CREA”) responds to the application for reconsideration. CREA supports the requests that the Oregon Public Utility Commission (the “Commission”) take action to encourage competition. CREA also echoes the sentiment in the Alliance for Western Energy Consumers response in that it supports a fair and transparent competitive bidding process compliant with Oregon law, thereby ultimately benefiting customers.

Specifically, CREA responds and recommends as follows:

- CREA agrees that the new information revealed in Staff’s February 5, 2024 errata to its October 30, 2023 Staff memo in UM 2166 indicates how bias can enter the RFP bidding and scoring process when utilities have an incentive to own resources, and it is concerned that these distortions have resulted in investments leaving the state of Oregon to the detriment of Oregon local and state governments.
- CREA is concerned that because many stakeholders apparently did not have access to this information prior to the Commission’s decision on the RFP design in this docket, that stakeholders may have recommended other changes to the RFP design to mitigate the

bias that occurred in the last RFP. Further, CREA is concerned that the revelation of this material late in the process may have resulted in bidders losing confidence in the process and may thus result in a less competitive RFP with potential negative effects for ratepayers.

- CREA supports a workshop to explore how lessons learned from the last RFP can be applied in the present RFP, given where we are in the RFP process and the significance this RFP represents in meeting Oregon's climate goals.
- CREA supports competitive bidding processes that allow for diverse ownership of renewable resources and that are fair, objective and transparent. ORS 469A.075(4)(b); OAR 860-089-0010(1).
- CREA requests that the Commission open a rulemaking to examine changes to the competitive bidding rules in light of the issues recently revealed.<sup>1</sup>

CREA appreciates the opportunity to participate in these proceedings and looks forward to future engagement.

Thank you,

*/s/ Mike W. McArthur*

Executive Director

Community Renewable Energy Association

CREA is an ORS 190 intergovernmental association. Members include counties, irrigation districts, project developers, for-profit businesses and non-profit organizations. CREA supports business and economic opportunities through renewable energy development in a competitive environment. We support use of free enterprise principles to create economically and environmentally responsible electric generation within the State of Oregon.

---

<sup>1</sup> Including that history has shown that PGE benchmark bids have won in all of PGE's recent RFPs.