



DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

February 14, 2008

Allan Arlow
Administrative Law Judge
Public Utility Commission of Oregon
550 Capitol St NE – Suite 215
PO Box 2148
Salem OR 97308-2148

Re: UM 1345 – Submission from the Oregon Independent Evaluators

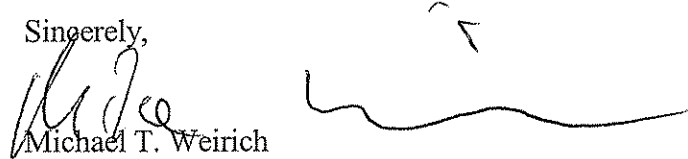
Dear Judge Arlow:

Enclosed with this letter is the “Initial Report of the Accion Group, Inc.” (Initial Report). The Accion Group is the entity that the Commission earlier selected to perform as the Oregon Independent Evaluator (Oregon IE) in this docket.

As was done recently in docket UM 1208 staff is submitting this Initial Report on behalf of the Oregon IE, rather than have the Oregon IE submit it on its own, both for the Oregon IE’s convenience and because the Oregon IE is not technically a party to this case. There is no need to submit a motion for acceptance of the report, as the Commission expects such reports to be prepared and filed as part of the Oregon IE’s duties. *See, e.g.*, UM 1208 - Staff Filing dated October 29, 2007.

Finally, please note that the Initial Report does not contain any confidential information.

Sincerely,


Michael T. Weirich
Assistant Attorney General
Regulated Utility & Business Section

MTW:na/GENW9118
Enclosure
cc: Service list

**INITIAL REPORT OF
ACCION GROUP, INC.
INDEPENDENT EVALUATOR
PORTLAND GENERAL ELECTRIC COMPANY**

I. EXECUTIVE SUMMARY

Accion Group, Inc. was retained by Portland General Electric Company (Portland General) to serve as the Independent Evaluator (IE) of the solicitation of up to 410 MW of additional mid-to-long-term energy supply to be available for generation capacity and energy deliveries in order to meet expected system needs starting between 2010 and 2014. Portland General is open to considering proposals based on a variety of structures and commercially viable resource types. Acceptable bids for both renewable and non-renewable energy will be considered.

In each energy solicitation where we serve as IE, Accion Group endeavors to ensure an unbiased process. In this Request for Proposal (RFP) we are working closely with Portland General to establish processes to prevent preferential treatment as well as even the appearance of bias.

This RFP is being conducted in a fair and unbiased manner. All prospective bidders are provided equal access to the same information, and we are unaware of any direct contact regarding the RFP between any bidder and Portland General, except through the website controlled by the IE, (Portlandgeneralrfp.com) or during the pre-RFP meetings. Accion Group has monitored every aspect of the RFP process to date including, but not limited to, the preparation of the initial draft RFP documents. In summary:

- The IE advised bidders of the RFP; they were invited and encouraged to participate.
- The process to date has been open and fair, permitting all bidders access to the same information at the same time.
- Prospective bidders were provided with draft RFP documents and the opportunity to request or recommend changes to those documents.
- The IE participated in live pre-RFP meetings on January 10th and 11th, 2008, with bidders and interested parties permitted to participate in person or by telephone.
- The web site provides the means for bidders to anonymously ask questions at any time.
- Answers to all questions are posted on the website within seven days of the corresponding inquiry.
- The RFP documents provide clear and complete product definitions.
- The RFP documents are thorough, accurate, and complete, providing all necessary information.
- The RFP documents identified the evaluation process to be employed. No prospective bidder questioned the evaluation process.

- To date all bidders have been treated in a like manner.
- Portland General has made all reasonable efforts to prevent disclosures of RFP-related information, except through means consistent with established RFP protocols.
- Confidential information provide by the bidders is protected by written agreements and we have observed no violation of these agreements.
- The RFP documents are free of bias towards or against any bidder or form of generation.
- All bids will be evaluated using the same standards, evaluation models and methodology.

Accion Group was asked to provide these services because of our knowledge of the electric industry and our ability to remain independent from the soliciting entity throughout the RFP process. Portland General recognizes the need to establish confidence in the RFP for marketers and in anticipation of the regulatory review that may follow.

At the request of Portland General the IE designed a secure web site to provide information to bidders about the RFP and as a platform for bids to be submitted. The web site captures and retains all documents, questions and answers, and bid-related information. Also, evaluation information will be uploaded to the web site for retention should a future review be required. All bid-related information is held in confidence and can only be accessed by the respective bidder, Portland General and the IE. The evaluation information is only accessible to Portland General, and the IE. All registered users of the web site are provided the opportunity to ask questions and provide comments on the draft RFP documents without their identity being disclosed to Portland General. Also, bidders have the option of receiving automatically generated email notices whenever documents are uploaded, announcements are posted, or the calendar is changed. These notices are designed to provide bidders with real-time awareness of the RFP process, without having to visit the web site and search for new information.

To date, we believe Portland General has acted in good faith with all bidders and has worked to create protocols and documents that will permit the RFP to be conducted in a fair and transparent manner. We have not observed any bias or deviation from the established protocols.

II. INTRODUCTION

Accion Group has extensive experience serving as the Independent Evaluator or Monitor in solicitation for energy and capacity. A summary of Accion Group's experience in energy and capacity solicitations is presented in the following chart.

ACCION GROUP, INC.
RFP Experience As of January 2008

POSITION	STATE	TERM OF SERVICE (YEARS)	CAPACITY SOUGHT	FUEL SOURCE	INITIAL YEAR
Independent Monitor	Arizona	Seasonal - 3	2,800 MW	Open	2003
Independent Evaluator	Arizona	Open	Open	Renewable	2006
Independent Evaluator	Arizona	Open	Open	Renewable	2007
Independent Evaluator	Arizona	Open	90 MW	Open	2007
Independent Monitor	Florida	5	500 MW	Open	2009
Independent Evaluator	Georgia	7 - 30	1,200 MW	Open	2009
Independent Evaluator	Georgia	7, 15, 30	2,000 MW	Open	2010
Independent Evaluator	Georgia	40	1,600 MW	Natural Gas	2011
Independent Evaluator	Georgia	5 - 30	1,300 MW	Open	2012
Independent Evaluator (Construction Program)	Georgia	40	1,600 MW (Self Build)	Natural Gas	2011
Independent Evaluator	Georgia	40	600 – 1,200 MW	Open Including Nuclear	2016-2017
Independent Evaluator	Hawaii	Open	1,600 MW	Open	2008
Independent Monitor	Oregon	5-3	1,700 MW	Open, Request for IGCC	2012, 2013, 2014
Independent Evaluator	Oregon	4-5	410 MW	Open	2008
Advisor Town of Lempster, NH	NH	20	24 MW	Wind	2008

Accion Group has no financial interest in Portland General, any affiliates of Portland General, or any entity that is a registered bidder or non-bidder in the RFP. Accion Group's business relationship with Portland General is limited to serving as IE.

III. CONFIDENTIALITY

Portland General established an evaluation team to receive and evaluate all bids. Each team member was instructed on holding all RFP-related information as confidential, and to avoid any discussion of the RFP with persons outside of the company. Portland General provided a Confidentiality Agreement as part of the RFP documents, and committed to adhere to its terms. Each bidder was invited to execute and upload the agreement to their respective bid book. If the agreement is uploaded two weeks before bids are due, Portland General committed to execute the document and upload the bilateral agreement to the bidder's bid book before the bid date.

We believe Portland General established sufficient standards for the evaluation team so there should be no unauthorized information exchanged with any bidder. Portland General should also be able to avoid

the release of any bid information through the restrictions placed on access to bids, both in the web site bid books and at the Portland General offices. The offer to execute a Confidentially Agreement before bids are submitted should help convince bidders that their bid information will be protected, which should encourage participation in the RFP.

Bids are to be submitted to the Portland General offices in printed form and uploaded to the web site by the same bid deadline. In the event the printed bid differs from the one submitted on the website, the website version will be accepted as the bidder's final offer. No bid fee is required to participate.

We believe Portland General's process provides bidders with maximum flexibility. The lack of a bid fee should encourage a robust response from merchant suppliers. By accepting bids on the website, Portland General provides bidders with the opportunity to correct, without question, bids up until the last minute. By requiring bidders to upload bids to the website, Portland General will create an exact record of when each bid is submitted thereby eliminating any question of compliance with the bid receipt standards.

We believe Portland General's requirements for bids and procedures are reasonable and appropriate for this RFP.

IV. DOCUMENT DEVELOPMENT

Draft RFP documents were reviewed with the IE before being posted on the web site for bidders to consider. The documents were available for review when the web site was first released on December 21, 2007. The documents included the draft RFP, a draft Tolling Agreement, the draft Firm Wholesale Power and Purchase and Sale Agreement, and a confidentiality and non-disclosure agreement. As discussed in the web site section of this report, bidders were requested to ask questions about the documents via the web site and Portland General provided a response to each question. Also, bidders were invited to suggest changes to the draft RFP documents by providing red-lined changes to documents, with an explanation of the reasoning behind each suggested change. All questions and comments were delivered to Portland General without the identity of the person who proffered it. All registered users of the web site could submit questions or comments, regardless of whether they were prospective bidders or interested parties.

Portland General held two RFP Workshops, one with a focus on bidders and one designed for interested parties. The terms and requirements of the RFP documents were discussed in detail, and all parties were invited to ask questions during the workshops, and to submit questions and comments through the web site.

In our review of the RFP documents before the drafts were posted we found Portland General receptive to suggestions for clarification of areas that could be confusing or misinterpreted by bidders, and accepting of suggestions on ways to make the RFP attractive to bidders. We found the RFP documents to clearly and completely identify the products Portland General seeks, the terms and conditions for

participation in the RFP process and the expected terms for any future contract for delivery of energy. Portland General designed the RFP to limit barriers to participation by bidders. For example, the extremely low threshold for participation and the absence of any bid fee provides the avenue for the most modest suppliers to participate in the RFP and have a fair opportunity of being selected as a winning bidder.

Based on our review of the questions posted on the web site and our participation in the RFP Workshops, we believe bidders are fully aware of the RFP process and that there does not seem to be any confusion regarding the terms and conditions in the RFP documents. No prospective bidder has objected to any terms or conditions.

V. WEB SITE OPERATION

Accion Group worked with Portland General to design a web site that organizes information in a useful way, and provides easy use by bidders and interested parties. The general public has access to the calendar and announcements about the RFP without having to register, simply by clicking on the menu bar for those items. Also, the home page accurately describes the scope of the RFP and interested individuals are invited to register for full access to documents, and as a way to submit questions, view answers to questions of others, and to ultimately submit bids.

When the web site was launched the IE sent email messages to prospective bidders and interested parties. The list of recipients of the broadcast message was compiled from information maintained by Portland General and the IE. Bidders and interested parties were invited to register on the web site in order to review draft RFP documents and view information about the RFP.

WEB SITE STATISTICS As of January 18, 2008

Email notifications of RFP and web site	143
Registered bidders	43
Registered non-bidders	6
Questions posted to web site	6

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 Select RFP => Energy RFP

Energy RFP Home Page

This section of the web site is to be used for the 2010-2014 RFP for energy. Information regarding the Demand Side Resource RFP is found elsewhere on this web site.

PGE is seeking to acquire up to 410 MWs of additional mid-to-long-term energy supply to be available in the 2010 - 2014 timeframe. PGE is open to considering proposals based on a variety of structures and commercially viable resource types. Acceptable bids for both renewable and non-renewable resources include various forms of contracts, such as power purchase agreements, tolling arrangements and financial hedging instruments, as well as a range of ownership structures, including sales of existing assets, acquisition of project development or natural resource rights and options, build-own-transfer agreements and partial ownership.

Portland General Electric requests that all communications between a prospective bidder and utility must be through this web site. Portland General Electric personnel have been instructed not to accept telephone calls, emails, or any other communications regarding this solicitation from prospective bidders or registered users of this site. Attempting to contact the Company will be considered a breach of the solicitation protocols and may result in the disqualification of a prospective bidder.

Information regarding the solicitation schedule, publicly available documents and announcements are available to the public on this site. Questions can be submitted to the Company on the web site, and answers will be posted and available to all users. Certain information is restricted and only available to registered users.

[Home](#) | [Documents](#) | [Comments](#) | [Q&A](#) | [Bid Book](#) | [Evaluation](#) | [Log On](#)

All contact shall be via email to the Independent Evaluators: [Harry Judd](#) or [Alan Kessler](#)
 Any website questions or problems should be addressed to [Istvan Gervai](#)

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The RFP home page is designed to provide information about the RFP and access to announcements and the calendar without having to be a registered user of the web site.

The announcement page is used to advise all visitors to the web site of RFP-related developments. Registered users can opt to receive automatic email notices when an announcement is posted to the page.

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Announcements Energy RFP


- Bidder pre-RFP workshop is scheduled for January 10, 2008 and the stakeholders' workshop will be held on January 11, 2008. Each meeting will be from 9 AM to noon at 2 World Trade Center, rooms Mezzanine 2.3, 3, 4. The 2 World Trade Center building is located at SW 1st and SW Salmon Streets in downtown Portland. There is parking available in the garage underneath 2 World Trade Center, or on the street. For those who wish to participate by Teleconference, please call (503) 464-2220 and enter 11208. Please MUTE YOUR TELEPHONE, except when asking questions. Presentation materials will be posted online prior to the meetings. You may present questions prior to the meetings by either posting them on the PGE RFP Web Site (portlandgeneralpge.com) or emailing them to the IE. All questions posed during the meetings will be recorded and written answers will be posted on the Web Site. (Ref: # 1)
- Bidders may submit signed confidentiality agreements up until the deadline for bid submission (currently targeting 4:00 PM on April 10, 2008). However, bidders who desire to have PGE execute the confidentiality agreement prior to bid submission must submit their signed agreement no later than two weeks prior to bid submission, or by 4:00 PM on Friday, April 4. Due to the need to establish procedures that safeguard the confidentiality of all information marked confidential, PGE cannot accept any changes to its form confidentiality and non-disclosure agreement posted on the documents page of this web site. Each registered bidder has been sent a new password, which provides access to an individual Bid Book. THE BID BOOK CAN ONLY BE ACCESSED BY THE BIDDER, PORTLAND GENERAL, AND THE INDEPENDENT EVALUATOR. A bidder's confidentiality agreement should be uploaded to the Bidder's Proposal in the Bid Book. Portland General Electric will upload the counter-signed confidentiality agreement to the Responses from PGE folder in the bidder's bid book. (Ref: # 2)

Document	Download	Size	Date Posted	View
Pre-RFP Workshop 1-10-11-2008		666146	1/8/2008 3:53p	
The RFP Workshop Agenda 1/10/2008		186598	1/8/2008 3:53p	

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All contact shall be via email to the Independent Evaluators: [Harry Judd](#) or [Alan Kessler](#)
 Any website questions or problems should be addressed to [Istvan Gervai](#)

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User Questions Energy RFP

PLEASE DO NOT IDENTIFY YOURSELF OR YOUR COMPANY WHEN POSTING QUESTIONS
QUESTIONS AND ANSWERS WILL BE AVAILABLE TO ALL USERS OF THIS WEB SITE.

All questions will be reviewed by the Independent Evaluator and answered Portland General Electric Company. You will be notified by email when an answer to your question has been posted to the web site.

Once an answer has been posted, click on the question to view the answer.

When posting a question, please select a category. When viewing questions and answers, clicking the "category" button will sort questions and answers by the category selected by the person who posted the question.

PLEASE DO NOT IDENTIFY YOURSELF OR YOUR COMPANY WHEN POSTING QUESTIONS.

[View All Questions/Answers](#)

Ask Question	Question						Answer
Ref.#	Category	Question	Date Asked	Date Posted	Date Modified	Date Answered	Date Modified
6	Other	Must a bidder sign the Modified Protective Order to participate in the RFP? If so, when must it be signed and how does a bidder get a copy?	1/15/2008 12:00p	1/15/2008 12:00p	-	1/16/2008 1:22p	-
5	Other	When is the next solicitation planned after the 2008 RFP?	1/14/2008 6:37p	1/14/2008 6:37p	-	1/16/2008 1:22p	-
4	Credit	How does PGE view renewable energy from out of state?	1/14/2008 6:36p	1/14/2008 6:36p	-	1/16/2008 2:16p	-
3	Other	Page 24 of the dist RFP refers to the Climate Trust of Oregon. Should be corrected to say Climate Trust.	1/8/2008 7:22p	1/8/2008 7:22p	-	1/16/2008 2:18p	-
2	Other	There are meetings about the RFP on Thursday and Friday. Which should a bidder attend?	1/8/2008 3:29p	1/8/2008 3:29p	-	1/9/2008 3:31p	-
1	Other	For the non-renewable energy products, is the total quantity 250MW or is it in 25MW increments? If in 25MW increments, what is the total desired volume?	1/4/2008 2:10p	1/4/2008 2:10p	-	1/4/2008 2:11p	-

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All contact shall be via email to the Independent Evaluator: Harry Judd or Alan Kissler
Any website questions or problems should be addressed to: Harri@accion.com

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All registered users are invited to post questions for Portland General to answer. All questions and answers can be viewed by any registered user. All questions are automatically delivered by email to Portland General, without the identity of the individual who posted the inquiry. When an answer is posted, the web site sends an email message to the person who posted the question.

Action Group Independent Evaluator for **Portland General Electric RFP**

Emily Judd [Admin Menu](#)

Select RFP => [Energy RFP](#)

Documents Energy RFP

To further assist you in your document search, click on one of the blue column headers to choose a document sort order.

Hide Files in Subfolders

Folder Name	File Name	Date
Final Cost RFP Documents		
IE Documents		
Initial Cost RFP Documents		
Appendix E - Final Physical Windbooks Energy Purchase and Sale Agreement	12-21-07 doc	12/21/2007 2:09:12 PM
Confidentiality and NonDisclosure Agreement Generic	doc	12/21/2007 2:09:22 PM
PG&E 2018RFP_E08f12197.doc		12/21/2007 2:07:17 PM
Webing Agreement	12-21-07.doc	12/21/2007 2:08:56 PM
PG&E Documents		
PG&E RFP BIDDERS PRESENTATION 01188008_Accent1.pdf		1/9/2008 1:43:37 PM
PG&E Bidder's Presentation_011880081.pdf		1/9/2008 1:44:01 PM
PG&E Evaluation Team		

Folder: E08f
This folder does not contain any files.

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All contact shall be via email to the Independent Evaluators Harry Judd or Alan Rescher.
Any website questions or problems should be addressed to Harry's Office

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Documents are posted on a separate page and separated by subject matter for easy reference. Registered users can opt to receive an automatic email notification when a document is uploaded to the document page. Documents can be opened or downloaded from this page.

Each registered bidder has an individual bid book. The bidder's bid book can only be accessed by the bidder, Portland General, and the IE. Bidders will use the bid book to deliver their bids, and as the means for the exchange of information. In our experience it is a rare bid that does not require clarification or explanation before the evaluation can be completed. By using the bid book to exchange that information, the web site will capture the information for future review, if needed. It also permits those with access to the web site to view the information at any time, from any computer. The bidder and Portland General receive emails from the web site when materials are uploaded to the bid book, so there is virtually no delay in the notification of when information is available for review.

Action Group Independent Evaluator for **Portland General Electric RFP**

Harry Judd [Admin Menu All Documents](#)

Bid Book Energy RFP

Use this page to submit your Bid related documents.

To upload a file, click the file upload icon, then browse your computer for the file and select it. When you click the 'Upload this file' button, you will see a progress indicator for the file upload.

Once the file is uploaded, it will then be automatically sent via email to the Independent Evaluator and Portland General Electric. This email process may take some time, depending on the size of the document which you are uploading. Do NOT close your browser or click with your mouse until the page refreshes and you see your file on the list on the screen. Again, while you will see the name of your document, other bidders will not see your information.

If an icon is greyed out, you do not have permission for that particular action.

Hide Files in Subfolders

Folder Name	Owner
Bidder's Present	Site Administrator - Accent
Questions to IE/IE	
Responses to PG&E	
Responses from Bidder	
Responses from PG&E	

Current Folder: E08f
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Home | Documents | Comments | Q&A | Bid Book | Evaluation | Log On

All contact shall be via email to the Independent Evaluators Harry Judd or Alan Rescher.
Any website questions or problems should be addressed to Harry's Office

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V. CONCLUSION

We found the documents and process designed by Portland General to be comprehensive and complete. The documents fully describe the products that will be considered and the processes for submitting a bid. We did not identify any bias in the documents or process towards or against any prospective bidder or form of energy generation. We believe a fair and transparent RFP can be conducted using the RFP protocols and RFP documents prepared by Portland General.

1 **CERTIFICATE OF SERVICE**

2
3 I certify that on February 14, 2008, I served the foregoing upon all parties of record in
4 this proceeding by delivering a copy by electronic mail and by mailing a copy by postage prepaid
5 first class mail or by hand delivery/shuttle mail to the parties accepting paper service.

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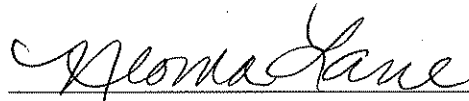
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