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June 4, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 2059 – PacifiCorp’s Motion to Amend the Procedural Schedule

PacifiCorp d/b/a Pacific Power submits for filing its motion to amend the procedural schedule in the above referenced docket.

Informal inquiries may be directed to Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,

Shelley McCoy
Director of Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2059

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of 2020 All-
Source Request for Proposals.

**PACIFICORP’S MOTION TO AMEND
THE PROCEDURAL SCHEDULE**

Expedited Consideration Requested

Pursuant to Oregon Administrative Rule (OAR) 860-001-0420, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) moves the Public Utility Commission of Oregon (Commission) to amend the procedural schedule in this proceeding to extend the filing date of the acknowledgement of the final shortlist with the Independent Evaluator’s (IE) closing report from June 10, 2021 to June 15, 2021 by 1:00 pm (Motion). Granting of the Motion will provide PacifiCorp sufficient time to complete the sensitivity analyses required to develop the final shortlist and the IE sufficient time to prepare and finalize its closing report. Further, granting the Company’s Motion will not impact the remainder of the procedural schedule. Good cause exists to grant the Company’s Motion.

The Company requests expedited consideration of this Motion as the filing date of the acknowledgement of the final shortlist with the IE’s closing report is due in less than a week. Thus, as required under OAR 860-001-420(6), on June 3, 2021, PacifiCorp conferred with parties in this proceeding via email regarding its request to amend the procedural schedule. As a result of the conferral with the parties, PacifiCorp has been instructed that it can represent that Commission Staff supports the Motion. The Oregon Citizens’ Utility Board, Alliance of Western Energy Consumers, and Renewable Northwest took no position on the motion. At the

time of filing the Motion, PacifiCorp has not received responses from Avangrid Renewables, Intermountain Power Producers Coalition, Intermountain Wind, Swan Lake North Hydro LLC, and Tetra Tech. The Company requests that responses to the Motion be filed by June 7, 2021.

BACKGROUND

On February 24, 2020, PacifiCorp filed an application with the Commission for approval of its 2020 All-Source Request for Proposals (2020AS RFP), which included a request that the Commission appoint an IE. On April 8, 2020, the Commission adopted the Staff Report recommending that PA Consulting Group, Inc. serve as IE.¹ PacifiCorp filed its final draft 2020AS RFP on April 22, 2020. The Commission approved PacifiCorp's 2020AS RFP subject to modification and condition at a Special Public Meeting held on July 2, 2020.² On July 6, 2020, the Company published its 2020AS RFP. On September 15, 2020, the IE filed a Status Update Report regarding the progress of PacifiCorp's 2020AS RFP. Following the analysis of bids received, PacifiCorp notified bidders of their selection to the initial shortlist on October 30, 2020 and requested that the bidders enter the Company's interconnection cluster study.³ On November 20, 2020, the IE submitted its Updated Status Report on PacifiCorp's 2020AS RFP, which provided the IE's findings from its independent bid scoring review process, its observations of the Company's modeling, and a discussion of other considerations pertinent to the development of the initial shortlist. The Company received the results of the interconnection cluster study in April 2021. Pursuant to the schedule in this proceeding, on June 10, 2021,

¹ *In re the Matter of PacifiCorp d/b/a Pacific Power, Application for Approval of 2020 All-Source Request for Proposal*, Docket No. UM 2059, Order No. 20-114 (Apr. 8, 2020).

² Docket No. UM 2059, Order No. 20-228 (July 16, 2020).

³ On June 15, 2020, PacifiCorp filed an application with the Commission for an order authorizing the Company to move from a serial "first-come, first-served" interconnection study process to a "Cluster Study" process for Qualifying Facility interconnection. The Commission approved PacifiCorp's Queue Reform Proposal subject to the recommendations set forth in the Staff Report dated August 3, 2020 as modified by Order 20-268. *See, In the Matter of PacifiCorp d/b/a Pacific Power Application for an Order Approving Queue Reform Proposal*, Docket No. UM 2108, Order No. 20-268 (Aug. 19, 2020).

PacifiCorp is to (1) file its final shortlist for acknowledgment with the IE's closing report; and (2) provide all sensitivity reporting and workpapers to Staff and the IE.

REQUEST TO AMEND SCHEDULE

Since the notification of bidders to their selection to the initial shortlist, the preparation has been underway to begin the final shortlist evaluation and modeling, which includes the development of the appropriate sensitivities to use to evaluate bids for the final shortlist selection. The Company has worked closely with Staff and the IE regarding the development of the sensitivities and is working diligently to complete all analyses to develop the final shortlist to submit to the Commission for acknowledgement.

The Company has been working to deliver the final shortlist of responsive bids and the results and impacts of all sensitivity analyses performed to the IE by June 1, 2021 so that the IE would have sufficient time to prepare and finalize its closing report for filing on June 10, 2021. However, the Company continues to finalize sensitivities to ensure that information provided to the IE and Commission Staff is complete, accurate, and includes all relevant outputs. As a result, PacifiCorp will not be able to provide the final shortlist of responsive bids and the results and impacts of all sensitivity analyses performed to the IE until June 8, 2021, which does not allow the IE sufficient time to prepare its closing report before the filing required on June 10, 2021.

OAR 860-089-0500(3) requires that a utility's request for acknowledgement of a final shortlist include the IE's closing report. Because the final shortlist of responsive bids and the results and impacts of all sensitivity analyses performed will be provided to the IE on June 8th at the latest, the IE will not have sufficient time to complete its closing report in time for a June 10th filing. Therefore, PacifiCorp respectfully requests that the Commission amend the schedule to allow the filing of PacifiCorp's final shortlist with the IE closing report on June 15, 2021 by

1:00 pm instead of June 10, 2021. Granting PacifiCorp's Motion will allow it sufficient time to complete the sensitivity analyses as developed by the Company, Staff, and the IE. It also allows the IE time to prepare and finalize its closing report to be submitted with Company's final shortlist. PacifiCorp can then file its final shortlist with the IE's closing report as required by OAR 860-089-0500(3). The Company's request does not impact the remaining dates in the schedule causing no further delay. As such, parties are not prejudiced by the short delay in the filing of the final shortlist and IE closing report.

CONCLUSION

Based on the foregoing, PacifiCorp respectfully requests that the Commission grant PacifiCorp's motion to amend the procedural schedule to allow the filing of the final shortlist with the IE's closing report to be filed on June 15, 2021 by 1:00 pm instead of June 10, 2021. Granting of the Motion will provide PacifiCorp sufficient time to complete the sensitivity analyses for the development of final shortlist and the IE sufficient time to prepare and finalize its closing report. Further, the remainder of the schedule will not be impacted because of the granting the Company's Motion. Good cause has been shown to grant the Motion. The Company requests expedited consideration of this Motion as the filing date of the acknowledgement of the final shortlist with the IE's closing report is due in less than a week.

Respectfully submitted this 4th day of June, 2021, on behalf of PacifiCorp.



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