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October 24, 2019

### VIA ELECTRONIC FILING

PUC Filing Center Public Utility Commission of Oregon P.O. Box 1088 Salem, Oregon 97308-1088

# **Re:** Docket UM 2009: In the Matter of the Complaint of Madras PV1, LLC, against Portland General Electric Company.

Attention Filing Center:

Portland General Electric Company (PGE) requests that the enclosed Errata—**page 27** of PGE's Response Testimony of John Morton (PGE/100), and **page 3** of PGE's Response Testimony of Megan Hill, Chad Croft, and Ryin Khandoker (PGE/300), filed June 11, 2019—be substituted for the corresponding pages.

If you have any questions regarding these corrections, please contact this office.

Sincerely,

flistra

Alisha Till Paralegal

Attachments

# **REDLINED VERSION**

## ERRATA PAGE 27

### PGE'S RESPONSE TESTIMONY OF JOHN MORTON (PGE/100)

1 backing down our generators, which would be effective in the event that that Ecoplexus 2 did not pay for NRIS and associated network upgrades. To be clear, we believe that we 3 have no obligation to back down a utility resource in order to facilitate a QF's 4 interconnection. Moreover, as discussed in the Testimony of Ms. Hill, Mr. Croft, and 5 Mr. Khandoker (PGE/300), we understand that PGE's legal obligations related to PRB do 6 not permit the project to be backed down significantly and, as a result, it would be 7 extraordinarily difficult to estimate the impact on PGE's customers if it was required to 8 do so.

9

#### Q. Did Ecoplexus respond to PGEM's proposal with another revised PPA?

A. Yes. On March 29, 2019, Ecoplexus provided PGEM with a revised PPA. Perhaps the
 most notable changes made in this PPA were that Ecoplexus changed Madras's
 nameplate capacity rating yet again, this time from 75 MW-DC to 65.784 MW-DC, and
 also reinserted the allowance for Ecoplexus to sell test energy to a third party.

# Q. Is there any problem with revising the project's nameplate capacity, when the net output remains the same?

A. Absolutely. Changing a project's nameplate capacity changes the project's generation
 profile, independently of the project's net output. Industry standard for solar facilities is
 to overbuild the nameplate capacity so you have approximately 1.3 MW-DC in
 nameplate capacity for every 1 MW-AC in net output. This allows you to have a flatter,
 more stable generation profile because you are more likely to reach your maximum net
 output for more hours.

In the case of Madras, Ecoplexus was gradually decreasing the project's nameplate capacity (from 80 to 75 to 65 to 63), until the nameplate capacity and the net output were roughly equivalent. This means that the generation profile will have a more dramatic peak, impacting the avoided cost pricesproject's value to PGE. Such a change can also impact the project's capacity contribution, as a solar project would be able to meet the target capacity for only a couple of hours during the middle of the day.

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UM 2009 - Response Testimony of John Morton

# **REDLINED VERSION**

### **ERRATA PAGE 3**

### PGE'S RESPONSE TESTIMONY OF MEGAN HILL, CHAD CROFT, AND RYIN KHANDOKER (PGE/300)

1 downstream temperature and to provide fish passage, mainly for Chinook, steelhead, 2 sockeye and bull trout. These fish are collected at the SWW facilities and transported for 3 release into the lower Deschutes River, immediately downstream of the Reregulating Dam. 4 Downstream of the Round Butte Dam is Lake Simtustus. Lake Simtustus is operated for 5 recreational activities, has two parks, and is stocked regularly with rainbow trout. Water flows from Lake Simtustus through the Pelton Dam (110 MW) into the Reregulating 6 7 Reservoir. Unlike the other reservoirs, the Reregulating Reservoir has no fishery or 8 recreation. From the Reregulating Reservoir, water enters the Reregulating Dam (19 MW). 9 This final dam's purpose is to maintain run-of-the-river flows in the lower Deschutes River.

10PRB occupies a total of 8,300 acres, including 2,161.9 acres of land owned by the11Tribes, as well as land and waters under the jurisdiction of the Bureau of Land Management12within the U.S. Department of Interior (Department of Interior), National Forest Lands13supervised by the U.S. Forest Service, and lands owned by the State of Oregon.

14

#### Q. Does PRB include any transmission facilities?

A. Yes. The output from the three dams is transmitted through a-generation lead lines to the
Round Buttenearby substations. The output of Pelton and Round Butte are transmitted
through separate lead lines to the Round Butte substation. Thisese generation lead lines is
are part of the Project, is-are covered by the Federal Energy Regulatory Commission
(FERC) license, and is-are co-owned by the Tribes.

20 Q. When was PRB initially constructed?

A. Construction of the Pelton Dam and the Reregulating Dam was completed in 1958, and the
Round Butte Dam was completed in 1964.

#### 23 Q. What kinds of benefits does PRB provide to PGE's customers?

A. PRB is considered the "jewel in the crown" of PGE's generation fleet. In addition to energy
 and capacity, PRB provides critically valuable spinning reserves, dynamic capacity, load
 following service, and frequency control to PGE's system. Indeed, there is an increasing
 regional need for the sort of flexible capacity provided by PRB, as variable renewable

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