

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 48

In the Matter of

PORTLAND GENERAL ELECTRIC

2009 Integrated Resource Plan

Renewable Northwest Project's
Comments on Staff's Proposed Order

Renewable Northwest Project (RNP) appreciates the opportunity to comment on Staff's Final Comments and Recommendations and Draft Proposed Order. RNP's comments on Staff's recommendations regarding Boardman are contained within separately filed joint comments. These individual comments are filed to generally support, with some additional suggestions, Staff's recommendations on two other issues: (1) wind integration; and (2) Cascade Crossing.

1. Wind Integration

In general, RNP supports Staff's recommendation that PGE again be directed to produce a detailed wind integration study report that is capable of being, and required to be, vetted by regional stakeholders. This time, however, RNP recommends that the Commission impose more specific additional requirements for the wind integration study process. By introducing more specific expectations and parameters, the Commission may be able to avoid repeated non-compliance and promote constructive dialogue between the utility and stakeholders, leading to more effective Commission oversight.

RNP's perspective on best practices for successful wind integration studies comes from its extensive experience as a stakeholder in wind integration studies across the region. In our view, a "successful" study is not necessarily one in which all participants and stakeholders agree on the precise outcome, but rather is one in which (1) stakeholders are given adequate opportunity to review and comment on study methodology and results at appropriate points in the study process; and (2) the utility objectively considers stakeholders' technical comments and demonstrates a willingness to modify its approach or respond substantively to significant areas of concern. Only with true engagement

between utilities and stakeholders can the Commission rely on the stakeholder process to hold utilities accountable. Employing one or more of the strategies listed below may contribute to a successful wind integration study process and assist the Commission with its oversight role as these studies grow ever more numerous and complex:

- Require use of a technical review committee (TRC) of national or regional wind integration experts, and ensure that committee members have the opportunity to sign off or not sign off on the final study. A technical review committee is an effective tool for overseeing detailed work, but is not a substitute for review by other stakeholders.¹
- Require use of an independent facilitator who is charged with managing timelines for comments, discussion, and utility decisions and encouraging utilities to engage substantively with stakeholder concerns.
- Commit sufficient resources for Commission staff to participate in the study process as a neutral arbiter at various decision points, recognizing that the complexity and number of wind integration studies would require a significant commitment of resources.

Although wind integration studies are complex, successful experiences are possible. Integration costs are an important component of determining the cost-competitiveness of clean, variable energy generation from wind and solar resources in long-term planning; integration costs also have a direct effect on customer rates. We encourage the Commission to consider incorporating in its acknowledgment order these or other suggestions for promoting accountability.

A final note: Staff did not adopt RNP's recommendation that PGE use Bonneville's wind integration rate until it has produced an adequate wind integration study. RNP's suggestion was reasonable: PGE currently uses Bonneville balancing services and there is no indication of why PGE would choose to self-balance new resources when the rate PGE

¹ The Utility Wind Integration Group and National Renewable Energy Laboratory have collaborated on a set of principles for TRC involvement in utility wind integration studies. The document, available at <http://www.uwig.org/TRCguidelines.htm>, addresses several important issues such as stakeholder involvement beyond the TRC and assurance that the utility will refer to TRC involvement only if the TRC has clearly accepted and agreed with the results of the study.

definite to allow forward progress in the Cascade Crossing project while preserving the opportunity for timely review of project economics.

DATED this 29th day of October, 2010.

Respectfully submitted,

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