



Bureau of Planning and Sustainability

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March 4, 2020

Public Utilities Commission of Oregon
201 High St. SE, Suite 100
Salem, Oregon 97301-3398

RE: Docket No. LC 70 - City of Portland's comments on PacifiCorp's IRP

Dear Commissioners:

Thank you for the opportunity to comment on the 2019 Integrated Resource Plan (IRP) that PacifiCorp filed with the Commission on October 18, 2019.

The City of Portland's 100 Percent Renewable Energy Resolution sets goals to power Portland with 100 percent renewable electricity by 2035. Renewable electricity is strategic to our overall climate goal of 100 percent renewable energy for all of Portland's energy demands by 2050. Getting to a 100 percent clean economy is comprised of four fundamental pillars: efficiency, clean electricity, renewable transportation fuels and building electrification. Implementing the resolution also means taking all of the carbon out of the economy in a manner that is just and equitable for our local and global communities of color and low-income populations.

In support of our commitment to equity and renewable energy, the City of Portland submits the following comments on PacifiCorp's 2019 IRP:

1. Oregon electric utilities must plan to significantly reduce carbon emissions from the combustion of fossil fuels. Resource planning and carbon accounting should include the social cost of carbon to avoid underestimating economic risk to their customers.
2. PacifiCorp should target drastically higher greenhouse gas reductions. Although the 2019 IRP steps in the right direction, PacifiCorp should be more aggressive in its timeline to retire coal plants and decarbonize its electricity generation to meet Portland's 100 percent renewable electricity by 2035 goal.
3. PacifiCorp's upcoming Request for Proposal (RFP) should seek non-carbon emitting resources to meet its system needs. An RFP for non-carbon emitting resources would be more consistent with PacifiCorp's long-term vision than an all-source RFP.
4. PacifiCorp should continue to perform coal analyses in future IRPs and evaluate the economics of its coal units.
5. PacifiCorp should be more active on demand response. The City of Portland shares concerns raised by Northwest Energy Coalition (NVEC), the Citizens Utility Board and Public Utilities



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandonline.com/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

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Commission staff about the lack of meaningful demand response resources in the IRP. Following the lead of Portland General Electric's successful residential and commercial demand response programs in Oregon is recommended.

6. PacifiCorp should explore how community-based resources can meet system needs. The City's 100 percent Renewable Energy Resolution prioritizes community-based development of renewable energy infrastructure with investments in community facing organizations to meet 2 percent of community-wide energy needs (including, transportation, heating and electricity) by 2035, and 10% by 2050. Starting early in 2019, the Bureau of Planning and Sustainability (BPS) began collaborating with a coalition of local partners to develop community-based renewable energy generation. Through future resource planning efforts, we encourage PacifiCorp to explore how small scale, community-based resources in Portland can play a role in meeting system needs.
7. PacifiCorp should accelerate transportation electrification for their commercial and residential customers, including finding ways to further invest in charging infrastructure. We recommend expanding efforts that prioritize low-income customers in coordination with the State of Oregon's Charge Ahead electric vehicle rebate program.
8. PacifiCorp should continue to improve its stakeholder engagement process. Following the recommendations of Senate Bill 978, we recommend making the IRP process more accessible to additional stakeholders and creating spaces for more meaningful engagement with a broader range of community voices.
9. PacifiCorp should integrate local renewable energy goals in future IRPs. Specifically, Portland's 100 percent renewable electricity goal should be included in PacifiCorp's resource planning, similar to how Utah's House Bill 411 renewable resource acquisition needs are considered in the 2019 IRP. Currently, the City participates in renewable electricity procurement through Portland General Electric's Green Future Impact to reach 100 % renewable targets for City-owned assets. We would like to work with PacifiCorp to develop a similar pathway to achieve 100 percent renewable electricity city-wide by 2035 or sooner.

The IRP process provides a critical opportunity for the City of Portland to make progress toward our 100% renewable energy goals. We thank you for considering these comments.

Sincerely,



Andrea Durbin
Director

