

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 73**

In the Matter of  
  
PORTLAND GENERAL ELECTRIC  
COMPANY,

THE RENEWABLE ENERGY  
COALITION’S COMMENT ON THE  
STAFF MEMORANDUM

2019 Integrated Resource Plan.

The Renewable Energy Coalition (the “Coalition”) respectfully submits these Comments on the Staff Memorandum (“Staff Memo”) for consideration by the Oregon Public Utility Commission (the “Commission” or “OPUC”) in the matter of Portland General Electric Company’s (“PGE’s”) 2019 Integrated Resource Plan (“IRP”). The Coalition continues to support its positions articulated in its Opening Comments filed October 11, 2019 and Final Comments filed December 17, 2019. PGE’s 2019 integrated resource plan (“IRP”) fails to reasonably account for anticipated qualifying facility (“QF”) contracts both for existing QFs and forecasts of new QFs. Uncertainty as to what a likely future looks like is not a good reason to not even attempt a forecast, but rather, PGE should account for this uncertainty with appropriate analysis.

The Coalition also supports Staff’s recommendation on QFs in part. Staff recommends that the Coalition’s concerns regarding planning for future and expiring QFs be addressed in UM 2038.<sup>1</sup> In opening comments however, Staff strongly recommended

---

<sup>1</sup> Staff Memo at 60.

that PGE amend its QF forecast in the 2019 IRP and in future IRPs to include a forecast of future QF contracts.<sup>2</sup>

The Coalition agrees that Docket UM 2038 will provide a useful venue for exploring these issue further and detailing how the treatment of QFs will be handled in future IRPs. However, the Coalition continues to recommend that, even if that docket has not concluded by the time PGE files its next IRP update or future IRP, the Commission should direct PGE to include an appropriate forecast now and in all future IRPs.

The Coalition wants to remind the Commission that it first raised the issue paying QFs for the capacity benefits they provided to utilities in 2013, and raised the issue of accurately planning for QFs in 2015. Thus, the Coalition has already waited about five to seven years for the Commission to take definitive action to require Oregon utilities to accurately plan for QFs and pay QFs for the capacity benefits they provide.

In the end, this is not rocket science. Estimating QF contracting is far less difficult than forecasting many aspects of its PGE's RFP, including future gas prices, carbon policies, renewable resource mandates, end use consumer loads, etc. Any capable utility should be able to easily come up with reasonable estimates. This is especially the case for PGE, which has years of sophisticated IRP analysis as well as an excellent, professional and extremely competent IRP staff.

Specifically, the Commission should, regardless of whether UM 2038 is final, direct PGE to in this and its next IRP update or IRP: 1) account for the uncertainties of

---

<sup>2</sup> Staff Opening Comments at 27.

QFs reaching their scheduled commercial operation dates or reaching the scheduled commercial operation dates on-time; 2) reasonably forecast and consider the likelihood that new and existing QFs will enter new contracts with PGE in the future; and 3) reasonably forecast and account for its low and high QF sensitivities.

Dated this 6th day of March 2020.

Respectfully submitted,

Sanger Law, PC

A handwritten signature in black ink that reads "Marie Barlow". The signature is written in a cursive style with a horizontal line underneath the name.

Marie P. Barlow  
Irion A. Sanger  
Sanger Law, PC  
1041 SE 58th Place  
Portland, OR 97215  
Telephone: 503-420-7734  
Fax: 503-334-2235  
marie@sanger-law.com

Of Attorneys for Renewable Energy  
Coalition