

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

2019 Integrated Resource Plan

NORTHWEST AND
INTERMOUNTAIN POWER
PRODUCERS COALITION'S
COMMENTS ON THE STAFF
MEMORANDUM

I. INTRODUCTION

The Northwest and Intermountain Power Producers Coalition (“NIPPC”) respectfully submits these Comments in Response to the Staff Memorandum (“Staff Memo”) for consideration by the Oregon Public Utility Commission (“Commission”) on Portland General Electric Company’s (“PGE”) 2019 Integrated Resource Plan (“IRP”). NIPPC filed Opening Comments in this matter on October 11, 2019 and Final Comments on December 17, 2019. NIPPC’s comments address the Staff Memo’s recommendations regarding PGE’s proposals regarding transmission, requests for proposals (“RFPs”), and direct access. NIPPC will not restate all of its prior comments here, but simply provide a brief response to the Staff Memo and a roadmap to where the Commission can find NIPPC’s related comments on some of the topics below.

II. COMMENTS

NIPPC generally agrees with many aspects of Staff’s recommendations on PGE’s transmission, RFPs, and direct access as more fully explained below.

- NIPPC agrees with Staff’s recommendations to modify the Interim Transmission Solution to require PGE to incorporate modifications in the event PGE proceeds with an RFP.¹
- NIPPC disagrees with Staff’s limited recommendations regarding the transmission analysis that should be incorporated in future IRPs. PGE’s original IRP filing essentially sought to identify the least-cost/least-risk generation with no consideration of transmission. The Interim Transmission Solution essentially would apply a “least risk” evaluation of transmission associated with generation resources bid into the RFP. NIPPC, however, continues to recommend that PGE be required to identify that combination of generation resources and associated transmission rights that will result in the least cost AND least risk package of generation and transmission. NIPPC suggests the most effective way to do this is to maximize the use of transmission rights already controlled by PGE’s rate payers; this approach is not “leaning” on PGE’s transmission rights but protects PGE’s ratepayers from taking on incremental - and unnecessary - transmission obligations.
- NIPPC agrees with Staff’s recommendation that PGE’s Direct Access approach should be enhanced and that UM 2024 is the most appropriate forum to explore these issues.² NIPPC’s recommendation in its comments was for the Commission

¹ See Staff Memo at 42.

² *Id.* at 50.

to reject PGE’s analysis with respect to the risks associated with direct access,³ however, NIPPC is persuaded that UM 2024 is the best place to address this issue.

- NIPPC agrees with Staff and PGE that the Commission acknowledge PGE’s Dispatchable Capacity RFP (Action Item 3B) and that PGE has not provided enough detail to move forward with a streamlined RFP process.⁴ NIPPC further agrees with Staff’s recommendation to condition the acknowledgement on PGE engaging in a rigorous stakeholder process prior to the selection of the independent evaluator (“IE”) and to update and refine its capacity needs and transmission requirements prior to issuing the capacity RFP.⁵
- NIPPC disagrees with Staff’s primary recommendation to not acknowledge the standalone Renewable RFP, but agrees with Staff’s second alternative recommendation to acknowledge, subject to conditions, PGE’s upcoming Renewable RFP (Action Item 2). NIPPC’s recommendation in its comments was that the Commission acknowledge PGE’s IRP subject to conditions and that PGE not be allowed to take the “fast track” its Renewable RFP in its upcoming IE selection docket.⁶ NIPPC has not changed its recommendation; however, Staff’s second alternative recommendation for PGE to conduct a rigorous stakeholder process prior to the selection of an IE and filing of a draft RFP addresses NIPPC’s concern on this issue.⁷ NIPPC notes, however, that the Commission should

³ NIPPC Opening Comments at 21-25; NIPPC Final Comments at 10-13.

⁴ See Staff Memo at 21.

⁵ See Staff Memo at 23.

⁶ NIPPC Opening Comments at 25-36; NIPPC Final Comments at 13-19.

⁷ See Staff Memo at 37.

provide PGE guidance on how to weigh economic opportunities against forecasted needs when considering its procurement options. NIPPC also: 1) supports Staff's recommendation that PGE may not submit a benchmark resource to its Renewable RFP; 2) opposes Staff's recommendations on PGE's risks of proceeding and PGE's assumptions regarding Renewable Energy Certificate values, and 3) does not take a position on Staff's recommendations regarding a cost containment screen. Therefore, there is no further action the Commission need take on this issue, if it accepts Staff's alternative recommendation as modified above.

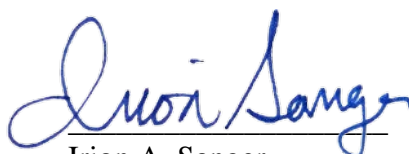
III. CONCLUSION

For the reasons articulated above and in NIPPC's Opening and Final Comments, NIPPC continues to recommend that the Commission acknowledge the IRP, subject to the exceptions discussed above and in earlier comments.

Dated this 6th day of March 2020.

Respectfully submitted,

Sanger Law, PC

A handwritten signature in blue ink that reads "Irion Sanger". The signature is written in a cursive style and is positioned above a horizontal line.

Irion A. Sanger
Marie P. Barlow
Sanger Law, PC
1041 SE 58th Place
Portland, OR 97215
Telephone: 503-756-7533
Fax: 503-334-2235
irion@sanger-law.com

Blue Planet Energy Law, LLC

/s/ Carl Fink

Carl M. Fink
Blue Planet Energy Law
628 SW Chestnut St.
Portland, OR 97210
Telephone: 503-819-4188
cmfink@Blueplanetlaw.com

Attorneys for the Northwest and
Intermountain Power Producers Coalition

/s/ Henry Tilghman

Henry Tilghman
Tilghman Associates
1816 NE 53rd Ave.
Portland, OR 97213
Telephone: 503-702-3254
hrt@tilghmanassociates.com

Consultant for the Northwest and
Intermountain Power Producers Coalition