

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 80

In the matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 Integrated Resource Plan and Clean
Energy Plan.

ROUND 1 COMMENTS OF THE
OREGON SOLAR + STORAGE
INDUSTRIES ASSOCIATION

I. INTRODUCTION

Pursuant to the Ruling issued July 14, 2023, the Oregon Solar + Storage Industry Association (“OSSIA”) hereby submits these Phase 1 Comments on Portland General Electric Company’s (“PGE’s”) 2023 Integrated Resource Plan (“IRP”) and Clean Energy Plan (“CEP”). In addition to supporting the joint comments submitted by the Energy Advocates, OSSIA provides the additional comments below. OSSIA is still reviewing the impacts of PGE’s updates filed in its Addendum and reserves the right to revise its positions or provide further comment in this docket. These comments focus on PGE’s failure to provide adequate draft avoided cost information and OSSIA’s concern with PGE’s calculation of capacity for solar and storage resources. OSSIA hired an expert and was an active participant in this Commission’s generic capacity investigation docket, UM 2011. This is PGE’s first IRP since the Commission adopted the capacity contribution best practices in that docket. Therefore, OSSIA recommends the Commission pay careful attention to PGE’s capacity calculations in this docket and their impacts on avoided costs.

II. COMMENTS

A. **OSSIA Recommends that the Commission Direct PGE to Provide Draft Avoided Cost Information Required under OAR 860-029-0080(3).**

OSSIA recommends that the Commission direct PGE to provide the draft avoided cost information it is required to file with its IRP under OAR 860-029-0080(3) and that the Commission should decline to acknowledge the IRP until PGE does so and condition any acknowledgement on PGE providing the same in future IRPs. The Commission's rule requires that "[e]ach public utility must file with the Commission draft avoided-cost information at the time it files its integrated resource plan and file final avoided-cost information within 30 days of a Commission decision of acknowledgement of the integrated resource plan to be effective 30 days after filing."¹ PGE claims that it satisfied the requirement by listing "the different components of the avoided costs as used in Schedule 201 and where they can either be found or developed based on the information within the CEP/IRP."² However, this information is not the same thing as a draft of avoided costs.

IRP inputs feed into avoided costs. While all those inputs are subject to challenge in the subsequent avoided costs docket, the Commission's rule requiring that draft avoided costs be provided at IRP filing is intended to provide stakeholders with notice of how the IRP will impact avoided costs so that stakeholders can evaluate those inputs in the context of the IRP itself. OSSIA cannot adequately evaluate these IRP inputs, including the capacity values, until it sees how those feed into the avoided cost calculation.

Stakeholders should not be required to find or develop information necessary for the calculation of avoided costs. Rather, the information required to be provided in draft form at the

¹ OAR 860-029-0080(3).

² PGE Reply Comments at 60 (emphasis added).

time of IRP filing should be identical in structure and format to that which is provided in final form within 30 days after the Commission's acknowledgement decision. PGE's response in insufficient to meet the requirement and places an unfair burden on interested parties. As such, OSSIA recommends that the Commission direct PGE to file the appropriate draft avoided costs prices, decline to acknowledge PGE's IRP until they have done so, and condition any acknowledgement decision on PGE providing the same in future IRPs. Further, additional process should be provided for stakeholders to adequately review PGE's draft avoided costs and the applicable IRP inputs given that PGE has not timely satisfied its regulatory filing requirement.

B. OSSIA Remains Concerned About PGE Capacity Values.

OSSIA recommends the Commission pay close attention to PGE's capacity values in this first IRP following the conclusion of the Commission's generic capacity investigation docket, UM 2011. PGE's Reply Comments and Addendum noted a significant error in its calculation of capacity factors for hybrid resources. "The error resulted in capacity factors that were 33% to 40% of what they should have been. (Table 5) As a result, the potential energy benefits of hybrid resources were underestimated in modeling."³ "The correction to hybrid capacity factors has resulted in the model shifting to selecting hybrid resources rather than standalone storage and solar. 1010 MW of hybrid resources are added through 2030."⁴ This shift is significant. OSSIA remains concerned about PGE's capacity values and is continuing to review the IRP and Addendum and reserves the right to provide further comment. PGE's provision of required draft avoided cost information would also facilitate OSSIA's review so that OSSIA is not required to find and develop the necessary information to re-create draft avoided cost.

³ PGE Reply Comments at 55.

⁴ PGE Addendum at 24.


III. CONCLUSION

In addition to its support of the Energy Advocates comments, OSSIA submits the above recommendations for Commission consideration.

Thank you for your attention to these comments.

Dated this 27th day of July 2023.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jack R. Watson". The signature is written in a cursive style with a large initial "J" and "W".

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