



June 21, 2024

Portland General Electric
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Submitted via LC 80 docket at Oregon Public Utility Commission

Re: Comments of Form Energy - LC 80 - Portland General Electric Company's Request for Information Proposal

Form Energy appreciates the opportunity to comment on Portland General Electric Company's (PGE's) proposed Request for Information (RFI), which it has created in response to the Oregon Public Utility Commission's Order No. 24-096, in Docket No. LC 80. Form Energy would be pleased to discuss its comments further with the company, and hopes these comments will help PGE maximize the useful and relevant information it will receive in response to the RFI as it seeks to identify options that will assist in its planning to meet its clean energy requirements.

The RFI should broadly solicit information about new resources that will help PGE meet its future clean energy goals

Form Energy understands the purpose of PGE's RFI to be a tool for identifying resources that PGE may rely on in the future, as it makes progress toward complying with the clean energy mandates of Oregon's decarbonization law. PGE describes the RFI as a "key tool to understand actions to enable future procurement" that would help it in this regard.¹ PGE identifies the value as gaining information about "resources that could come online later this decade and in the 2030s," and that the information could be useful "both from a market signal perspective and in terms of preparing the grid for new technologies and locations."² PGE notes that it is "incredibly important to have visibility into actions required today to ensure [PGE] can achieve HB 2021 goals and meet customer demand."³ Finally, among other goals, PGE describes its hope that the RFI will be useful in understanding the various technologies that could help meet its future loads, and that the RFI results "will inform how long lead-time resources are contemplated in future IRPs, appropriate commercial structures required for development to initiate, and the role required of utilities such as PGE for projects to move forward."⁴

¹ June 7, 2024 filing at 1.

² *Id.* at 2.

³ *Id.*

⁴ *Id.*

In light of these broad and important purposes of the RFI, Form Energy recommends that it be structured to maximize the receipt of information that will be useful to PGE in its efforts to identify resource options for decarbonizing its system. In this effort, Form believes it would be important for the company to not limit responses to preconceived technology options. Also, Form recommends that the company consider all resource types that would be deployable within the timeframes it has targeted, regardless of the current status of those resources within the development process.

Form Energy recommends that the RFI more expansively define the resources about which it seeks information

The draft RFI requires submitters to identify their resource types, specifically listing various categories. Those categories, however, generally presume the specific technologies that would be bid. Although the form allows a submitter to identify its technology as “Other” (with a description), Form Energy finds that the list may unintentionally limit or imply favor for certain technology types from a preconceived list of the resource technologies that are available.

As an example, Pumped Hydro, Green Hydrogen, and Lithium-ion Battery Storage are each specifically listed. Each of these technologies would support some of PGE’s operations by storing energy for later dispatch. Form Energy points out that its technology, 100-hour duration iron-air multi-day energy storage, performs a similar function on the grid, albeit with different technology, costs, safety benefits, duration, and operational characteristics. It would seem preferable for the RFI to not list certain technology types that provide energy storage services, and relegate others to the “other” category, as this could (likely unintentionally) cause a perception that the listed resources are favored, and “other” resources are less favored.

Form Energy would recommend that the list either 1) be expanded, to list other technology types that provide similar services to those that are listed, or 2) create categories that more generically describe the resource types by function, such as “short-duration energy storage,” “long-duration energy storage,” “multi-day energy storage,” “grid enhancing technologies,” etc. This approach would be more consistent with an expansive request for the various technologies that could support PGE’s system, regardless of if they are currently known by PGE.

Form Energy recommends that the RFI not constrain information about future resources to a description of their location, commercial operation date, or other site-specific information

Although the purpose of the RFP is to expand PGE’s view of the various resources that will enable its clean energy future, the proposed RFI appears to restrict projects to those that are geographically constrained, or at a certain point along the development cycle. The RFI does this by soliciting information that assumes, for example, a project site is identified, transmission service is already requested, and an operational use case has been determined. Such an approach could limit PGE’s consideration of resources to those that are already at a certain phase of development, even though PGE intends the RFI to provide information that could signal what efforts it should take in market development.

Form Energy believes that the RFI may be most effective at achieving its purposes if it solicits all available and relevant information about a resource type. This could include, but would not be limited to potential sites, transmission arrangements, etc. Form Energy believes it is important to remove these requirements in order to ensure that PGE does not unintentionally exclude

resource types that could be easily deployed within the timeframes it is analyzing, simply because they have not already chosen a site, for example. Requiring such action before a technology could be considered would seem to erode the ability of PGE to identify actions that it could take to obtain cost-effective resources through “market signaling,” that may not already exist—one of the express purposes of the RFI.⁵

The RFI should capture information about all resource types that have not been analyzed in PGE’s IRP processes if they would be available within the timeframes relevant to the RFI

Because the intent of PGE’s RFI is to identify resources that could assist it in the future, and to help it assess whether and how to incorporate those options into its IRP processes, PGE should encourage the submission of all resources that can help decarbonize its system, and which have not been analyzed in its IRP processes. This group of resources is more expansive than those that will be solicited by PGE’s current Draft RFI. Form Energy understands that the purpose of the RFI is to look at “long lead time” resources, but would encourage PGE to define that expansively enough to include all resource types that have not yet been analyzed by PGE in the formal IRP process, and which could be deployed on its system to help it meet its clean energy requirements.

The RFI should be restructured to allow narratives and other specific information about resource types

Rather than the proposed approach of identifying resources by their development stage and site-specific elements, the RFI would likely better serve the purposes PGE seeks if it were to be restructured to allow descriptions of technology types, and how those could be deployed to assist PGE in the future. In that regard, it would likely be more effective to structure the RFI to seek narratives, business plans, technology verifications, etc. rather than confine the responses to site-specific project elements. This information would help PGE better understand the types of technologies and resources that may benefit its customers in the future, and allow it to give appropriate consideration to those resources in future IRPs. While it may make sense for PGE to inquire about whether specific sites already exist for such projects, it should not limit the RFI to only such resources.

Thank you for the opportunity to comment on PGE’s RFI.

Sincerely,

/s/ Jason Houck
Jason Houck
Director of Policy
Form Energy

⁵ *Id.* at 2.