

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 80

In the Matter of
PORTLAND GENERAL ELECTRIC,
2023 Integrated Resource Plan and
Clean Energy Plan.

COMMENTS OF
RENEWABLE NORTHWEST
ON PGE'S REQUEST FOR
INFORMATION PROPOSAL

COMMENTS

Renewable Northwest (“RNW”) appreciates the opportunity to submit these comments on PGE’s proposed 2024 Long Lead-Time Request for Information (“RFI”), filed with the Oregon Public Utility Commission on June 7, 2024. As PGE notes in its filing, the proposed RFI was “contemplated by PGE and stakeholder comments in LC 80 and directed by the Public Utility Commission of Oregon (OPUC) by Order No. 24-096” in order to identify both resources that may be able to help the company meet its clean energy needs in the 2030s and potential barriers to bringing those resources onto PGE’s system. PGE’s summary of the RFI’s purposes -- to build market intelligence, support preparation of the grid for future resource additions, and improve understanding of key development criteria -- squares well with our understanding.

As a major proponent of the RFI concept, RNW appreciates PGE’s work to develop a strong proposal on a reasonable timeline. After reviewing PGE’s submission and consulting with our members, we offer the following suggestions to improve the RFI and ensure robust feedback from the developer community:

1. RNW encourages PGE to revise its resource categories

The proposed RFI currently defines resources by technology -- onshore wind, offshore wind, solar, lithium-ion battery, pumped hydro, green hydrogen, and “other”. There are many additional technologies that may be commercially available in the 2030s. Just to name a few, iron-air battery, compressed air energy storage, and enhanced geothermal technologies all have developers who are actively exploring development potential in the Northwest. To ensure that these promising new technologies are reflected in the RFI, RNW recommends that PGE consider revising its resource categories to focus on resource characteristics rather than technology. Generation and storage resource categories could include renewable energy generation, non-emitting energy generation, short-duration storage, long-duration storage, and non-emitting flexible capacity.

We similarly recommend that PGE not limit the RFI to only generation and storage resources. The RFI could provide an opportunity to learn more about proposed transmission projects, grid modernization opportunities, or even new projects designed to combine generation- and demand-side resources into virtual power plants. We understand that transmission projects could be particularly valuable to PGE to help provide access to geographically and meteorologically diverse clean resources. We support PGE's exploration of generation, storage, transmission, and other less easily categorizable resources that could support its post-2030 planning efforts; the RFI seems like an ideal means of gathering information on a broader suite of potential resources than currently appears to be contemplated by the proposal.

2. RNW recommends modifications to the requested information

RNW also recommends that PGE make two main modifications to the project-specific information it is requesting:

First, we suggest that PGE specify that all project-specific information is optional. Failing to so specify could discourage prospective responders from providing valuable information simply because they cannot provide *all* the information PGE is requesting. For example, some storage resources are modular and therefore a project can be modified on a relatively short time frame to accommodate PGE's needs and constraints, while an offshore wind project will likely need to secure a lease for a specific lease area from the Bureau of Ocean Energy Management several years before becoming commercially operational. Each of these project types will have different information that can be provided at this early juncture. Similarly, some responding resources may likely be commercially available in the 2030s but may not yet have reached the point of deciding where to seek interconnection. And, of course, if PGE expands the RFI to include transmission and other resource types, the requested information may not apply to those resources at all. Explicitly noting that all project-specific information is optional will encourage a broader response to the RFI -- and therefore more information for PGE.

Second, we suggest that PGE invite narrative responses as part of the RFI. The value proposition here is essentially the same: narrative responses may provide information that PGE had not contemplated in preparing the RFI, but that ultimately proves useful to the company in planning for 2030.

3. PGE should address protection of commercially sensitive information

Finally, in discussing the RFI with members, RNW heard some concern that information responsive to the RFI's prompts may be considered commercially sensitive. To address this concern and ensure robust response to the RFI, we recommend that PGE address up front how it will protect commercially sensitive information from disclosure to potential competitors. We

have no specific suggestion as to how PGE should accomplish this, but note that addressing the issue up front may be necessary for a full response to the RFI.

Once again, we appreciate PGE's work to develop and timely release the RFI, as well as the opportunity to provide these comments. We hope the RFI will ultimately help inform PGE's long-term resource planning as the company works to lead the nation in driving carbon emissions out of the electricity sector.

Respectfully submitted this 21st day of June 2024,

/s/ Max Greene

Renewable Northwest
421 SW 6th Ave., Suite 1400
Portland, OR 97204
503-223-4544
max@renewablenw.org