September 9, 2005

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 2148
Salem OR 97308-2148

Re: In the Matter of An Investigation into Least Cost Planning Requirements
OPUC Docket No. UM 1056

Dear Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric's Opening Comments. This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

/S/ J. RICHARD GEORGE
on behalf of V. DENISE SAUNDERS

VDS:am

cc: UM 1056 Service List

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1056

In the Matter of An Investigation into Least Cost Planning Requirements	)))	OPENING COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY

Portland General Electric Company (PGE) appreciates this opportunity to comment on the Proposed Guidelines and Initial Responses to Integrated Resource Planning Requirements that Staff has proposed in this docket. Staff's work represents a great deal of thought and interaction with all of those interested in these issues and we appreciate the effort represented by these pieces.

We have organized our comments as follows. First, we offer several "big picture" comments. What is true of Integrated Resource Planning ("IRP") itself is true here: the big picture is critical to understanding the outcome of choices regarding myriad facts, models, assumptions, and so forth. Second, we provide a set of guidelines alternative to those Staff provided, proposed as changes to the original IRP order, Order No. 89-507. This format facilitates a direct comparison to the original order. We are using this format not to suggest that all the Commission need do is accept the changes, but to reinforce one of our big picture comments: the IRP process in Oregon generally works. We note that the Commission so indicated in the June 6, 2005 Hearings Officer Memorandum adopting the issues list in this proceeding. Order No. 89-507 has several critical sections to which we show the changes we propose to account for issues that have arisen and experience we all have gained since 1989. Where it is not obvious, we provide an explanation for the changes we suggest. Third, we

support most comments PacifiCorp is filing in this Docket. PacifiCorp's detailed discussion of the many issues complements our approach.

The Big Picture

I. Process Should Serve Purpose

Process guidelines need to support the purpose they attempt to serve; those that do not support the purpose simply impose unnecessary cost and waste valuable resources of all participants. For IRP, the purpose of the process is to enable a utility to make, with respect to its resource portfolio, decisions that have the highest likelihood of resulting in a portfolio that provides the best combination of expected costs and associated risks and uncertainties to provide the service customers require. No one – the utility, the Commission, nor interested parties – can guarantee that the best combination of expected costs and associated risks and uncertainties will actually occur. Indeed, it would be impossible to make such a determination because, once a decision is made, one cannot know what would have occurred had the decision not been made. Thus, the focus of the IRP process is on excellent decision-making.

Excellence in decision-making requires, at a minimum:

- Explicit and clear reasoning for each decision;
- Use of facts and analyses as necessary to enable and add depth to reasoning; and
- Strong consideration of a wide range of views, both on the reasoning and the use of facts and analyses.

The original IRP order served this purpose and any update should do so as well.

II. Objectives and Conventions, Not Requirements, Will Serve the Purpose Best

The history of Oregon IRP shows much experimentation. Depending on the decisions to be made, utilities and process participants have created, adapted, and used many analyses, models and techniques to achieve sound decision-making. This flexibility to adapt is a key

strength of Oregon's IRP process. Based on this, PGE suggests that the Commission not adopt Staff's prescriptive approach of numerous, detailed, requirements for each planning process. Instead, we suggest objectives to inform the utility's and participants' choices within a given process and "conventions" to establish what the Plan will include unless, given the particular circumstances, it makes more sense to do something else. Doing so will allow a new IRP order to stand the test of time and remain effective and relevant as the energy market evolves and new resource planning challenges and paradigms arise.

Selected Changes to Order No. 89-507[1]

III. Definition of Integrated Resource Planning

A. Proposed changes to Order 89-507, p. 2

Integrated Resource Planning (IRP) ~~Least-Cost Planning~~ is an approach to utility planning which requires consideration of all commercialized ~~known~~ resources for meeting the utility's load, including those which focus on the generation and purchase of power and related transmission, or the "supply side," and those which focus on conservation and load management, the "demand side." The term also includes the review and eventual acknowledgment of ~~a least cost~~ an integrated resource plan by the Commission.

The result of the process is the selection of that mix of options which yields, for customers and society over the long run, the best combination of expected costs and associated risks and uncertainties ~~variance of costs~~. Including risks and uncertainties assures that the selection considers ~~The variance reflects~~ the risk of ~~bad~~ outcomes not occurring as planned, such as energy shortage or substantial excess capacity. A resource strategy that offers the lowest expected costs may ~~not be best if it results~~ nonetheless result in unacceptably high costs under uncertain future conditions (e.g., when very high or very low load growth occurs). If no resource strategy offers the lowest expected costs and lowest ~~variance of costs~~ risk, then the utility should explain its balancing of those two characteristics in selecting the best strategy.

The Commission believes that ~~LCP~~ IRP provides a well organized, thorough, and flexible method of utility planning. It also provides for a cooperative approach to the planning

[1] There are some sections of Order 89-507 that would be unnecessary in any update because they addressed issues particular to 1989 and the start of least cost planning. In our opinion, these include the following sections: "Implementation of LCP in Oregon" (p. 4), "Proposed Schedules" (p. 5), "Possible Development of Administrative Rules" (p. 6), and some of "Other Issues" (p. 9 – 12). Some of the material reflected in these parts of Order 89-507 are captured in edits to the parts we cover above.

process, and, as set out in this order, will offer a significant opportunity for public participation.

B. Explanation

These changes simply replace references to least cost planning with integrated resource planning and clarify the notion of "variance of cost" with the phrase "risks and uncertainties," which we suggest using again in the list of IRP conventions. We also add customers to society as the intended beneficiaries of the selection. Other changes are just for readability; no content change is intended.

IV. Reason for Adopting Least-Cost Planning

A. Proposed Changes to Order 89-507, p. 2-3

The goal of ~~utility planning~~ IRP is to assure an adequate and reliable supply of energy with the best combination of the expected costs and associated risks and uncertainties that is also ~~at the least cost to the utility and its customers~~ consistent with the long-run public interest. Long-run public interest is included as part of the goal because not all costs of a supply- or demand-side resource are necessarily borne by the utility and ~~ratepayers~~ customers. Nor are all costs readily quantifiable. However, it is the Commission's intent that all costs should be considered in the planning process and that their effect on the public interest should be a factor in determining a plan's resource mix.

The goal of ~~least-cost planning~~ IRP is most likely to be attained if all of the options available for providing service are considered and if all the costs are considered. ~~Least-cost planning~~ IRP, as envisioned in this order, requires that broad examination of all the choices. Accordingly, the Commission concludes that the traditional responsibility of the utilities for prudent management now explicitly includes the ~~least-cost planning~~ IRP process and the timely acquisition of the ~~least-cost~~ identified resources. Utilities are expected to carry out the actions proposed in their ~~least-cost plans~~ IRPs, or when circumstances dictate other actions, in accordance with ~~least-cost planning~~ IRP principles.

~~Least-cost planning~~ IRP differs from traditional planning in three major respects. It requires integration of supply and demand side options. It requires consideration of other than ~~internal~~ costs currently internal to the utility in determining what ~~is "least-cost"~~ has the lowest expected cost. And it involves the Commission, the customers and the public prior to the making of resource decisions rather than after the fact. The Commission believes that such an approach is necessary and consistent with its statutory obligation to represent customers and the public generally in matters over which it has jurisdiction and to obtain for customers and the public adequate service at fair and reasonable rates.

~~The changes in procedure will be salutary. The decisions made by a utility in meeting its service requirements may have enormous economic and environmental effects. The traditional decision-making process has, however, provided limited opportunity for public participation. Furthermore, the process has tended to restrict the Commission's participation to an after-the-fact review.~~

~~Least-cost planning~~ IRP as mandated by this order will allow the public as well as the Commission to participate in the planning process at its earliest stages. Both may provide information as well as receive information. This broad participation at the beginning and at each decisive step of the planning process should enhance the quality of the information available to the decision-making utility and thus lead to better resource planning. In addition, although a decision made in the ~~LCP~~ IRP process does not guarantee favorable rate-making treatment, the process should provide some guidance to a utility. The diversity of opinion presented during the process and the ~~biennial updating of reports~~ regular updates and schedule for recurring IRP cycles should reduce the likelihood of inaccurate estimations of new resource requirements. The openness of the process and participation in it by the public and the Commission should reduce the uncertainty regarding the rate-making treatment of a utility's acquisition of new resources. Furthermore, the open and collaborative character of ~~Least-Cost Planning~~ IRP may foster elevated confidence among those affected by the decisions and may make the process more responsive to demonstrated needs.

An additional benefit of ~~LCP~~ IRP is that it will provide the Commission with more consistent information about a utility's plans and activities over a period of time and will allow more accurate comparisons among utilities in Oregon and throughout the Pacific Northwest. ~~Least-Cost Planning~~ IRP will also make available to the Commission information which will be useful in other proceedings, such as review of avoided cost and special contract filings.

The reasons for the adoption of IRP have not changed significantly with recent changes to industry structure at both the state and federal levels. With respect to wholesale markets, developments here have simply increased the supply-side resource choices available to utilities. With respect to retail service, non-residential customers of both natural gas and electric utilities (except Idaho Power Company) have a choice of suppliers for their natural gas or electricity commodity, but such customers also remain entitled to receive natural gas or electricity from utilities on a cost-of-service basis. This ability to choose requires that utilities make an assumption about the amount of load likely to opt for alternate service but does not eliminate the need to plan for the cost-of-service provision of natural gas and electricity.

Similarly, the adoption of a public purpose charge by PGE, PacifiCorp, and Northwest Natural Gas Company and the administration of the funds collected by the Energy Trust of Oregon (ETO) require that utilities coordinate with the ETO on assumptions regarding demand-side resources and certain renewable resources but does not eliminate the need to consider these resources within IRP. The ETO should provide its targets for the

acquisition of energy efficiency and ability to assist in the funding of renewable resources the costs of which are above market.

B. Explanation

The changes to the old text are similar to those in the previous section. Again, we think these words have served Oregon's IRP well and can continue to guide future planning with just minor changes. We eliminated a paragraph that is no longer relevant, and we added two paragraphs to address changes in the industry since 1989. They are brief but cover wholesale market changes, retail market changes and the ETO.

V. Procedural Elements

A. Provided in Order 89-507 (p. 5-6)

1. The public and other utilities should be allowed significant involvement in the preparation of the plan. That participation must include opportunities to contribute information and ideas as well as to receive information. It must also include the opportunity to make relevant inquiries of the utility formulating the plan. Any disputes which arise about whether information requests are relevant or unreasonably burdensome or whether a utility is being properly responsive may be submitted to the Commission for resolution.

2. Competitive secrets must be protected, either through the procedures presently used by the Commission, such as protective orders, or through aggregation or shielding of data, or some other mechanism.

3. ~~So that the Commission is apprised of the costs associated with this approach to planning, the utility should also submit an itemized estimate of the amount by which the costs of preparing an LCP differ from the costs of current planning efforts. The cost estimate shall be filed within 45 days of this order.~~ Utilities should engage in IRP and file a proposed Action Plan and supporting documentation as often as necessary to assure that the process and substance of IRP underlie major resource decisions. Utilities should file a new IRP no later than three years after acknowledgement of the prior IRP.

4. The utility must file ~~interim reports outlining its progress on development of the plan. The first will be due six months after approval of the schedule~~ a status report annually by the anniversary date of an acknowledged IRP, until that IRP is displaced by a subsequent new IRP filing. A status report should include an assessment of what has changed since the IRP filing, actions taken under the IRP, and deviations from the proposed or acknowledged Action Plan.

5. ~~Parties may request supplemental orders at any time for the purpose of clarifying or modifying the Commission's directives. The Commission does not, however, want a utility's planning process delayed unnecessarily because of such requests and may choose to defer its consideration of some requests until the utility's plan is filed, When LCP is well-established, all parties should be able to proceed with only occasional instruction from the Commission.~~ Prior to filing of the IRP, utilities and participants should follow the schedule that best meets the needs for interaction and plan development. Once a utility files its IRP and proposed Action Plan, the Commission will engage in a formal review process, including written and oral comments. This will include a presentation by the utility of its plan at a public meeting prior to the deadline for written public comment. In general, Commission Staff and interested parties should complete their review within six months of the IRP's filing. The Commission will consider acknowledgement at a public meeting. If the Commission finds that an IRP requires further work before acknowledgement can occur, it will so indicate to the utility. This process should ultimately lead to acknowledgement.

~~6. The utility and the Commission staff should work closely together on this project. The staff may also, of course, request additional orders.~~

B. Explanation

The changes incorporate most of Staff's guidelines into an update to the procedural section of the old Order.

VI. Roles

A. Described in Order 89-507 (pp. 2-1.6, 2-1.7):

The establishment of ~~Least Cost Planning~~ IRP in Oregon is not intended to alter the basic roles of the Commission and the utility in the regulatory process. The Commission does not intend to usurp the role of utility decision-maker. Utility management will retain full responsibility for making decisions and for accepting the consequences of the decisions. Thus, the utilities will retain their autonomy while having the benefit of the information and opinion contributed by the public and the Commission.

~~Rate-making decisions will not be made in the Least-Cost Planning~~ Decisions on what amount of the costs of a resource action to include in a utility's revenue requirement will not be made in the IRP process. For example, if a resource was constructed or a contract purchased at unnecessarily high cost, only the cost deemed appropriate would be placed in revenue requirement. Thus, the prudence of the utility's decisions regarding a resource are not relevant to the question of inclusion in revenue requirement, but are relevant in determining amount included. Portland General Electric, Order No. 87-1017. ~~Decisions on whether to include in rates the costs associated with new resources~~ Rate decisions can

only be made in a rate filing under ORS 757.205, et seq. When a utility requests ~~approval of expenditures or inclusion of a plant in rate base~~ any change in revenue requirement and rates, whether for a resource action or other cost change, the utility must demonstrate and the Commission must find the justness and reasonableness of its rates, in total, at ~~the~~ that time ~~the resource comes on line. Under ORS 757.355, the cost of a resource may be included in rates only if the resource is "used and useful."~~ The resources must be available for service when inclusion in rates is requested.

~~If a resource is used and useful, the resource itself must be included in rate base. However, the full cost of the resource is not necessarily includable in rate base. For example, if a used and useful resource was constructed at unnecessarily high cost, only the cost deemed appropriate would be placed in rate base. Thus, the prudence of the utility's decisions regarding a resource are not relevant to the question of inclusion in rate base, but are relevant in determining the valuation of the facilities to be placed in rate base. Portland General Electric, Order No. 87-1017, at 10.~~

~~Least-Cost Planning~~ IRP is therefore relevant to the question of rate-making treatment. Consistency of resource ~~investments~~ actions with ~~least-cost planning~~ IRP principles will be an additional factor that the Commission will consider in judging prudence. When a plan is acknowledged by the Commission, it will become a working document for use by the utility, the Commission, and any other interested party in a rate case or other proceeding before the Commission, such as the review of avoided costs. Consistency with the plan may be evidence in support of favorable rate-making treatment of the action, although it is not a guarantee of favorable treatment. Similarly, inconsistency with the plan will not necessarily lead to unfavorable rate-making treatment, although the utility will need to explain and justify why it took an action inconsistent with the plan.

B. Explanation

The changes above update the old Order's decision for the reality that many resource actions today may be contractual arrangements, not rate base plant. Thus, references to "rate base" change to "revenue requirement." The content is otherwise unchanged. Again, it has served us all well for over 15 years.

VII. Substantive Elements

A. As provided in 1989 Order (p. 7)

1. ~~All resources must be evaluated on a consistent and comparable basis.~~ Assess on a consistent basis the expected costs of all commercialized resources available at the time of the decision. A set of actions that result in lower use of energy (such as energy efficiency measures and demand response) is a resource to the same extent as a set of actions that result in additional energy.

2. ~~Uncertainty must be considered.~~ Consider how both risk and uncertainty can affect the preferred portfolio decision.

3. ~~The primary goal must be least cost to the utility and its ratepayers consistent with the long-run public interest.~~ Explain how and why the resource portfolio selected yields the best combination of expected costs and associated risks and uncertainties.

4. ~~The play must be~~ Demonstrate how the resource portfolio is consistent with the ~~energy policy of the state of Oregon as expressed in ORS 469.010.~~ long-run public interest as expressed in state of Oregon and federal energy policies.

B. Explanation

We expressed these substantive elements using transitive verbs to indicate their active nature. They are generally consistent with the overarching substantive requirements included in Staff's proposal. Many of the more detailed provisions of Staff's proposal are included below as planning conventions. We have kept the list of substantive elements short and simple because these are the objectives that the planning conventions should serve. In other words, all of the facts gathered, analysis done, and modeling performed should support achieving these objectives. Utilities should do no more than is necessary to achieve the objectives, and should do things other than those listed as conventions if necessary to achieve the objectives. Using broad objectives, and the conventions that we describe below, will keep both discipline and flexibility in the IRP process.

C. List of Planning "Conventions"

PGE proposes that the following list of planning conventions be used in IRP unless a proponent establishes that it makes more sense, given the purpose of IRP, to do something different. Our list incorporates most of Staff's guidelines including many of those listed as substantive requirements in Section 1 of Staff's proposal as well as those included in Sections 4-15. We explain at the end major changes.

1. Use a planning horizon of at least 20 years, with end effects.

2. Prepare a 20-year load forecast. Identify major drivers of the load forecast and risks and uncertainties related to those drivers. For purposes of the IRP forecast, develop and plan to serve with short-term resources an assumed amount for customer loads that the utility expects may be served by an alternative electricity or natural gas supplier over the planning horizon, or propose an alternative approach.

3. Prepare a 20-year forecast of capacity and energy available from existing resources. Identify the major assumptions used in this forecast and risks and uncertainties related to those assumptions.

4. Develop and support the capacity planning assumption used in the plan, including an analysis of reliability standards, such as appropriate planning margins or resource adequacy requirements, recognizing that higher reliability carries a higher ongoing fixed cost.

5. Assess the costs and specify the attributes of all resources considered in the plan, whether short- or long-term.
   a. Costs include all those, such as regulatory compliance (pollution damage and/or mitigation) with carbon dioxide emissions, with a reasonable likelihood of occurring over the long term, covering at least the life of the resource. Utilities also should analyze the range of potential CO_2 regulatory costs in Order No. 93-695, from zero to $40 (1990$). Sensitivity analyses are no longer required for total suspended particulates.
   b. Costs may additionally include fuel transportation and electric transmission necessary to obtain supply delivered to the utility's service territory.
   c. Attributes include operating characteristics, fuel, technology, safety, lead-time, life span, and general location.
   d. Study periodically the conservation and demand response potential for each utility's entire service territory and use the results to forecast availability of these resources for the portfolio modeling.
   e. Identify the major cost and attribute assumptions used in the assessment and the risks and uncertainties associated with those assumptions.
   f. Where applicable and quantifiable, assess any expected cost savings associated with a given resource not otherwise included in the direct cost estimates for that resource.
   g. Include the cost effects of technological advancements.

6. Discount all future resource costs by the after-tax incremental weighted-average cost of capital.

7. Review regional transmission plans and assess the availability of transmission rights to access resource choices. Explain the effect of transmission availability on resources under consideration in the plan. Consider the effect of fuel

transportation and electric transmission system additions on the availability and costs of incremental resources considered in the planning process.

8. Construct a representative set of resource portfolios to compare present value of revenue requirements (PVRR) and test that PVRR under scenarios of risks and uncertainties most relevant to the period and resource mix under consideration. Scenarios should include a range of cost adders for those environmental requirements or cap-and-trade programs that may reasonably become internal costs over the life of the resources where the impact may be material enough to affect resource selection. Select a portfolio that represents the best combination of expected cost and associated risks and uncertainties for the utility and customers, including the variability of cost outcomes and the severity of potential outcomes.

9. Express energy efficiency and demand-side resources as annual savings targets.

10. Multi-state utilities should plan their generation and transmission systems, or gas supply and delivery, on an integrated system basis that achieves the best combination of expected costs and associated risks and uncertainties for all their retail customers.

11. Identify and explain any inconsistencies between the selected portfolio and state and federal energy policies.

12. Identify and explain any potential barriers to implementation of the selected Action Plan. The regulatory framework and current Commission policies and practices should not discourage the selection of resources that achieve the best combination of cost and associated risk and uncertainty. Utilities should include in the IRP reasoning and analysis regarding any ways in which regulatory policies and practices do not support the resources it would otherwise select.

13. Prepare an Action Plan with resource activities the utility intends to undertake to acquire the identified resources, regardless of whether the activity was acknowledged in a previous IRP.

D. How PGE's Planning Conventions differ from Staff's Straw Proposal

The approach PGE recommends differs from Staff's "Straw Proposal" largely in that it is less prescriptive, maintaining the flexibility of Order 89-507. Specifically, our approach:

- Does not require an acquisition strategy for each resource.
- Allows more flexibility in consideration of conservation, demand response, distributed generation, and other demand-side resources.

- Is less prescriptive on use of risk measures and analytical processes, allowing them to evolve and adapt as needed or as new techniques and concepts emerge.

- Allows for evolution in ETO activities.

PacifiCorp's comments, which we support, discuss these issues in greater detail.

PGE urges the Commission to maintain the flexible approach to IRP that has served Oregon well for the last sixteen years.

DATED this 9th day of September, 2005.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing OPENING COMMENTS OF PORTLAND GENERAL ELECTRIC to be served by electronic and U.S. Mail upon each party on the following official service list in this proceeding:

Dated this 9th day of September, 2005.

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