



JENNIFER MILLER
Direct (503) 595-3927
jennifer@mrg-law.com

April 26, 2021

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-108

Re: Docket UM 2011 – *Public Utility Commission of Oregon, General Capacity Investigation*

Attention Filing Center:

Attached for filing in the above-captioned docket is the Joint Utilities' Reply Comments.

Please contact this office with any questions.

Thank you,

Jennifer Miller
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2011

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

General Capacity Investigation.

**JOINT UTILITIES' REPLY
COMMENTS**

1 Portland General Electric Company (PGE), PacifiCorp dba Pacific Power (PacifiCorp),
2 and Idaho Power Company (together, the Joint Utilities) respectfully submit these reply comments
3 in response to the Energy + Environmental Economics (E3) Whitepaper, filed on
4 December 15, 2020, Staff's Opening Comments, filed on January 14, 2021, and interested parties'
5 initial comments, which were filed on March 8, 2021.¹ The Joint Utilities appreciate the discussion
6 at the March 17, 2021 workshop and the opportunity to provide these written comments.

7 The Joint Utilities recommend that the Public Utility Commission of Oregon (the
8 Commission) adopt high-level and generally applicable principles for valuing capacity, rather than
9 an overly prescriptive and detailed methodology that may not be well-suited to every application
10 and may also be incapable of keeping up with the evolving utility industry. The Joint Utilities
11 further recommend that the Commission not apply the capacity valuation framework determined
12 in this docket to Public Utility Regulatory Policies Act of 1978 (PURPA) matters absent full
13 consideration of these methodologies and the resulting compensation within the context of the
14 Commission's ongoing PURPA proceedings.

¹ Interested parties who submitted comments on March 8, 2021 include: Alliance of Western Energy Consumers (AWEC); NewSun Energy LLC (NewSun); Northwest & Intermountain Power Producers Coalition (NIPPC); NW Energy Coalition (NVEC); Obsidian Renewables LLC (Obsidian); Oregon Solar + Storage Industries Association (OSSIA); Renewable Energy Coalition (REC); Renewable Northwest; and Swan Lake North Hydro, LLC (Swan Lake).

1 Additionally, the Joint Utilities recommend that the Commission adopt the Effective Load
2 Carrying Capacity (ELCC) methodology as a framework for evaluating a resource’s capacity
3 contribution within long-term planning and procurement, consistent with the broad agreement
4 among parties. This will ensure that parties have a common starting point as the Joint Utilities
5 develop modeling applications that work best for their systems and circumstances and incorporate
6 new techniques in the future. Furthermore, the Joint Utilities urge the Commission *not* to adopt
7 capacity valuation methodologies that conflict with the Joint Utilities’ current practices regarding
8 Integrated Resource Plans (IRP).

9 Finally, the Joint Utilities believe Commission should also reject Staff’s recommendation
10 for an arbitrary resource sufficiency period that is contrary to well-established resource planning
11 principles and recommend against forecasting annual resource capacity contributions across the
12 planning horizon to better ensure that customers do not pay for unnecessary capacity in violation
13 of PURPA’s customer indifference mandate.²

14 **A. The Joint Utilities Recommend that the Commission Retain Flexibility and Adopt**
15 **Generally Applicable Principles for Valuing Capacity that are not Overly**
16 **Prescriptive.**

17 The Joint Utilities agree with other parties, such as REC, that the scope and potential
18 outcome of this docket remain unclear.³ Docket UM 2011 was opened in 2019 as an investigation
19 into capacity valuation to develop a general methodology to consider across a broad range of
20 applications, including energy efficiency, demand response, utility resource planning, and

² See, e.g., *In the Matter of Portland Gen. Elec. Co. v. Pacific Northwest Solar LLC*, Docket No. UM 1894, Order No. 18-025 at 7 (Jan. 25, 2018) (“[O]ne critical feature of our implementation of PURPA, including (but not limited to) the terms and conditions of our regulated PURPA contracts, is the need to ensure that ratepayers remain financially indifferent to QF development.”); *In the Matter of Staff’s Investigation Relating to Electric Utility Purchases from Qualifying Facilities*, Docket UM No. 1129, Order No. 05-584 at 11 (May 13, 2005) (“We seek to provide maximum incentives for the development of QFs of all sizes, *while ensuring* that ratepayers remain indifferent to QF power by having utilities pay no more than their avoided costs.”) (emphasis added).

³ See Joint Utilities’ Initial Comments at 4 (Mar. 8, 2021); REC Initial Comments at 2 (Mar. 8, 2021) (“Before proceeding in this docket, the Coalition urges Staff to clarify their vision for this docket.”).

1 Qualifying Facility (QF) avoided cost pricing, among others.⁴ While stakeholders have made
2 significant strides in their understanding of capacity in this proceeding, there is still confusion
3 regarding the ultimate outcome of this investigation, *i.e.*, what Staff will recommend the
4 Commission adopt as a capacity valuation methodology and whether and how that methodology
5 would apply to other dockets and programs.⁵ Specifically, the March 17, 2021 workshop
6 demonstrated that questions still remain as to: (a) how this docket relates to docket UM 2000 and
7 whether it would address capacity valuation matters in the context of PURPA avoided cost pricing,
8 such as the framework for determining utility resource sufficiency and deficiency;⁶ (b) whether
9 this docket would feed into Docket UM 2038, which is investigating treatment of QFs in the utility
10 IRP process;⁷ (c) whether this docket would overlap with Docket AR 631 regarding terms and
11 conditions for standard Power Purchase Agreements (PPAs) by addressing, for example, minimum
12 delivery requirements for intermittent resources and how utilities annually update avoided cost
13 prices; and (d) how the outcome of this docket would impact integrated resource planning.⁸ The
14 Joint Utilities agree with REC that “clarity on purpose is the only way to ensure stakeholders are
15 adequately informed as to the proceedings that may affect their interests.”⁹ Thus, the Joint Utilities

⁴ *In the Matter of Pub. Util. Comm'n of Or., Gen. Capacity Investigation*, Docket No. UM 2011, Order No. 19-155, App. A at 2 (Apr. 26, 2019).

⁵ NWECA Initial Comments at 1 (Mar. 8, 2021) (“[T]here is not currently a clear understanding of the range of PUC regulatory processes that should be informed by the outcomes of this docket.”).

⁶ Joint Utilities’ Initial Comments at 2-3; *see also* REC Initial Comments at 4-5. “Resource sufficiency and deficiency definitions, as applied in a PURPA context, are based upon a broader range of issues than the Joint Utilities’ need for capacity. For example, a utility’s resource deficiency period for renewable resources is currently defined by the anticipated date of a subsequent renewable resource procurement to meet long-term renewable portfolio standard requirements. While the scope of UM 2011 should include discussion of appropriate methods to determine the value of capacity in periods of capacity adequacy and inadequacy, it should not include proposals that adjust the broader notions of resource sufficiency and deficiency as applied in PURPA avoided cost pricing.” Joint Utilities’ Initial Comments at 2-3 n.3.

⁷ REC Initial Comments at 4-5.

⁸ Joint Utilities’ Initial Comments at 3-4.

⁹ REC Initial Comments at 5.

1 urge Staff to squarely address stakeholders’ concerns and provide greater clarity regarding Staff’s
2 view of the outcome of this docket.

3 To aid Staff, the Joint Utilities caution against prescriptive requirements and instead
4 recommend that the capacity valuation methodology adopted here reflect high-level principles of
5 general applicability and leverage a methodology such as ELCC as an initial framework. But the
6 Joint Utilities also suggest acknowledging the evolution of methods to evaluate capacity value.
7 Methodologies for determining and valuing a resource’s capacity contribution are becoming more
8 refined, in part because of more advanced modeling techniques employed for long-term resource
9 planning and also because of rapidly advancing technological developments, such as more
10 widespread adoption of utility-scale storage systems.

11 Over the course of this docket, it has become clear that a single capacity valuation
12 methodology is not necessarily well-suited for all potential applications identified by Staff, which
13 have different purposes and desired outcomes and are subject to different legal and regulatory
14 constraints. Overly prescriptive requirements may hinder a utility’s ability to take advantage of
15 emerging modeling techniques or fully capture new technologies. Moreover, regional efforts to
16 address resource adequacy issues could also impact capacity valuation methodologies and
17 maintaining flexibility will advance, rather than hinder, those regional efforts. Adopting high-
18 level principles of general applicability will ensure that the outcome of this docket does not run
19 afoul of other concurrent investigations or create unintended consequences when applied across
20 various applications. Such a flexible approach has proven successful before where the

1 Commission developed and adopted the resource value of solar (RVOS) methodology but allowed
2 for separate investigations to determine how RVOS would be used in other applications.¹⁰

3 The Joint Utilities thus recommends that the Commission not apply the capacity valuation
4 methodology adopted here to other applications, like QF avoided cost pricing or integrated
5 resource planning, without first testing whether the methodology creates reasonable outcomes
6 when used in a specific application. For example, when evaluating an avoided cost price for QF
7 transactions, the avoided cost of capacity cannot be established in isolation and without
8 consideration of the avoided cost of energy to ensure that the overall payment to the QF does not
9 exceed the utility’s avoided cost. The Joint Utilities continue to recommend that methodologies
10 determined in this docket should not be applied wholesale to other PURPA matters by the
11 Commission, absent significant consideration of utility-specific avoided cost pricing and other
12 relevant factors in the context of those proceedings. The Joint Utilities, therefore, do not support
13 the adoption of prescriptive rules that dictate specific valuation requirements, such as a statutory
14 three-year deficiency period (which is discussed in greater detail below). The generally applicable
15 methodology adopted here should not preclude methodological refinements when applied for a
16 specific purpose.

17 The Joint Utilities believe that all three phases of Docket UM 2011 have been valuable and
18 provided the Commission and stakeholders with a better understanding of what capacity is, how it
19 is acquired, and how it is valued. The Joint Utilities believe this background will prove invaluable
20 to the Commission when it addresses capacity issues in other dockets and other applications.

¹⁰ *In the Matter of Pub. Util. Comm’n of Or., Investigation to Determine Resource Value of Solar*, Docket No. UM 1716, Order No. 17-357, at 17 (Sept. 15, 2017) (“We have not determined how RVOS will apply to community solar (nor any other application), but see value in having parties begin implementation discussions within this phase and not wait until the end of Phase II.”).

1 However, the Commission must remain flexible to changing circumstances and tailor the high-
2 level methodology adopted here to each specific application.

3 **B. There is Broad Agreement among Joint Utilities and Parties Regarding the**
4 **Methodology for Determining Capacity Contribution.**

5 Many parties have reached general consensus on (1) using ELCC generally; (2) using last-
6 in and portfolio ELCC methods; and (3) advising caution for using heuristic estimations.

7 1. Parties Support Use of ELCC Generally

8 The Joint Utilities and other parties support Staff and E3’s recommendations for
9 determining capacity contribution based on the techniques reflected in the ELCC methodology,
10 which is broadly viewed industry wide as the most accurate way to calculate the capacity
11 contribution of resource types including, but not limited to thermal, renewables, storage, and
12 demand response. As a general matter, the Joint Utilities support using ELCC as a framework for
13 evaluating their specific capacity contribution techniques because it uses probabilistic analysis to
14 determine capacity contribution based on loss-of-load probability (LOLP) principles. Similarly,
15 Renewable Northwest commented that it “has long supported use of ELCC to determine
16 capacity[,]”¹¹ NWECC stated that “E3’s advocacy for the ELCC method is welcome[,]”¹² and
17 OSSIA agreed with Staff “that ELCC are a useful way to measure the capacity a resource can
18 provide[,]”¹³ Consequently, stakeholders are in general agreement that ELCC is an appropriate
19 method to evaluate capacity contribution.

20 2. Multiple Stakeholders Support the Use of Last-in and Portfolio ELCC Methods

21 Multiple stakeholders also agree that last-in and portfolio ELCC are sound methods to
22 calculate capacity contribution of a resource as such methods better capture resource additions and

¹¹ Renewable Northwest Initial Comments at 3 (Mar. 8, 2021).

¹² NWECC Initial Comments at 3.

¹³ OSSIA Initial Comments at 4 (Mar. 8, 2021).

1 interactive effects to the system. Renewable Northwest aptly contends that “[l]ast-in ELCC will
2 be more appropriate since it captures the marginal effect of a particular resource addition to the
3 fleet.”¹⁴ The Joint Utilities agree that in most applications, such as QF avoided cost pricing, the
4 last-in ELCC method is appropriate to determine the capacity contribution of a particular resource.

5 The Joint Utilities also agree, however, with stakeholder comments that evaluating capacity
6 contribution for purposes of integrated resource planning includes an assessment of the utility’s
7 entire resource portfolio, inclusive of potential resource additions. NWECC correctly notes that an
8 individual resource “ELCC does not consider the interactive effects of ensemble or portfolio
9 additions to the system... [and] actual procurements increasingly and correctly take an all-source
10 perspective.”¹⁵ When developing an IRP or evaluating a request for proposal (RFP), the Joint
11 Utilities necessarily focus on the *portfolio* of resources that meet the utility’s identified resource
12 need at least-cost and least-risk while ensuring system reliability.

13 3. Stakeholders Acknowledge the Challenges Associated with Heuristic Estimations

14 Stakeholders are in general agreement that the Commission should *not* require the use of
15 heuristic methods to approximate ELCC. Staff and E3 ultimately recommended against using the
16 more simplistic heuristic methods because they may produce inaccurate results.¹⁶ Renewable
17 Northwest agreed that while heuristic methods “reduce the computational effort by either
18 approximating the relationship between capacity added and LOLP or by focusing on some subset
19 of hours that are considered to be high risk for LOLP[,]”¹⁷ such methods fail to capture other
20 factors that influence ELCC, such as maintenance schedules and the hourly operations of utilities’

¹⁴ Renewable Northwest Initial Comments at 7.

¹⁵ NWECC Initial Comments at 4.

¹⁶ Staff Opening Comments at 4, 14-15 (Jan. 14, 2021).

¹⁷ Renewable Northwest Initial Comments at 7.

1 energy systems.¹⁸ The Joint Utilities agree with other parties that heuristic methods, when applied
2 in long-term planning or procurement, could over or under attribute capacity contribution to
3 resources based on approximations of capacity need and resource behavior, which could result in
4 outcomes such as inappropriately crediting a resource with a capacity contribution even when the
5 utility portfolio has no actual remaining capacity need.¹⁹

6 Additionally, heuristic approaches primarily work for generation-only resources, and not
7 for energy storage and hybrid resources as using hourly LOLP heuristics fails to capture the
8 duration of loss-of-load events and the resources' actual operational characteristics.²⁰ The Joint
9 Utilities thus agree with E3, Renewable Northwest, and Swan Lake that hourly heuristic methods
10 do not reflect actual dispatch and locational values for hybrid resources and storage because such
11 methods fail to capture advances in technology and real-world operational capabilities for such
12 resources.²¹ For the foregoing reasons, the Joint Utilities recommend that the Commission not
13 adopt a simplified heuristic methodology for determining capacity contribution for long-term
14 planning or procurement.

15 **C. Capacity Valuation Methodologies in Conflict with Utility IRP Practices Should Not**
16 **be Adopted.**

17 The Joint Utilities recommend that proposed capacity valuation methodologies in conflict
18 with utility IRP practices, such as REC's proposal that all utilities use the exact same capacity
19 contribution model,²² not be adopted. The Joint Utilities agree with Staff that utility-specific
20 capacity contribution models should continue to be used in long-term planning and that each
21 utility's application of capacity contribution in contexts outside the IRP should be consistent with

¹⁸ See *id.*; Swan Lake Initial Comments at 3 (Mar. 9, 2021).

¹⁹ Swan Lake Initial Comments at 3; Joint Utilities' Initial Comments at 5-6 & 6 n.7.

²⁰ Renewable Northwest Initial Comments at 7-8; Swan Lake Initial Comments at 3-4.

²¹ Renewable Northwest Initial Comments at 7-8; Swan Lake Initial Comments at 3-4; E3 Report at 7-8 (Dec. 15, 2020).

²² REC Initial Comments at 15.

1 and faithful to the IRP methodology, which is also used by the Joint Utilities to evaluate resource
2 procurements through RFPs.²³

3 Requiring all utilities to use the same model would conflict with IRP methodology as the
4 uniform model would not recognize essential differences between the utilities regarding the time
5 period of need (summer/winter), the magnitude of need, differences in existing portfolio
6 composition, and other circumstances. Utility-specific models capture these essential differences.
7 Accordingly, the Joint Utilities have each developed a capacity value model specific to that
8 company’s conditions and resources, and it is unclear how REC would propose a uniform capacity
9 valuation model that meets all utilities’ needs. The Joint Utilities also reject REC’s accusation that
10 utilities use utility-specific capacity valuation methodologies to “game” the system, reduce
11 avoided costs, or otherwise confuse parties and Staff regarding differing models.²⁴ Employing
12 utility-specific models to produce more accurate capacity values does not equate to gaming the
13 system; rather, such flexibility is essential to recognize the individual circumstances of each utility
14 and to protect the utilities’ customers from overpaying for capacity.²⁵

15 Adopting capacity valuation methodologies that are inconsistent with IRP and RFP
16 procurement practices would undermine the well-established least-cost, least-risk planning
17 framework that has served customers well for many years and could result in the acquisition of
18 higher-cost resources.

²³ Staff’s Opening Comments at 9-10.

²⁴ See REC Initial Comments at 15.

²⁵ These models also appropriately assess capacity needs so that the utility can develop an action plan to address those needs.

1 **D. Utility Customers Should Not Be Required to Pay for Capacity When It is Not Needed**
2 **to Meet Reliability Targets.**

3 When developing a long-term resource plan, the Joint Utilities use detailed and well-vetted
4 methodologies to determine their forecasted load and then identify the least-cost, least-risk
5 portfolio of resources to reliably serve future load. Historically, the sufficiency/deficiency
6 demarcation date for PURPA avoided costs has been based on when the utility’s resource plan
7 identifies a need for additional capacity resources to reliably serve customers. Before there is an
8 identified need for additional resources, the Joint Utilities do not pay a QF for capacity beyond the
9 capacity costs reflected in forward market prices.²⁶ While this long-standing framework has
10 generally worked well, the Joint Utilities are not opposed to developing a fundamentally different
11 avoided cost framework, which the Joint Utilities understand will be addressed in Docket
12 UM 2000. But the Joint Utilities oppose Staff’s proposal in this case to create an arbitrary and
13 artificial capacity need.

14 Staff proposes a capacity valuation methodology that would assume each utility needs
15 capacity in three years regardless of what the IRP has determined. As a result, Staff recommends
16 that the Joint Utilities begin paying for capacity from QFs immediately and ramp up the capacity
17 payments over a three-year period.²⁷ That is, in year one, the utility would be deemed sufficient;
18 in year four, the utility would be deemed deficient.²⁸ In years two and three, the resource would

²⁶ During the sufficiency period, the avoided cost price is set using a firm market price index, which the Commission has correctly concluded does include a capacity component because it is a *firm* price. But the avoided cost price does not include a separate capacity component, which is applied only during the deficiency period. *See In the Matter of Pub. Util. Comm’n of Or., Staff’s Investigation Relating to Electric Utility Purchases from Qualifying Facilities*, Docket No. UM 1129, Order No. 05-584 at 28 (May 13, 2005); *In the Matter of Pub. Util. Comm’n of Or., Investigation Into Qualifying Facility Contracting & Pricing*, Docket No. UM 1610, Order No. 14-058 at 8 (Feb. 24, 2014) (“The Commission requires electric utilities to set rates based on the cost of a proxy resource during periods of resource deficiency and on monthly market prices during periods of resource sufficiency.”).

²⁷ Staff Opening Comments at 6; *see also* E3 Report at 9-11.

²⁸ Staff Opening Comments at 6.

1 receive partial capacity payments.²⁹ The Joint Utilities disagree with this arbitrary approach—
2 divorcing the capacity need from any assessment of a utility’s actual need—as it does not comport
3 with avoided cost principles generally. In addition, using this approach for PURPA pricing would
4 violate PURPA’s customer-indifference standard by over- or under-compensating resources for
5 capacity, depending on a utility’s specific circumstances at a given time.³⁰ Further compounding
6 the arbitrariness of Staff’s proposal is the fact that it is unclear when the three-year clock starts—
7 at execution of the PPA or the commercial operation date.

8 Staff’s proposal for a standardized deficiency date would not only conflict with current
9 utility IRP practices, but also require utility customers to pay for capacity when such capacity is
10 not needed by the utility to meet system reliability targets. REC’s proposal that capacity should
11 be paid on day one regardless of need is also arbitrary and violates PURPA’s customer indifference
12 principle.³¹

13 In addition, the Joint Utilities agree with stakeholders that Staff should clarify its proposal
14 and specify, for example, whether “year one of a PPA” should begin at contract execution or
15 resource online date.³² The Joint Utilities cannot properly evaluate this proposal without additional
16 information and would need to evaluate such a proposal in the context of a broader investigation
17 into avoided cost payments and frameworks. Accordingly, Docket UM 2000 would be a more
18 appropriate proceeding within which to resolve this matter.

²⁹ See *id.*

³⁰ See *Hydrodynamics Inc.*, 146 FERC ¶ 61,193 at ¶ 35 (Mar. 20, 2014) (referencing *City of Ketchikan*, 94 FERC ¶ 61,293 at ¶¶ 62,061-62 (Mar. 15, 2001)) (“[A]voided cost rates need not include the cost for capacity in the event that the utility’s demand (or need) for capacity is zero. That is, when the demand for capacity is zero, the cost for capacity may also be zero.”).

³¹ REC Initial Comments at 10-12.

³² See REC Initial Comments at 11; NewSun Initial Comments at 4-5 (Mar. 8, 2021).

1 **E. Customers are Exposed to Risk when Attempting to Forecast Capacity Contributions**
2 **Across a Resource’s Useful Life**

3 Currently, the Joint Utilities establish a resource’s capacity contribution through ELCC or
4 a probabilistic production cost modeling comparable to the ELCC methodology, based on their
5 projected system composition and resource data from a historical test year. That static capacity
6 contribution is then used in the IRP and for purposes of determining avoided cost pricing. Staff
7 recommends that the Joint Utilities forecast a resource’s capacity contribution annually across the
8 planning horizon, but the Joint Utilities are unclear whether Staff’s proposal would identify last-
9 in ELCC values across the planning horizon after accounting for the resource additions forecasted
10 in the IRP or whether the proposal would require no portfolio actions before assigning a capacity
11 contribution across the resource life. In either case, stakeholders recognize that assumptions
12 adopted today are likely to prove inaccurate over long planning horizons such that either
13 interpretation of Staff’s proposal would burden customers with additional risk that could contribute
14 to higher portfolio costs.³³

15 Consistent with Commission policy and practice, utilities acquire capacity to meet near-
16 term needs that are recognized as likely to persist into the future. Utilities use this risk-averse
17 practice of procuring capacity to meet near-term needs as accurate forecasting of capacity
18 contribution in later years of a long-term planning horizon is difficult due to the fact that essential
19 elements of a utility portfolio remain uncertain, such as future load and resource costs, and the
20 ability of utilities to access markets to assist in meeting capacity needs. Utilities are thus cautioned
21 against, and generally avoid, procuring additional capacity to meet far-off needs that have yet to
22 materialize and for which there remains considerable time to allow forecast uncertainties to
23 resolve. In the IRP process and in long-term resource procurement—for instance in an RFP—

³³ See OSSIA Initial Comments at 4-5.

1 these uncertainties are addressed by evaluating portfolios over a range of potential future
2 conditions, and not just an expected case, in order to ensure that the selected outcome does in fact
3 represent the least-cost, least-risk option for customers.

4 Additionally, while parties agree that ELCC values would change as portfolios evolve,³⁴
5 the changes in the utilities’ last few IRP preferred portfolios demonstrate that dramatic changes in
6 portfolio composition can occur over a short time. For example, when considering a utility’s RFP
7 process, utilities cannot even predict whether the outcome will include wind, solar, solar plus
8 storage, or something else entirely. If utilities cannot forecast the outcome of an upcoming
9 procurement, the impracticality of requiring utilities to accurately predict portfolio technology
10 changes across a broader timeframe becomes apparent. A rigidly defined structure for that
11 forecast, such as Staff’s proposed requirement for annual ELCC values, may result in precision

³⁴ While Renewable Northwest is unclear whether its supports or opposes long-term forecasting, it does recognize that ELCC values could change over time due to “variations in load shape, operational characteristics, and resource additions.” Renewable Northwest Initial Comments at 5.

- 1 without accuracy, leading to commitments to capacity payments that do not represent the most
- 2 accurate estimate today, let alone many years in the future.

DATED: April 26, 2021.

McDOWELL RACKNER GIBSON PC



Adam Lowney
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mrg-law.com

Erin Apperson
Portland General Electric Company

Carla Scarsella
PacifiCorp, dba Pacific Power

Donovan Walker
Idaho Power Company

Attorneys for Portland General Electric
Company, PacifiCorp, dba Pacific Power, and
Idaho Power Company