



UM 2225: Investigations into Clean Energy Plans Comments on the Planning Framework Straw Proposals

Caroline Moore, Strategy and Integration Division
Kim Herb, Utility Strategy & Planning Manager
Oregon Public Utility Commission

Thank you for the opportunity to comment on this important docket to investigate strategies and prioritize key issues for near-term implementation relating to Clean Energy Plans, as specified in HB 2021.

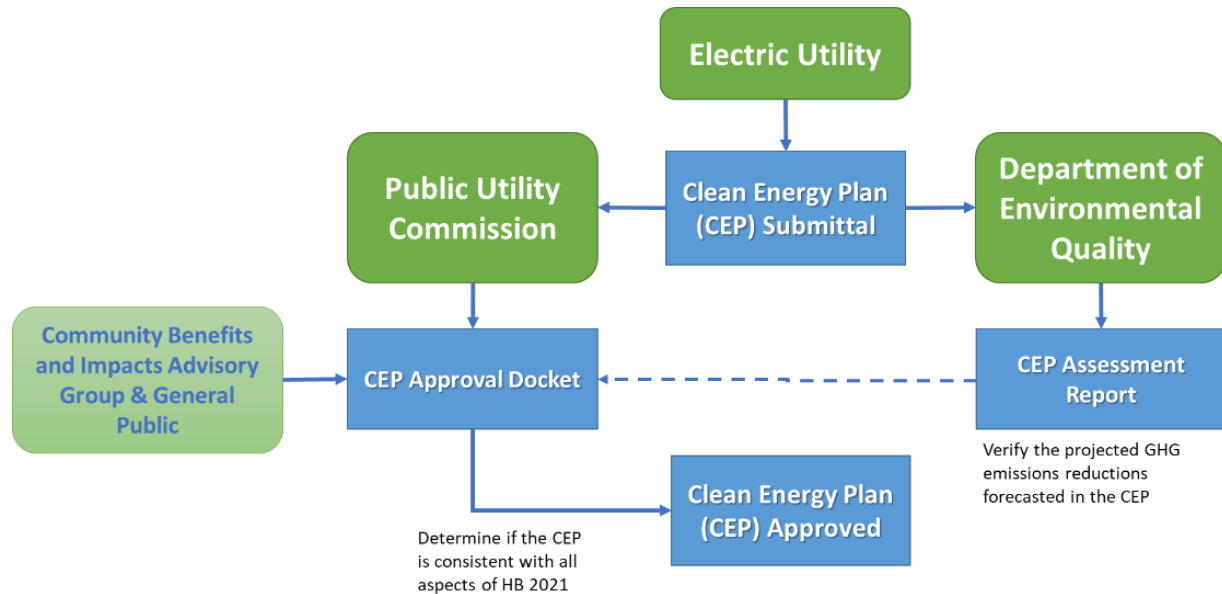
Staff's work plan frames the Planning Framework around the following questions, which I will respond to briefly and then expand on in detail in a proposed Planning Framework.

- *How will the Clean Energy Plan be meaningful?* To be meaningful, the CEP needs to be an independent document with its own approval and updating process.
- *How will the Clean Energy Plan be reviewed if it is filed separately from the IRP?* The HB2021 gives DEQ the responsibility to verify the projected GHG emissions reductions forecasted in the CEP and provide an Assessment report to OPUC.
- *Will the Clean Energy Plan focus on meeting different needs than the IRP?* The CEP is the guiding document that provides the context for IRP and DSP filings, which focus on near-term actions. The analysis used in support of any IRP and DSP findings must be derived from or be consistent with those supporting the CEP.
- *Where will resource actions be vetted and acknowledged?* The answer here depends on what is meant by resource actions. The CEP should establish expectations for relative future clean energy technology types and capacities, but the near-term methods used to acquire those resources need to be spelled out in the IRP/DSP process, with significant input from the Community Benefits and Impacts Advisory Group.
- *What degree of consistency is expected between the IRP, DSP, and Clean Energy Plan for the first filing?* All three documents must be fully consistent.
- *How will information, including stakeholder input, flow between IRP, DSP, and Clean Energy Plans?* Please see the recommendations below, which depict distinct CEP and IRP/DSP review and approval processes
- *How will planning update cycles work in the new planning landscape e.g., IRP Updates?* Please see the recommendations below.

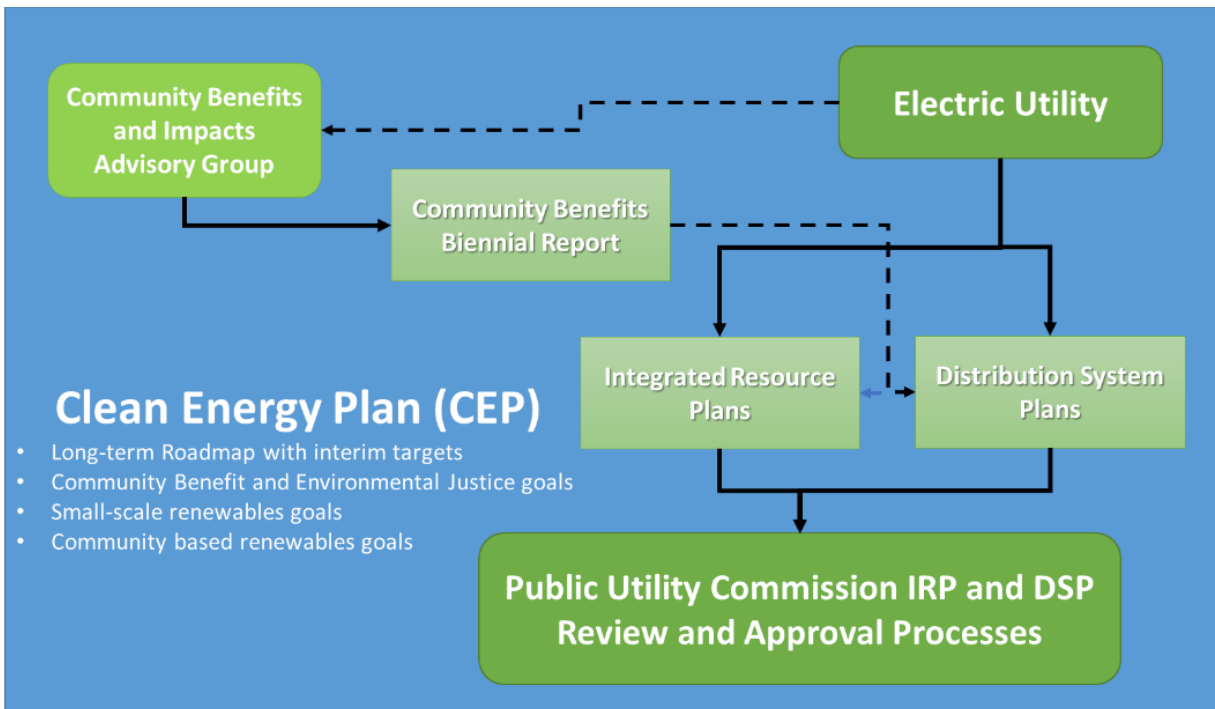
The language in the bill specifies that each electric company operating in Oregon shall submit a Clean Energy Plan (CEP) to the Oregon Public Utility Commission (OPUC) and the Department of Environmental Quality (DEQ). It tasks DEQ with the responsibility to verify the projected GHG emissions reductions forecasted in the CEP and provide an Assessment report to OPUC, which is then tasked with determining if the CEP is consistent with the targets HB 2021.



I strongly urge that the CEP be an independent document with the review and approval process by DEQ, serving as a forum for review and discussion of the technical specifics of the GHG projections and technology choices as depicted in the figure below. The CEP should be the roadmap for each utility, defining what resources they expect to employ to meet the requirements of HB2021. The Community Benefits and Impacts Advisory Group (CBIAG), which is defined in Section 6 of the bill, should have a central role in the development of the CEP.



Once the initial CEP is approved, it should be incorporated into every subsequent Integrated Resource Planning (IRP) and Distribution System Planning (DSP) processes, such that the CEP is an integral component of each IRP and DSP, and demonstrates how the near-term actions proposed in the IRP and DSP are fully consistent and supporting of the longer-range targets in the CEP. Once an initial Community Benefits Biennial Report is developed, it should become an important input to subsequent IRP and DSP filings. As shown in the figure below. The focus of the IRP and DSP should now be deciding what near-term actions are best suited to implementing the near-term parts of the CEP.



Each electric utilities' CEP will need updated periodically, especially as warranted by new information related to resource costs and supplies, the cost, performance and uptake rates for new technologies, and other unpredictable factors. The frequency of updates to the CEP should be driven by these factors and not by the frequency of the IRP and DSP filing cycles.

Thank you, again, for the opportunity to comment on this important docket.

Sincerely,

Dr. Pascal (Pat) DeLaquil
DecisionWare Group LLC
Gresham, OR 97080
Member of the Metro Climate Action Team Steering Committee