



Oregon Citizens' Utility Board

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Public Utility Commission
Attn: Filing Center
P.O. Box 1088
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RE: UM 2225 – CUB's Responses to Planning Framework Straw Proposal

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to provide our response to Staff's straw proposal into how the Oregon Public Utility Commission (PUC) can consider how utilities' Clean Energy Plans (CEPs) should be developed and reviewed given the planning processes involved in utility Integrated Resource Plans (IRPs) and Distribution System Plans (DSPs.) CUB believes it makes the most sense for a utility to develop its CEP through Staff's proposed Path 1, with the CEP filed alongside the IRP, rather than separately as proposed in Path 2.

Section 3 of HB 2021 requires a CEP to be "based on or included in" an IRP. Given the overlap of IRP and HB 2021 requirements, the IRP process is an appropriate niche for CEPs. The IRP process is already evolving to incorporate the elements of a changing energy world. Utilities have been planning for the national departure from new fossil fuel energy generation, including accelerated coal power plant retirements. Federal incentives are largely driving utility investment in renewables, and utility IRPs are already aiming resource acquisition to meet either state and/or utility specific emissions or clean energy goals. Accordingly, utilities are increasingly planning for renewable supply-side and demand-side conservation resources while meeting reliability and resource adequacy requirements in IRPs. The least cost-least risk principle guiding portfolio selection in IRPs direct utilities to procure the most affordable resource mix for its customers.

IRPs are evolving in a manner that reflects HB 2021's requirements for utility CEPs. IRPs are setting clean energy targets and action plans to meet those targets with non-emitting generation resources, energy efficiency measures and acquisition and use of demand response resources. Utility IRPs are also considering climate adaptation studies and risk-based resilience analysis. For example, PacifiCorp's 2021 IRP includes descriptions of the impacts of wildfire and extreme weather on system resources and a risk-based approach to resilience analysis. These must be further refined and will be done in future IRPs. Both IRPs and CEPs share a common general outcome: to plan for an affordable, reliable, and clean energy system.

As PUC Staff correctly identified, the IRP process does not consider the role of community renewables or consider community impacts or benefits. However, these considerations are currently

being addressed in utility DSPs, and the data and findings from the DSPs will be used to inform the utility IRPs. CUB has already provided comments on these issues by responding to the Staff Questionnaire on Community Lens in the CEP.

It makes a lot of sense to incorporate CEP planning directly into the IRP. CUB agrees with Staff that it will simplify the reviewing process. CUB has been in meetings with other stakeholders and many have voiced their concerns regarding the lack of resources to employ in three separate planning processes that are otherwise quite heavily interlinked. Path 1 will simplify the planning process and present an opportunity to elicit feedback on how to make the utility planning processes more accessible, given the highly technical nature of the IRP process and lack of historical stakeholder engagement in those dockets. For example, the PUC could provide additional workshops within the IRP process to help address this equity and accessibility issue.

Finally, utilities are required to file IRP updates within a year of filing the IRP. This practice should continue and, to the extent that the updates impact CEPs, a CEP update should be filed along with the IRP update.

In conclusion CUB emphasizes its support for an efficient and transparent planning process with adequate stakeholder engagement. Rather than separating highly interdependent planning processes like the DSP, IRP, and CEP, utilities should make effort to combine these wherever possible. Stakeholders need to be engaged in the development of all three plans to gain insight into comprehensive utility planning that will shape Oregon's future energy profile and consequently impact millions of utility customers. Existing planning processes need to evolve to accommodate new requirements and policies including energy burden and community benefits issues. CUB looks forward to engaging in future conversations around the development of CEPs by Oregon electric utilities.

Respectfully submitted,

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