



June 10, 2022
Via Electronic Filing

Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, OR 97301-3398

Re: Responses to UM 2225 Roadmap Acknowledgement Questionnaire

The Oregon Solar + Storage Industries Association (OSSIA) appreciates the opportunity to provide the below responses to the Roadmap Acknowledgment Questionnaire as part of Staff's Work Plan in Docket No. UM 2225, the HB 2021 Investigation into Clean Energy Plans. Below OSSIA responded to several of the questions raised by Staff in the questionnaire for Staff's reflection. We address the questions from Staff in the order they appear in the questionnaire.

1. What should be the planning and acknowledgement horizon for the annual goals for action and clean energy targets in the Clean Energy Plan (CEP)?

The planning and acknowledgement horizon for the annual goals for action and clean energy targets in the CEP should be on a similar planning and acknowledgement horizon as the IRP. Currently, the IRP looks at a 20-year horizon. However, the CEP's first annual target is only 8 years away in 2030. OSSIA advises that the CEPs horizon should be based on hitting the annual goals yet also consider the time required to plan for and acquire resources. The current IRP action plan period of two to four years does not address the need for additional transmission lines which can involve a 10+ year planning horizon. Many renewables may need additional transmission to reach our markets in Oregon. As such, while the planning and acknowledgement/approval horizon for CEPs may be more focused on the immediate term and meeting annual goals, it should still consider and evaluate alternatives over the longer term. For example, it may evaluate the costs and benefits of acquiring a wind resource in a distant state and the additional transmission infrastructure needed to bring that resource to Oregon, against the costs and benefits of instead getting power for several net metered or small-scale renewables in state that do not need additional transmission. The Commission should therefore consider acknowledgment or approval of the actions a CEP proposes over the next one to ten years. This roadmap acknowledgement process would be in line with HB 2021's continual progress component. It would allow the utilities to demonstrate their direct actions that move the utility closer to meeting the annual goals.

OSSIA further maintains that the CEP's annual targets should be binding, so the Commission should re-evaluate whether "acknowledgement" or some other term like "approval" is most

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appropriate. HB 2021 presents an ambitious path forward to reduced emissions, but without the utilities being bound by the annual targets there is no guarantee that the utilities will meet these goals. OSSIA does not see HB 2021 as aspirational. In fact, in the legislative process, an earlier amendment to the bill would have directed the utilities to “seek to provide non-emitting electricity” by the targets, but after receiving comments from OSSIA and other organizations, the legislature ultimately adopted the binding language present in the final bill. By making the annual targets binding it ensures that the utilities will pursue every option available to ensure compliance.

2. What details should the annual goals include?

The CEP should contain as much detail about how the utility will meet their annual goals as possible. The details of the CEP should be broken into the categories listed in HB 2021, they should additionally show all actions and investments the utilities are making in each of the categories. The CEP should also contain details regarding reliability, capacity need, and transmission issues. Demand response should be further broken down into load reduction and generation. These categories should detail the emissions they are offsetting accordingly retirements should also be reflected with as much information as possible to show how emissions are being offset. The programmatic actions listed in sub question b, are vital to accelerating Oregon’s GHG emission reductions as well as promoting community benefits, public health, public safety, and reducing burdens on environmental justice communities. The CEP should contain analysis addressing how utility actions are working to minimize burdens on environmental justice communities. Another category that should be included is a separate breakdown of the utilities and customer acquisition of storage resources.

Utilities are already reflecting the importance of storage resources in their IRPs and RFPs. For Oregon to reach their annual goals, storage resources are going to be key. These storage resources will enable increased infiltration of renewable resources, microgrids and distributed energy resources. Accordingly, Storage resources should be included in their own category in the CEP. These storage resources should be separated in categories of resource type and display MW for these resources. These categories should include a breakdown of resource type for example: lithium, pumped storage, iron flow, etc.

Additionally, annual procurement goals should differentiate between system resources and customer supported renewables by delineating which category they belong to and the number of MW in each. All these actions should be detailed to the greatest extent possible, increased transparency on these details enables stakeholders and community-based organizations to better advocate and interact with the utilities and the Public Utility Commission. We have previously



requested full transparency in the IRP, and we would extend that request to CEPs and the data utilities use to create them. CEPs should be fully transparent as it would allow stakeholders to fully engage in all aspects of the process.

3. How should compliance and continual progress be demonstrated and assessed?

Compliance and continual progress should be demonstrated through the action items in the CEP making progress towards meeting the annual goal targets. All actions and investments in the CEP should be accompanied by a projected emissions reduction. If these projected emission reductions cannot be verified by DEQ, then it must be considered by the Public Utility Commission CEP acknowledgment decision. OSSIA supports an opportunity for a utility to remedy their projected emission reductions because we recognize the importance of these annual goals in reducing human effects on climate change. However, the opportunity to remedy should be limited to a short period of time for the utility to either file additional information with DEQ to verify the emission reductions or to find another means of reducing emissions. A CEP must show that a utility is actively reducing emissions to meet the annual goals, each year that we get closer to 2030, then 2035, and 2040 will show how close each electric utility is to meeting their target. The biggest factor that will influence continual progress is that each year will also show the feasibility of meeting these goals, it also highlights the importance of utilities pursuing every opportunity to reduce emissions. If a utility is not on track to meet the 2030 target, it throws the entire timeline in jeopardy.

Accordingly, Commission approval of the CEP and annual goals is essential. Whether it means non acknowledgment because a plan will not meet the goals or using acknowledgment/non-acknowledgment to point out potential hurdles to utility plans. There are extensive hurdles to meeting these goals, especially considering the congested transmission system and difficulties building new transmission. Accordingly, the Commission must use approval of CEPs to consider the extent that the utility actions and investments have been properly engaged with the community and that the benefits brought to communities through community resilience are meaningful beyond a purely cost-effective analysis. The first annual target rapidly approaching, it is essential that the CEP effectively demonstrate the explicit actions the utility is taking to ensure that each of the annual targets will be reached. Additionally, the CEP should be heavily scrutinized. If the plan does not reflect extensive progress towards meeting the annual goals, then the CEP or components of the CEP should not be approved.

4. How do you envision Commission acknowledgement of the Clean Energy Plan/annual goals for actions?



Commission acknowledgement of the CEP should be different than acknowledgment in the IRP, it must go beyond appearing reasonable at the time. After the utility submits their CEP, the Commission should review the proposed actions and investments to determine whether they are reasonable and will sufficiently reduce the utilities emissions to meet the annual goals. Acknowledgment of the CEP should show that the plan is responsive to community benefits and goes beyond least cost least risk. The Commission should pay special attention to community benefits of the CEP that benefit marginalized and otherwise vulnerable groups. Acknowledgement of the CEP should go down to the action level, if the actions are all worthy of acknowledgement, then acknowledgement of the CEP generally would be acceptable. Additionally, the Commission should review the CEPs to determine whether the action items the utility is pursuing are technically feasible, if there are transmission constraints that will likely prevent a project then it may not be technically feasible. If an action is not technically feasible when being considered for acknowledgment, then it should not be acknowledged at that time. When the Commission assess reliability and resilience, OSSIA feels it is important for the Commission to consider community resilience as it was defined in the Energy Advocates response to the community lens questionnaire. Resilience breaks down into three components: prevention, recovery, and survivability. While utilities have previously focused on prevention and recovery, community resilience will require the utilities pursue survivability. Survivability means that customers should be equipped with the technology and the ability to maintain some basic level of electrical functionality to survive a disruptive event. The CEPs should be assessed to determine how they are contributing to resilience so that all three areas receive warranted attention, especially survivability which has not been historically considered by utilities.

Affordability and economic feasibility should play a different role than they have in the past. The purely cost-effective analysis is not enough, as other factors are considered the weight of affordability must be reduced. Environmental and health benefits are wide ranging and include: the reduction of GHG emissions, reduced pollution burden and pollution exposure, increased neighborhood safety, improved public health, and reduced health care cost burden. These benefits are difficult to value in the traditional least cost model, however they present real opportunities to benefit the community. Weighing factors such as the environmental factor and community benefits provide the Commission with an opportunity to ensure these projects are addressing community issues and providing benefits to Oregonians. Community benefits include community economic development, increased access to energy efficiency, low income access to distributed energy resources, health and community well-being, reduced burden to environmental justice communities, energy security, etc. Utilities should consult with communities within their service territory to better gauge the community benefits and community resilience projects. They are not easy to place a value on, but they must be considered in the CEP acknowledgment decision.



While the Commission has not recognized a requirement that some HB 2021 resources must be built in Oregon, OSSIA argues that for the community to receive benefits and increase community resilience there must be an additional factor favoring development of some resources in Oregon. Community impact and benefit are important components in HB 2021, Section 2. Communities will receive benefits that have not traditionally been examined through the IRP Guidelines, direct and indirect economic benefits from project development and reducing emissions must be considered in the CEPs. Additionally, the Commission should consider additional factors such as community employment opportunities and other non-energy benefits that benefit the community.

OSSIA looks forward to working with the Commission, Staff, and stakeholders to ensure that the CEP is carried out with the fullest benefit to Oregon's communities while maximizing carbon reduction.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Watson", is written over a faint, light-colored signature line.

Jack Watson

Director of Policy and Regulatory Affairs