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Subject: Comments on Analytical Improvements
Date: Wednesday, October 5, 2022 4:07:21 PM

Comments submitted by Kathy Moyd for the “Staff’s Straw Proposals on Analytical Improvements”

General Comments

• The final structure of the document giving guidance to the utilities for writing their CEPs is not clear. The presentation for the Staff Proposals for Analytical Improvements is broken into numbered Chapters with numbered topics in each chapter, while that for the Roadmap Acknowledgment is just the numbered Topics. It is also not obvious to me that Roadmap Acknowledgment, Community Benefit, Resiliency, and Analytical Improvements can be developed independently of each other.

• Data standardization and accessibility should not be buried in the last Topic, but should be introduced at the beginning to be carried through the entire CEP.

• I am having trouble separating directions to the utilities to do addition analyses within their IRPs from those directions that are strictly within the CEP. For example there are directives to do things within the “Action Plan” which I interpret to mean in the Action Plan to be acknowledged as part of the IRP. At the October 4 public meeting I agreed with Topic 5 of the Roadmap Acknowledgment requiring IRPs to take into account reductions in greenhouse gas emissions and any related environmental or health benefits in addition to the low-cost and low-risk in the current IRP Guidelines.

• The deadline for meeting the 80% reduction by 2030 is less than eight years away, so even the 2023 IRPs and associated CEPs must have sufficient specific information to show how the utilities expect to meet that target. Just running a number of newly defined scenarios will not be sufficient. In addition, scenarios with a specific purpose can be significantly affected by the unspecified choices made for other parameters. It may help to have one or more stochastic/Monte Carlo simulations done with probability ranges for a number of uncertain parameters.

• Skipping over Topics means I don’t have comments on those topics or have included them in my General Comments.

Chapter 1: Planning for Decarbonization Targets

Topic 1: Clean Technology Scenarios

• Clean hydrogen: The PUC should specify that “clean hydrogen” is “hydrogen produced by electrolysis that is powered by renewable electricity.”

<!--[if !supportLists]-->• <!--[endif]-->Long Duration Storage: This should be considered a necessary part of anything involved with, at minimum, intermittent generation and resiliency.

<!--[if !supportLists]-->• <!--[endif]-->Offshore wind: The amount should be specified. This could be included as a “yes/no” or a probability ranging from zero to the 3 GW specified by SB 3375 (2021) in the stochastic simulation(s).

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Topic 2: Demand Scenarios

<!--[if !supportLists]-->• <!--[endif]-->Electrification and climate change/extreme weather are not independent. Residential and commercial electrification will likely include the use of electric heat pumps provide heating as well as the cooling already being done using electricity. So weather impacts in all seasons must be taken into account for electricity usage.

Topic 3: Regional Development Scenarios

<!--[if !supportLists]-->• <!--[endif]-->It doesn’t make sense to have three separate scenarios with a number of other, unspecified parameters. It would be better to ask the utilities to discuss the pros and cons of different forms of regional development including the three included and a Regional Transmission Organization.

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Topic 4: GHG Emissions Constraints in IRP Modeling

<!--[if !supportLists]-->• <!--[endif]-->I agree that “typical or expected weather and hydro conditions” should be taken into account.

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Chapter 2: Treatment of Fossil Fuel Resources

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Topic 2: Fossil Fuel Resource Operational Changes

<!--[if !supportLists]-->• <!--[endif]-->The second item is definitely required since neither HB 2021, nor the Climate Protection Program regulates the emissions created by the generation in Oregon of electricity sent out of state.

Kathy Moyd