



April 26, 2022

Via Electronic Filing

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

**Re: Comments on Community Lens Questionnaire
OPUC Docket UM 2225**

Renewable Northwest appreciates the opportunity to provide the below comments on the Community Lens Questionnaire as part of Staff’s Work Plan under docket UM 2225, investigating Clean Energy Plans (“CEP”) to implement HB 2021 (2021). Below Renewable Northwest addresses some of the questions posed by Staff in the questionnaire for Staff’s consideration. We address the questions posed by Staff in the order in which they were presented in the questionnaire.

In addition to the below responses, RNW also suggests the following studies from the Lawrence Berkeley National Laboratory as potential resources:

[A Hybrid Approach to Estimating the Economic Value of Enhanced Power System Resilience](#), February 2021

[Behind the Meter Solar+Storage: Market data and trends](#), July 2021

Question 1: How do you envision the Risk-based resiliency analysis, based on Commission adopted standards?

HB 2021 §4(4)(c) requires the Clean Energy Plan to “Include a risk-based examination of resiliency opportunities that includes costs, consequences, outcomes and benefits based on reasonable and prudent industry resiliency standards and guidelines established by the Public Utility Commission[.]”

(a) How should resiliency opportunities be defined?

In implementing this subsection of HB 2021, the PUC is charged with establishing “reasonable and prudent industry resiliency standards and guidelines.” In considering establishing a

definition, RNW suggests that a definition that is both sufficiently flexible but also measurable would be appropriate.

Starting at the most general, resiliency could mean the reliable provision of electricity regardless of adverse conditions. More specific definitions or conditions could reflect individual communities and what issues are most prominent there, whether it is extreme weather events creating unexpected demand or natural disasters which can disrupt service through infrastructure destruction, such as wildfires, floods, or seismic activity. These risks impact generation resources, placing power reliability in peril for communities.

If the CEP includes a risk-based examination for resiliency, the consideration of system hardening is a reasonable inclusion as a means to prevent power delivery interruptions in addition to considering generation resources. System hardening could appear as part of a plan to increase or ensure firm delivery, and complementary to resource diversification.

Resiliency opportunities could be utility actions, but not all resiliency opportunities need to be actions as contemplated by the language of HB 2021. For resiliency opportunities to be actions under HB 2021, they must help “make progress towards meeting the clean energy targets set forth in” HB 2021..

(b) What is the format and use of the analysis; what is meant by risk-based examination?

As noted above, information from this analysis could be used to identify procurement-related actions, but it need not always be tied to procurement. For example, Staff asked if this analysis could be used to support policy discussions on the resiliency value of resources and configurations, which we see as a reasonable and appropriate use of the study in question. As would the use of the study as a means to identify areas of heightened threats within the utility system or service area to inform programs and policies be appropriate.

Whether resiliency opportunities are incorporated into portfolio modeling or resiliency values are included in scoring criteria should be determined once stakeholders have had the chance to approach consensus on resiliency value. At that point, it is possible that resiliency value could be reflected in scoring criteria.

RNW sees this study as potentially informing and influencing utility investments as a preferred outcome, although there is flexibility in the statute. This early in the process, the Commission need not silo the study as “informational only” nor decide up front that the study must inform resource decisions.

(c) How are costs to be included?

At this point, it is difficult to discuss costs without having a clearer picture of resiliency value as it is understood by the Commission, Staff, and stakeholders. RNW looks forward to other stakeholder comments and further discussion on this topic.

(e) This information should be presented in the CEP, but where is the analysis performed and incorporated into the utility resource strategy?

Depending on the consensus definition of resiliency value, it may be appropriate for resiliency information to be included in any or all of the IRP, DSP, and CEP. This reflects that resiliency is a broad value that could apply at both the utility scale and the distribution scale.

Question 2: How do you envision offsetting fossil fuel generation with community-based renewable energy (CBRE) generation analysis?

HB 2021 §4(4)(d) requires the Clean Energy Plan to, “Examine the costs and opportunities of offsetting energy generated from fossil fuels with community-based renewable energy[.]”

(a) How should opportunities be defined?

In this case, opportunities seem focused on achieving HB 2021 goals and reduced dispatch or accelerated retirement of fossil fuel energy generation facilities. Studying resiliency and accounting for feedback from the Utility Community Benefits and Impacts Advisory Group may well identify additional values that CBREs bring to a utility’s system and customers, which in turn could also support more movement from fossil generation facilities to non-emitting renewables. The Commission is already familiar with efforts to compare the cost of building new renewable resources against the marginal cost of fossil generation and should draw on this experience to help define this process and serve as a “starting point” for incorporating additional values associated with CBREs. This addition of CBRE values to the existing cost comparison analysis of new renewable resources against fossil generation costs could help identify opportunities to supply energy from CBREs that lead to reduced dispatch or early retirement of fossil units and that might not have seemed attractive or feasible based on previous or traditional economic analysis.

(b) What is the format and use of the analysis; what is meant by examine?

It seems that the answer depends on whether or not additional values of CBREs (such as resiliency values) are identified. If yes, CBREs could either be incorporated into portfolio modeling, perhaps as a sensitivity that includes a credit applied to proxy CBRE resources that reflects these additional values. That sensitivity could inform a target level of CBRE procurement. We are not suggesting this is the only way or even the right way to study CBREs, but rather offer this approach as a preliminary possibility to consider.

Question 3: How do you envision incorporating community benefits into planning?

HB 2021 §5(2)(a) requires the Commission to consider in acknowledgement, “(a) Any reduction of greenhouse gas emissions that is expected through the plan, and any related environmental or health benefits...(e) Costs and risks to the customers; and (f) Any other relevant factors as determined by the commission.”

In general, we are supportive of and encourage the Commission to work toward stakeholder consensus on how to define resiliency and identify its benefits. How to incorporate these benefits into the CEP analysis will depend on getting a definition in place. We defer to communities on which community benefits should be included and how they might be used in planning analysis in the CEP.

We suggest that the Commission keep open the question of which relevant factors should be evaluated when determining if a plan is in the public interest for the duration of HB 2021 implementation to allow for new factors to emerge in the process. The work streams identified by Commission Staff may reveal important factors.

Thank you for your consideration of these comments. We look forward to continued engagement in this process.

Respectfully submitted this 26th day of April, 2022,

/s/ Diane Brandt

Oregon Policy Manager
Renewable Northwest
421 SW Sixth Ave. #1400
Portland, OR 97204
(503) 223-4544

/s/ Max Greene

Regulatory & Policy Director
Renewable Northwest
421 SW Sixth Ave. #1400
Portland, OR 97204
(503) 223-4544