



Portland General Electric
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June 7, 2024

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: LC 80 - Portland General Electric Company's 2023 Clean Energy Plan and Integrated Resource Plan; Request For Information Proposal

Dear Filing Center:

Portland General Electric (PGE) appreciates the opportunity to provide an update on our efforts to advance the Request for Information (RFI) contemplated by PGE and stakeholder comments in LC 80 and directed by the Public Utility Commission of Oregon (OPUC) by Order No. 24-096. In this filing, PGE provides an update on the scope and timing of our forthcoming RFI and offers an opportunity for stakeholders to review and provide feedback prior to launch.

Context

PGE's filing is for a 2024 Long Lead-Time (projects with a commercial online date after 2029) RFI proposal consistent with Order 24-096, wherein the Commission ordered that:

PGE file a proposal to develop a long lead-time resource RFI via a stakeholder process in LC 80, facilitate a workshop on the RFI findings, and allow sufficient time for stakeholder review of its RFI before proposing its next steps.

OPUC's acknowledgement condition ties back to PGE's discussion of an RFI in the context of the 2023 RFP process. PGE initially described the RFI in LC 80 as a key tool to understand actions to enable future procurement, such as alleviation of transmission congestion or additional rights, writing that "we will use responses to that RFI to identify which enabling actions may best position PGE for future acquisition of generating resources."¹ We elaborated in subsequent comments that the "RFI will seek to identify resources that could

¹ LC 80, PGE 2023 CEP/IRP, PGE Round 0 Comments, 31 May 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAC/lc80hac102443.pdf>

come online later this decade and in the 2030s and will use responses to prepare for future acquisition cycles (both from a market signal perspective and in terms of preparing the grid for new technologies and locations).”² We continue to look for projects which will deliver least cost, least risk outcomes for customers.

We are grateful for engagement on this topic from Staff and stakeholders in LC 80, and our proposed approach and process seeks to reflect feedback provided through that dialogue.

RFI Approach

Given the requirements of HB 2021, demand growth, and the reality of regional transmission constraints, it is incredibly important to have visibility into actions required today to ensure we can achieve HB 2021 goals and meet customer demand. PGE’s RFI is focused on three objectives, which support these actions:

1) Build market intelligence

The proposed RFI is to gather market data on where future renewable energy and capacity projects will be sited. The RFI will also collect the project’s associated transmission arrangements. The RFI is both location- and technology-agnostic. It is focused on a planning horizon for projects coming online after 2029 and that are 50 MW or larger.

2) Support better understanding of how to prepare the grid for future resource additions

The results of the RFI will better inform transmission strategy discussions and the stakeholder process around technologies and geographies to be included in future IRP analysis.

3) Increase understanding of key development criteria for long lead-time resource additions

The results will inform how long lead-time resources are contemplated in future IRPs, appropriate commercial structures required for development to initiate, and the role required of utilities such as PGE for projects to move forward. The RFI looks to bridge the information gap between PGE and potential longer-term renewable development in the region.

The RFI will consist of an intake form, see Exhibit A, with no scoring evaluation. The intent is an intuitive form that encourages developer participation and provides meaningful information for future IRPs and RFPs.

² LC 80, PGE 2023 CEP/IRP, PGE Round 1 Comments, 7 September 2023, available at: <https://edocs.puc.state.or.us/efdocs/HAC/lc80hac131341.pdf>

Timing and Process

PGE welcomes comments and feedback from the stakeholder community over the next two weeks regarding what additional information we should be seeking, whether there are any preferred paths to distribute the RFI, or any other guidance on the process. PGE requests any formal feedback be submitted as filed comments to the LC 80 docket by Friday June 21. Following receipt of feedback, PGE will consider revisions to the RFI in development of final materials and processes.

PGE will socialize the RFI with developers and industry trade groups, and through the RFP and IRP docket distribution lists. PGE proposes the 2024 RFI go to market for six weeks, tentatively June 28 - August 9, 2024. Details will be provided in public RFI materials.

The RFI findings will be shared via a PGE-led and facilitated workshop later this year. Similar to procedures for RFPs, PGE will maintain confidentiality for all commercially sensitive information submitted through the RFI.

We look forward to any feedback on this process.

Sincerely,

/s/ Riley Peck

Riley Peck
Senior Manager, Regulatory Strategy
Resource & Regulatory Strategy

Exhibit A: 2024 RFI Intake Form

General Project Information

1. Company Name
2. Project Name
3. Project Location (City)
4. Project Location (State)
5. Resource Type (select all that would apply)
 - Onshore Wind
 - Offshore Wind
 - Solar
 - Lithium-ion Battery Storage
 - Pumped Hydro
 - Green Hydrogen
 - Other (describe)
6. Anticipated Commercial Operations Date
7. Maximum Anticipated Nameplate Generation Capacity (MW or kg)
8. Forecasted Annual Capacity Factor
9. Maximum Anticipated Storage Capacity (MW) if applicable
10. Anticipated Storage Duration (hours) if applicable
11. Provide executive summary of the project or additional commentary (if available)

Permitting + Site Control

12. Which permitting agency authority is required for this project (select all that would apply)?
 - State
 - County
 - City
 - Federal
 - Other (describe)
13. What is the project's permitting status?
 - Not started
 - Initiated
 - Completed
 - Other (describe)
14. Is a FERC license required?
 - Yes
 - No
15. If yes, has an application been submitted?
16. If no, when is the expected application date?
17. Does the project have a Federal nexus (i.e., Federal money is used, includes federal land, or a federal permit or approval is required)?

18. Have you secured site control for the Project?

No

Majority Secured

Fully Secured

Other (describe)

Interconnection Plan

19. Interconnection provider

20. Point of Interconnection

21. Have you submitted an interconnection service request? (Branch below)

Yes

No

22. Interconnection Queue Number

23. Interconnection Study Status (ex. System Impact Study Tendered, included in '25 Cluster Study)

Transmission Plan

24. Will the project be delivered to PGE or at busbar (point of interconnection)?

PGE

Busbar

If delivered to PGE-→

25. How many transmission provider wheels do you require to deliver to PGE?

0 (PGE Network)

1

2

Other (describe)

26. Transmission provider(s)

27. Have you submitted all relevant Transmission Service Requests for delivery to PGE?

Yes

No

28. Type of product requested

Long-Term Firm

Conditional Firm

Other (describe)

29. Transmission Service Request Number(s)?

30. Transmission Service Request Study Status (ex. '25 Cluster Study, Preliminary Engineering Agreement)?

31. Please explain the transmission pathway strategy from the project to PGE.