



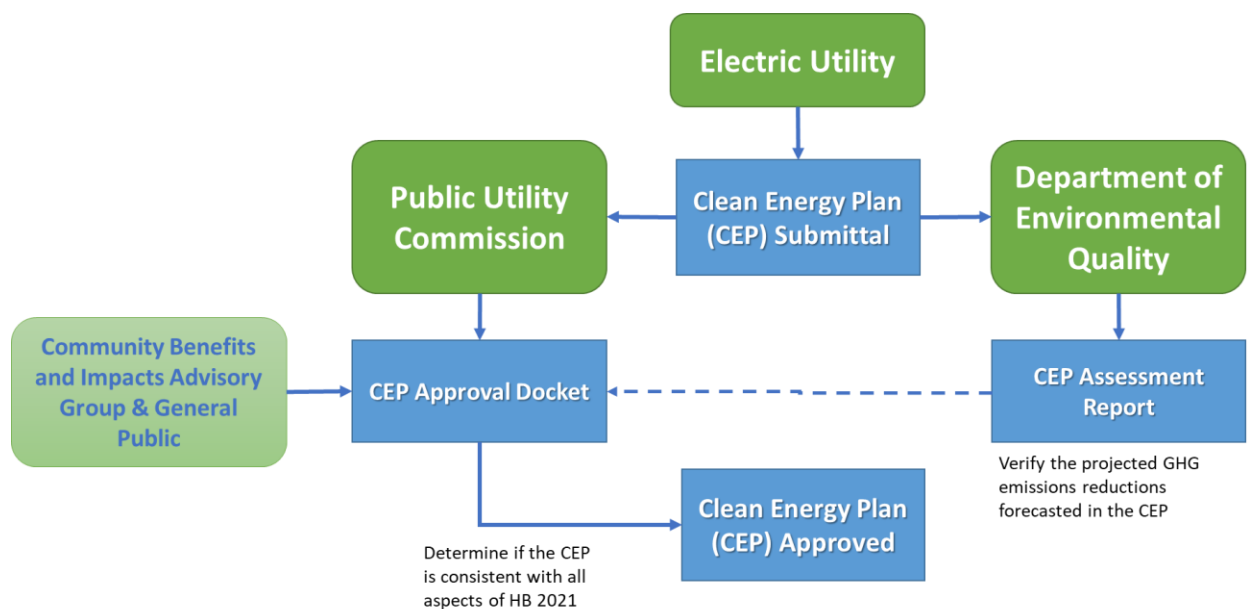
HB 2021 Implementation Strategy: UM 2225 Additional Comments on Workshop 1 – Integration and Roadmap

Caroline Moore, Strategy and Integration Division
Kim Herb, Utility Strategy & Planning Manager
Oregon Public Utility Commission

Thank you for the opportunity to comment on this important docket to investigate strategies and prioritize key issues for near-term implementation relating to Clean Energy Plans, as specified in HB 2021.

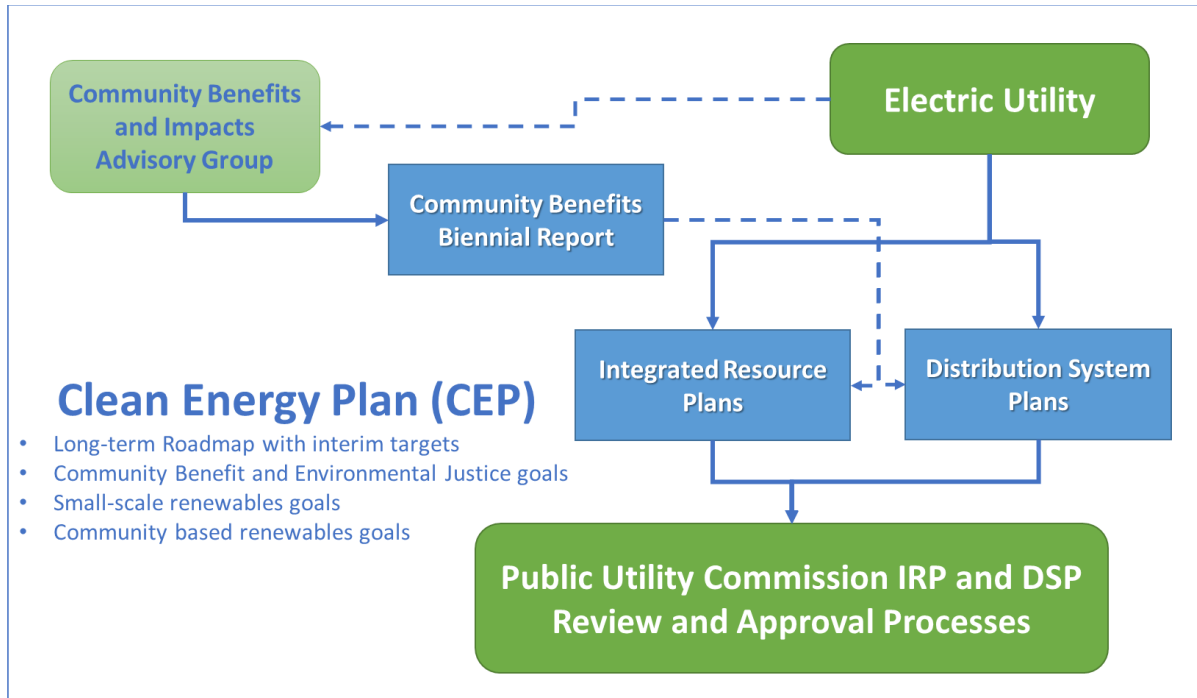
The language in the bill specifies that each electric company operating in Oregon shall submit a Clean Energy Plan (CEP) to the Oregon Public Utility Commission (OPUC) and the Department of Environmental Quality (DEQ). It tasks DEQ with the responsibility to verify the projected GHG emissions reductions forecasted in the CEP and provide a report to OPUC, which is then tasked with determining if the CEP is consistent with the targets HB 2021. The bill further specifies that the CEP must be based on or included in an integrated resource plan filing made no earlier than January 1, 2022, and filed no later than 180 days after the integrated resource plan is filed, or developed within an integrated resource planning process and incorporated into the integrated resource plan filed with the commission.

I participated in the Integration breakout group, and based on the discussion there, I strongly urge that the CEP be an independent document with its own approval and updating process, as depicted in the figure below. Note that the Community Benefits and Impacts Advisory Group (CBIAG), which is defined in Section 6 of the bill, should have a central role in review of the initial CEP, especially as this CEP may precede the first Community Benefits Biennial Report.





Once the initial CEP is approved, it should be incorporated into every subsequent Integrated Resource Planning (IRP) and Distribution System Planning (DSP) processes, such that the CEP is an integral component of each IRP and DSP, and demonstrates how the near-term actions proposed in the IRP and DSP are fully consistent and supporting of the longer-range targets in the CEP. Once an initial Community Benefits Biennial Report is developed, it should become an important input to subsequent IRP and DSP filings. As shown in the figure below.



Each electric utilities' CEP will need updated periodically, especially as warranted by new information related to resource costs and supplies, the cost, performance and uptake rates for new technologies, and other unpredictable factors. The frequency of updates to the CEP should be driven by these factors and not by the frequency of the IRP and DSP filing cycles.

Thank you, again, for the opportunity to comment on this important docket.

Sincerely,

Dr. Pat DeLaquil
DecisionWare Group LLC
Gresham, OR 97080