

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of
PORTLAND GENERAL ELECTRIC
COMPANY,
2019 Integrated Resource Plan.

MEMORANDUM

On December 4, 2019, the Administrative Hearings Division (AHD) held a workshop regarding OAR Division 089 rules for Resource Procurement for Electric Companies. At the workshop, AHD gathered feedback from stakeholders regarding the application of the rules to current Integrated Resource Plan (IRP) dockets and forthcoming dockets for selection of an Independent Evaluator (IE) and approval of a Request for Proposal (RFP). AHD and stakeholders identified rule provisions that may need Commission explanation, and reviewed avenues for Commission resolution of questions.

The consensus view among stakeholders was that the Commission should address any practical issues associated with application of these rules, as those issues are raised in active dockets. At this time, the utilities' IRP proceedings are active dockets. Accordingly, we are issuing a memorandum in this docket asking stakeholders to offer comment, provide argument, and recommend resolution of any competitive bidding rule issues that are presented in the IRP filing.

In Portland General Electric Company's IRP proceeding, many of stakeholders' opening comments in October and PGE's reply comments in November, contain arguments regarding the interpretation and application of the competitive bidding rules. We request that stakeholders and PGE continue to address (even briefly) the following issues in the final two rounds of comments:

1. Regarding a RFP for RPS-eligible resources:
 - a. Do PGE's IRP filings contain RFP design, scoring methodology, and associated modeling process as described in OAR 860-089-0250(2)(a) such that further RFP design information may be filed in the RFP approval docket?
 - b. Please explain if specific RFP design items should be re-stated or further explained in PGE's IE selection docket, such as non-price criteria.
2. Regarding regulatory barriers for long-lead time resources:
 - a. Does the Commission need to address a long-lead time resource within this IRP proceeding?
 - b. Is it important whether the Commission acknowledges a resource need, or a specific resource type, in this IRP proceeding?
 - c. If the Commission does not address a long-lead time resource within this IRP, how could or would PGE pursue such a resource?

- i. Would a long-lead time resource be able to participate in a future capacity procurement?
- ii. Are there bridging strategies available to PGE?

Dated this 11th day of December, 2019, at Salem, Oregon.



Sarah Rowe
Administrative Law Judge



Christopher J. Allwein
Administrative Law Judge