McDOWELL RACKNER GIBSON PC
419 SW 11th Ave, Suite 400 | Portland, OR 97205

ADAM LOWNEY
Direct (503) 595-3926
adam@mrg-law.com

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Re: *In the Matter of Public Utility Commission of Oregon General Capacity Investigation*, Docket No. UM 2011 – Joint Utilities' Updated Proposal

In accordance with the agreement reached at the December 6, 2021, workshop, Portland General Electric Company (PGE), PacifiCorp d/b/a Pacific Power (PacifiCorp), and Idaho Power Company (Idaho Power) (together, the Joint Utilities) present the following updated proposal for providing capacity contribution results.

The Joint Utilities have agreed to provide the following[1]:

- Loss of Load Probability (LOLP) based on its most recent IRP beginning in 2024 and for every four years thereafter until 2040. Each utility will provide two LOLP results for each year—one based on modeling that includes the incremental resource additions included in each utility's IRP preferred portfolio and one that reflects the resource assumptions in paragraph 3(f) and (g) of Staff's proposed Best Practices (i.e., the LOLP results will reflect resource retirements and no uncommitted incremental resource additions).
- Each utility will provide a reliability-based analysis comparable to Effective Load Carrying Capacity (ELCC) results for a wind resource and a solar resource for 2024.[2] The ELCC results will be based on resource characteristics used in each utility's most recent IRP.

[1] Unless specifically stated, the details described in the Joint Utilities' November 23, 2021, proposal will continue to apply to this updated proposal.

[2] Because of the complexity of its loads and transmission system, PacifiCorp intends to employ the equivalent conventional power (ECP) methodology instead of ELCC for all of these requests. ECP is comparable to ELCC, except that instead of modifying forecasted load, equivalent reliability is achieved by adding or removing a conventional resource. PacifiCorp proposes replacing the specified renewable resources with sufficient proxy non-emitting peaking resources to maintain reliability. This methodology was used in PacifiCorp's 2019 IRP (see Appendix N). For more details see: Madaeni, S. H.; Sioshansi, R.; and Denholm, P. "Comparison of Capacity Value Methods for Photovoltaics in the Western United States." NREL/TP-6A20-54704, Denver, CO: National Renewable Energy Laboratory, July 2012 (NREL Report) at: www.nrel.gov/docs/fy12osti/54704.pdf

- Each utility will provide ELCC results for a solar resource in 2032, based on resource characteristics used in each utility's most recent IRP.
- Each utility will provide ELCC results for a solar resource in 2040, based on resource characteristics used in each utility's most recent IRP.
- Each utility will provide the base case inputs used for the LOLP and ELCC studies, subject to appropriate protections for confidential information. In particular, each utility will provide a generation profile for the proxy resource (i.e., the new wind or solar resource) and the generation profiles for existing resources, subject to appropriate protections for confidential information.
- The Joint Utilities will provide a step-by-step explanation of how to determine a resource's capacity contribution based on the LOLP results.

The Joint Utilities appreciate stakeholders' continued engagement in this docket and look forward to discussing the results of the above-referenced studies at the January workshop.

Respectfully submitted,

Adam Lowney
Jordan Schoonover
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mrg-law.com

Donald Light
Portland General Electric Company

Carla Scarsella
PacifiCorp, dba Pacific Power

Donovan Walker
Idaho Power Company
Attorneys for Portland General Electric Company, PacifiCorp, dba Pacific Power, and Idaho Power Company