



**Portland General Electric Company**  
Legal Department  
121 SW Salmon Street • 1WTC1301 • Portland, Oregon 97204  
Telephone 503-464-8544 • Facsimile 503-464-2200  
portlandgeneral.com

**Erin E. Apperson**  
Assistant General Counsel

December 11, 2019

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

Re: LC 73 – Portland General Electric Company’s 2019 Integrated Resource Plan (IRP)

Dear Filing Center:

Enclosed for filing today in the above-referenced docket is Portland General Electric Company’s (“PGE”) Errata to the Updated Needs Assessment filed November 27, 2019.

Upon further review of PGE’s Needs Update Addendum, PGE discovered the following:

- Figure 3 on page 5: Incorrect labels were added to the figure for the capacity need impacts from the resource and load updates.
- Table 5 on page 10: The table values were not correctly updated to reflect the PURPA QF sensitivity.

Corrected versions of Figure 3 and Table 5 are attached in both redline and clean format. These corrections do not impact the analysis and conclusions from PGE’s Updated Needs Assessment.

Please direct any questions regarding this filing to Kate von Reis Baron at [kate.von.reis.baron@pgn.com](mailto:kate.von.reis.baron@pgn.com) or (503) 464-7042.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Apperson", with a long horizontal flourish extending to the right.

Erin E. Apperson  
Assistant General Counsel

EEA:al

In the Reference Case in the year 2025, capacity need increased from 685 MW to 697 MW. Figure 3 shows the relative impacts from the resource updates and the load forecast update.

**Figure 3: Capacity impacts of resource and load updates**

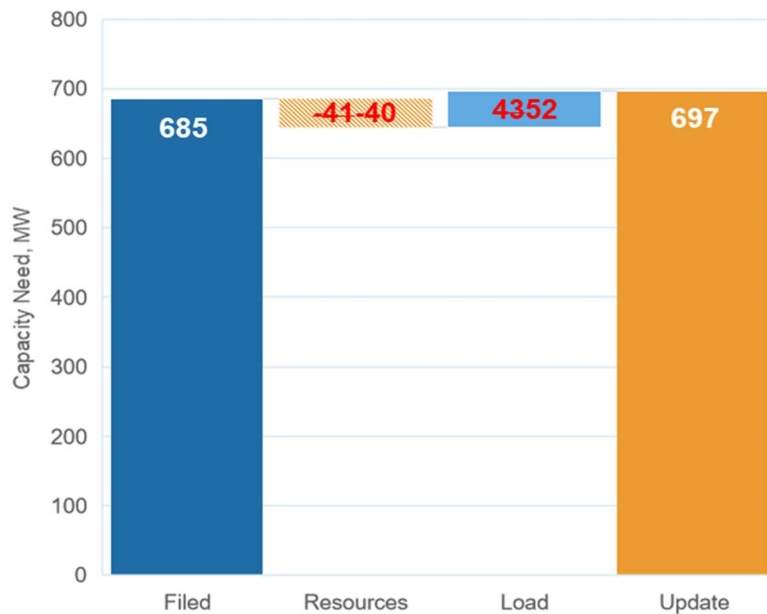
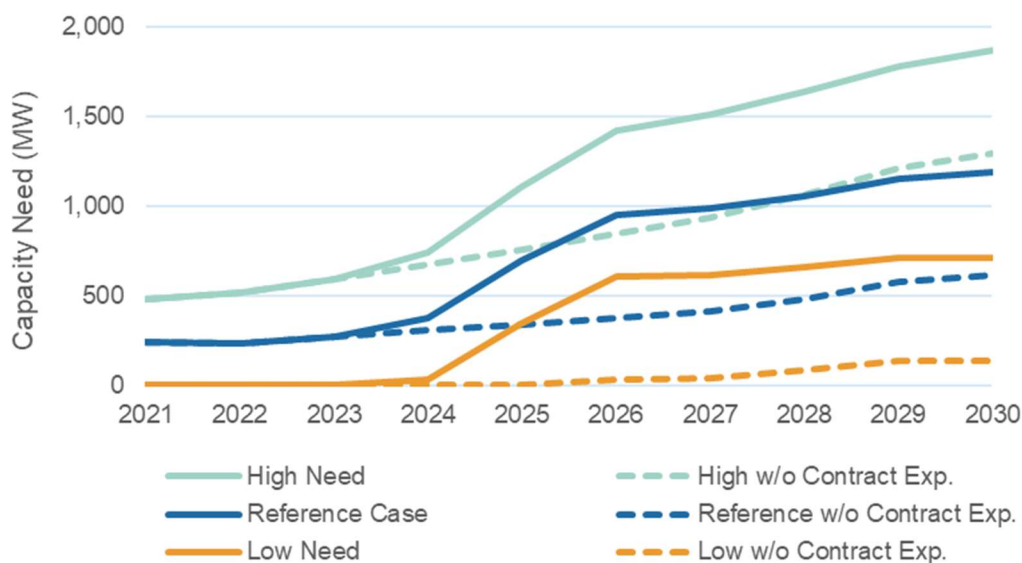


Figure 4 shows the updated capacity need in the Low, Reference, and High Need Futures. It also shows the need if the contracts expiring through the end of 2025 are assumed to be renewed or replaced with other existing resources of equal size. Note that as discussed in Section 1, the Low and High Need Futures reflect updated resource information and do not have updated load forecasts. This updated analysis continues to identify that PGE has significant forecasted capacity needs in the Reference Case with a large range of uncertainty in the mid-2020s, and that contract expirations drive a substantive portion of that need. This update does not necessitate a change to PGE’s staged capacity action in the Action Plan.

**Figure 4: Capacity need across Need Futures and impact of contract expirations**



**Table 5: Resource needs across QF sensitivities**

	High QF	Base QF	Low QF
<b>2025 Capacity Need (MW)</b>	674681	685697	738713
<b>2025 Energy Shortage (MWa)</b>	435492	58527	28589
<b>2030 RPS Physical Shortage (MWa)</b>	228155	70190	42253

## 6 Conclusion

The updates to the need assessments resulted in some changes to the capacity, energy, and RPS positions, but those changes are small relative to the magnitude of PGE’s resource needs and are well within the margin of uncertainty considered within the 2019 IRP. PGE continues to recommend the actions described in the Action Plan and as modified in PGE’s Reply Comments filed on November 5, 2019.

In the Reference Case in the year 2025, capacity need increased from 685 MW to 697 MW. Figure 3 shows the relative impacts from the resource updates and the load forecast update.

**Figure 3: Capacity impacts of resource and load updates**

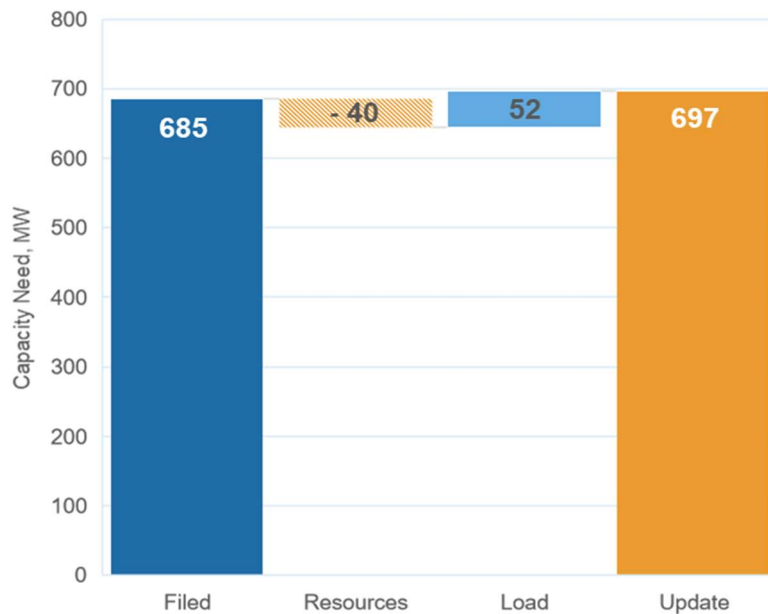
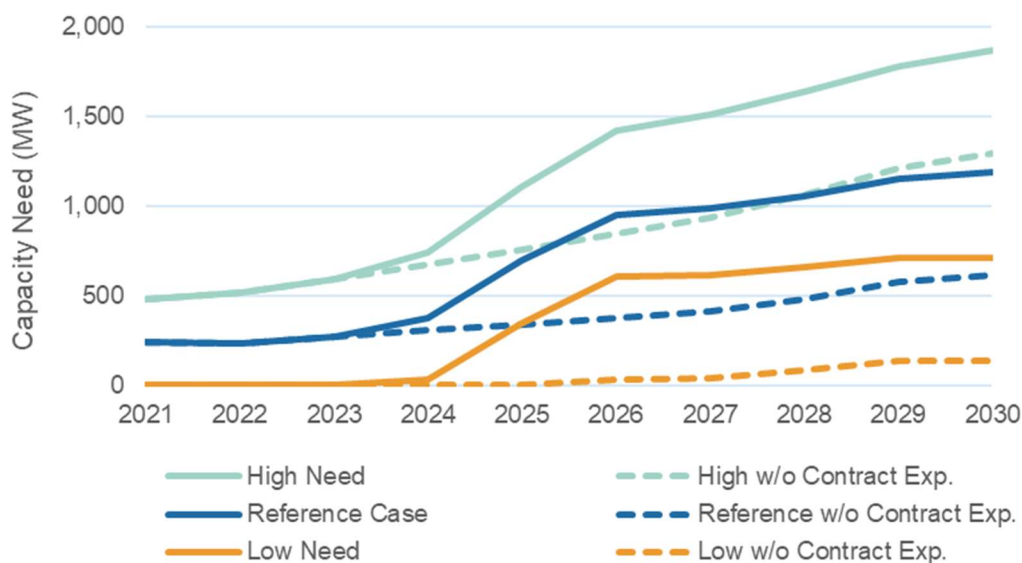


Figure 4 shows the updated capacity need in the Low, Reference, and High Need Futures. It also shows the need if the contracts expiring through the end of 2025 are assumed to be renewed or replaced with other existing resources of equal size. Note that as discussed in Section 1, the Low and High Need Futures reflect updated resource information and do not have updated load forecasts. This updated analysis continues to identify that PGE has significant forecasted capacity needs in the Reference Case with a large range of uncertainty in the mid-2020s, and that contract expirations drive a substantive portion of that need. This update does not necessitate a change to PGE’s staged capacity action in the Action Plan.

**Figure 4: Capacity need across Need Futures and impact of contract expirations**



**Table 5: Resource needs across QF sensitivities**

	High QF	Base QF	Low QF
<b>2025 Capacity Need (MW)</b>	681	697	713
<b>2025 Energy Shortage (MWa)</b>	492	527	589
<b>2030 RPS Physical Shortage (MWa)</b>	155	190	253

## 6 Conclusion

The updates to the need assessments resulted in some changes to the capacity, energy, and RPS positions, but those changes are small relative to the magnitude of PGE’s resource needs and are well within the margin of uncertainty considered within the 2019 IRP. PGE continues to recommend the actions described in the Action Plan and as modified in PGE’s Reply Comments filed on November 5, 2019.