

February 17, 2021

**Via Electronic Mail**

Erin Apperson  
Portland General Electric Company  
121 SW Salmon St, 1WTC1301  
Portland, OR 97204  
Erin.apperson@pgn.com

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, 2019 Integrated  
Resource Plan  
Docket No. LC 73

Dear Ms. Apperson:

Please find the Renewable Energy Coalition's ("REC") second set of data requests to Portland General Electric ("PGE") in this proceeding. PGE has thirteen days to respond to data request 13, or by March 2, 2021, and fourteen days to respond to the rest of the data request, or by March 3, 2021. Given that opening comments are due on March 4, 2021, REC requests that PGE respond by February 24, 2021.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Irion Sanger  
Irion Sanger

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 73**

In the Matter of	)	
	)	RENEWABLE ENERGY
PORTLAND GENERAL ELECTRIC	)	COALITION’S SECOND SET OF
COMPANY	)	DATA REQUESTS TO PGE
	)	
2019 Integrated Resource Plan	)	
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Dated: February 17, 2021

I. DEFINITIONS

1. “Documents” refers to all writings and records of every type in your possession, control, or custody, whether or not claimed to be privileged or otherwise excludable from discovery, including but not limited to: testimony and exhibits, memoranda, papers, correspondence, letters, reports (including drafts, preliminary, intermediate, and final reports), surveys, analyses, studies (including economic and market studies), summaries, comparisons, tabulations, bills, invoices, statements of services rendered, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data (including E-mail), computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, workpapers, engineering diagrams (including “one-line” diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical, or otherwise, and drafts of any of the above.

“Documents” includes copies of documents, where the originals are not in your possession, custody or control.

“Documents” includes every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.

“Documents” also includes any attachments or appendices to any document.

2. “Identification” and “identify” mean:

When used with respect to a document, stating the nature of the document (e.g., letter, memorandum, corporate minutes); the date, if any, appearing thereon; the date, if known, on which the document was prepared; the title of the document; the general subject matter of the document; the number of pages comprising the document; the identity of each

person who wrote, dictated, or otherwise participated in the preparation of the document; the identity of each person who signed or initiated the document; the identity of each person to whom the document was addressed; the identity of each person who received the document or reviewed it; the location of the document; and the identity of each person having possession, custody, or control of the document.

When used with respect to a person, stating his or her full name; his or her most recently known home and business addresses and telephone numbers; his or her present title and position; and his or her present and prior connections or associations with any participant or party to this proceeding.

3. "PGE" refers to Portland General Electric Company, or any officer, director or employee of Portland General Electric Company, or any affiliated company.
4. "Person" refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.
5. "Studies" or "study" includes, without limitation, reports, reviews, analyses and audits.
6. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this discovery any information or documents which might otherwise be considered to be beyond their scope.
7. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular, whenever appropriate in order to bring within the scope of this discovery request any information or documents which might otherwise be considered to be beyond their scope.

## II. INSTRUCTIONS

1. These requests call for all information, including information contained in documents, which relate to the subject matter of the Data Request and which is known or available to you.
2. Where a Data Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part or portion. Any objection to a Data Request should clearly indicate the subdivision, part, or portion of the Data Request to which it is directed.
3. The time period encompassed by these Data Requests is from 2005 to the present unless otherwise specified.

4. Each response should be furnished on a separate page. In addition to hard copy, electronic versions of the document, including studies and analyses, must also be furnished if available.
5. If you cannot answer a Data Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you cannot answer the Data Request in full, and state what information or knowledge you have concerning the unanswered portions.
6. If, in answering any of these Data Requests, you feel that any Data Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Data Request.
7. If a document requested is unavailable, identify the document, describe in detail the reasons the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.
8. If you assert that any document has been destroyed, state when and why it was destroyed and identify the person who directed the destruction. If the document was destroyed pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program.
9. If you refuse to respond to any Data Request by reason of a claim of privilege, confidentiality, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document, and specify the number of pages it contains. Please provide: (a) a brief description of the document; (b) date of document; (c) name of each author or preparer; (d) name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis for withholding it.
10. Identify the person from whom the information and documents supplied in response to each Data Request were obtained, the person who prepared each response, the person who reviewed each response, and the person who will bear ultimate responsibility for the truth of each response.
11. If no document is responsive to a Data Request that calls for a document, then so state.
12. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

13. Whenever these Data Requests specifically request an answer rather than the identification of documents, the answer is required and the production of documents in lieu thereof will not substitute for an answer.
14. To the extent that the Company believes it is burdensome to produce specific information requested, please contact REC to discuss the problem prior to filing an answer objecting on that basis to determine if the request can be modified to pose less difficulty in responding.
15. To the extent the Company objects to any of the requests please contact REC to determine if the request can be modified to produce a less objectionable request.

### III. SECOND SET OF DATA REQUESTS:

13. Please provide supplemental data responses to REC Data Requests 1-12 in this proceeding. Please provide update to reflect new information or new modeling results. If there is no update, please state that there is no update.
14. Please see Table 6-6 in the 2019 IRP. Were the same locations used in calculating capacity values for the 2019 IRP Update? If no, what locations were used?
15. Please reference the 2019 IRP at 164, which states that “The capacity contribution values for individual resources were calculated for the Reference Case using the Renewable Energy Capacity Planning (RECAP) model.” Please provide the capacity contribution rates, including but not limited to ELCC rates, for the Updated Reference Case using the RECAP model.
16. Please reference the 2019 IRP at 281, which states that “The 2019 IRP includes 132 QF contracts executed as of December 18, 2018, totaling approximately 601 MW.” Please indicate: 1) the number of QF contracts executed as of the IRP Update snapshot date; and 2) the total MW.
17. Please reference PGE’s Reply Comments filed November 5, 2019, which stated on page 62 that “In the upcoming months, PGE will likely see additional executions, delays, and terminations of projects – though potentially at a significantly different pace than in 2016 and 2017.” Please explain whether PGE saw “additional executions, delays, and terminations of projects” and describe these additions, if any.
18. Please provide all workpapers in original electronic format for PGE’s 2019 IRP Update.
19. Please reference the 2019 IRP Update, which states that “Approximately 93 MW of Community Solar resources were included in the modeling of the Baseline Portfolio, with half of the Community Solar resources beginning in January 2022 and the second half beginning in January 2023.”

- a. On what basis is PGE projecting that “half of the [approximately 93 MW of] Community Solar resources [will] begin[] in January 2022”?
  - b. Order No. 19-438 approved an Interim Offering for the Community Solar Program in PGE’s service territory of 46.57 MW, or 50% of PGE’s initial capacity limit of 93.15 MW. On what basis is PGE included the full 93.15 MW in its Baseline Portfolio? On what date is PGE projecting that the Commission will open the additional 46.57 MW of space to new projects?
  - c. On what basis is PGE projecting that the “second half [will] begin[] in January 2023”?
20. Please provide all workpapers in original electronic format for PGE’s Supplemental Filing.
21. Please reference page 3 of PGE’s Supplemental Filing, which states that “the decline in the marginal ELCC value for solar is primarily due to approximately 200 MW of additional solar resource in the Baseline Portfolio since the analysis for the 2019 IRP.” Please provide the marginal ELCC value for solar if: 1) total capacity of Community Solar resources included in the Baseline Portfolio is reduced from approximately 93 MW to 46.57 MW; 2) if the estimated on-line date for the first 46.57 MW of Community Solar resources is January 2023 instead of January 2022; and 3) if the estimated on-line date for the second 46.57 MW of Community Solar resources is January 2024 instead of January 2023.