

April 22, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 2059—PacifiCorp’s Final Draft 2020AS RFP

PacifiCorp d/b/a Pacific Power (PacifiCorp) hereby submits its final draft 2020 all-source request for proposals (2020AS RFP). Consistent with the Public Utility Commission of Oregon’s (Commission) Competitive Bidding Rules (Rules),¹ PacifiCorp respectfully requests the Commission solicit comments on and approve the final draft 2020AS RFP. PacifiCorp’s request for approval of the 2020AS RFP does not assume Commission acknowledgment of PacifiCorp’s 2019 Integrated Resource Plan (IRP), but simply preserves the option for PacifiCorp to transition to a cleaner energy future by acquiring significant renewable resources. To take into account the concurrent processes of 2020AS RFP and 2019 IRP review, PacifiCorp timed the 2020AS RFP so that Commission acknowledgment of the final shortlist will not occur until *after* the Commission issues its acknowledgement order on the 2019 IRP.²

PacifiCorp filed an Application for Approval of the 2020AS RFP with the Commission on February 24, 2020, in this docket (Application). On April 7, 2020, the Commission approved the selection of PA Consulting as the independent evaluator (IE). PacifiCorp then sent parties the draft 2020AS RFP and responded to questions and feedback on the RFP design through written questions and workshops. PA Consulting submitted initial comments on the draft 2020AS RFP to the Commission on April 20, 2020; the company reviewed these comments and has incorporated certain revisions in response as addressed more fully below. PacifiCorp now requests approval of the final draft 2020AS RFP. Enclosed for filing and comment is PacifiCorp’s final draft 2020AS RFP. This draft is the result of a fair and transparent process involving the IE and stakeholders.

I. SUMMARY AND BACKGROUND OF THE 2020AS RFP

The 2019 IRP preferred portfolio includes accelerated coal retirements and investment in transmission infrastructure that will facilitate adding over 6,400 megawatts (MW) of new renewable resources by the end of 2023, with nearly 11,000 MW of new renewable resources

¹ OAR 860-089-0010 *et seq.*, Resource Procurement by Electric Companies.

² The Commission will deliberate on the 2019 IRP at a special public meeting scheduled for May 7, 2020. The company will not submit the final short list for Commission acknowledgement until 2021 under the current proposed schedule for the 2020AS RFP.

over the 20-year planning period through 2038. As a result, the 2019 IRP established an action item to conduct an all-source RFP in 2020. The 2020AS RFP is designed to meet this action item, and is an all-source RFP including renewable and non-renewable resources as well as energy storage, capable of interconnecting with or delivering to PacifiCorp's transmission system in its east or west balancing authority areas. The 2019 IRP also identified the need for additional firm capacity in 2024 of over 950 MW even after accounting for committed resources, expected incremental procurement of energy efficiency, and planned early retirements. The amount of "firm" capacity from new generating resources being contemplated in the 2020AS RFP, based on preferred portfolio resource selections, totals just over 730 MW. The 2020AS RFP will procure resources to reduce PacifiCorp's capacity deficit during the 2019 IRP Action Plan timeframe. If the company does not acquire additional resources through the 2020AS RFP it risks meeting its reliability obligations.

The 2020AS RFP is designed to capture a time-limited resource opportunity arising from the expiration of federal tax credits (production tax credits (PTCs) and investment tax credits (ITCs)) and to allow PacifiCorp to acquire the transmission rights-of-way to achieve the necessary commercial operation date for the Energy Gateway South transmission project that is expected to be necessary for interconnection of the resulting resource acquisition. Initiating the 2020AS RFP process at this time will allow PacifiCorp to identify the winning bids by early June 2021; this timing is needed to support other potential regulatory processes, if necessary, such as the significant energy resource decision process in Utah and acquiring certificates of public convenience and necessity for related transmission projects.

PacifiCorp filed its 2019 IRP with the Commission on October 18, 2019, in docket LC 70. Commission consideration of the 2019 IRP is currently scheduled for a public meeting on May 7, 2020. PacifiCorp proposes to issue the 2020AS RFP on July 6, 2020, after a Commission decision on the 2019 IRP is expected. This timing would allow revisions to the final RFP prior to a Commission decision; Commission deliberations on the final draft 2020AS RFP are expected to occur at the public meeting scheduled for July 2, 2020. By commencing the RFP process prior to IRP acknowledgement, PacifiCorp is able to facilitate the timeline necessary to meet its resource need, incorporate any revisions out of the IRP deliberation, and allow the company to solicit bids that can take advantage of PTCs and ITCs for the benefit of customers.³

The 2020AS RFP contains the following components:

- Seeks up to 1,823 MW of new proxy solar resources co-located with 595 MW of new proxy battery energy storage system capacity and 1,920 MW of new proxy wind resources.⁴

³ This timeline is permitted by § OAR 860-089-250(2)(a) which allows development of an RFP outside of the IRP process.

⁴ The figures for solar and wind exclude resource capacity added to meet assumed customer preference targets that are included in the 2019 IRP preferred portfolio.

- Projects must achieve a commercial operation date of no later than December 31, 2024. The company will also consider long-lead time resources such as nuclear and pumped storage hydro.
- Projects must interconnect with or deliver to PacifiCorp's transmission system, targeting the specific topology and resource mix identified in the 2019 IRP topology. Bidders with projects not interconnected to the company's system must secure transmission service to the company's system.
- Bid Fee(s) of \$10,000 required for each base proposal and one alternative. Bidders may offer up to three additional alternatives at a fee of \$3,000 each.
- Two IEs, one each for Utah and Oregon.
- Intent to bid form and bidder credit information required before bid submittal(s).
- Bids accepted for build-transfer structures as a Build-Transfer Agreement and/or power purchase agreements using pro forma agreements. Standalone battery storage would be contracted through a battery storage agreement.
- Initial shortlist determined on price and non-price factors.
- Final shortlist determined using economic analysis and production cost modeling to select the least cost/risk adjusted mix of bids in PacifiCorp's resource portfolio.
- Post-bid negotiations on price and non-price issues will be limited.

II. STAKEHOLDER ENGAGEMENT AND OVERALL FAIRNESS OF PROCESS

PacifiCorp's 2020AS RFP has and will continue to include robust participation by the IE and stakeholders. To ensure a transparent and fair process, and consistent with the Rules, the 2020AS RFP is being conducted under the oversight of PA Consulting. The IE was approved by the Commission after stakeholder review and input.⁵ Staff reviewed the IE bidders and held a workshop with stakeholders on March 20, 2020, to discuss selection of the IE. The company also responded to requests for additional information from Staff and the Northwest and Intermountain Power Producers following the workshop. At the April 7, 2020 special public meeting, the Commission considered stakeholder comments and adopted Staff's recommendation and selected PA Consulting as the IE.⁶

On April 9, 2020, PacifiCorp distributed the draft 2020AS RFP to parties and interested persons from the company's pending general rate case and IRP dockets and most recent RFP docket. On April 17, 2020, PacifiCorp held a stakeholder workshop to solicit feedback as part of the 2020AS RFP design process. The IE submitted initial comments on April 20, 2020. This feedback is reflected in this draft to address concerns including the following:

- The company revised the RFP objective to make clear that PacifiCorp seeks bids that will provide least-cost, least-risk resources consistent with the intent of the company's IRP.
- The company added language to the RFP to make clear that while renewable resources have the possibility to provide renewable portfolio standard (RPS) compliance benefits,

⁵ PacifiCorp included the IE RFP as Attachment A to its Application.

⁶ See Order No. 20-114.

this compliance is not an explicit goal of the RFP process and RPS-compliant resources will not be prioritized.

- PacifiCorp revised the RFP purpose and scope to clarify that PTC-eligibility is based on a bidder securing safe-harbor equipment, not just beginning construction in 2020. The company also modified the footnote explaining that the full ITC benefit requires an on-line date by December 31, 2023, but that all bids will be accepted with on-line dates up through December 21, 2024, excluding specific long-lead time resource types.
- PacifiCorp added a minimum contract term length of 15 years.
- PacifiCorp has added a footnote in Section 6.A.2 of the RFP to reflect that the capacity numbers from the IRP preferred portfolio were capacity available via enabling transmission upgrades in each location associated with the IRP preferred portfolio.
- The company has agreed to establish locational resource pools by resource type with non-battery storage categories separate by each resource type (*e.g.*, wind, solar, etc.). If no resource type is identified, the category will be removed at such location.
- PacifiCorp has revised the RFP to include a definition for Customer Cost to make clear that Customer Cost will be defined as the revenue requirement associated with the bid.
- PacifiCorp revised the RFP eligibility criteria to include individual state MW thresholds for avoided cost schedules.
- The company has added language to the RFP to make clear that bids selected for the initial shortlist will have an opportunity to update bid prices on April 22, 2021.
- PacifiCorp has corrected the deadline for bid fee wire instructions; the deadline is five business days before August 10, 2020.

PacifiCorp will continue to receive feedback from parties—this includes parties’ written comments on the final draft 2020AS RFP and the opportunity to comment at the public meeting. Pursuant to the current procedural schedule in this proceeding, PacifiCorp will file reply comments on June 1, 2020, that will address any additional necessary revisions prior to Commission deliberation.

III. 2020AS RFP COMPLIANCE WITH COMMISSION RULES

Below is a summary explaining how the 2020AS RFP will comply with the Rules; this summary expands on the information provided in the company’s Application.

A. Applicability of the Rules

The Commission’s Rules require utility compliance when an acquisition is sought of a resource or a contract for more than an aggregate of 80 MW and five years in length.⁷ As discussed above, the 2020AS RFP seeks to acquire resources far in excess of this size threshold based on analysis performed to develop the 2019 IRP.

⁷ OAR § 860-089-0100(1)(a).

B. Engagement of an Independent Evaluator

The Commission's Rules require engagement of an IE for any resource acquisition under the Rules.⁸ The Commission selected PA Consulting as the IE for the 2020AS RFP and the company has engaged PA Consulting.⁹ The company's IE RFP and subsequent contract with PA Consulting included an outline of the IE's duties pursuant to the Rules.¹⁰

PA Consulting submitted its initial comments on the draft 2020AS RFP to the Commission on April 20, 2020. The company continues to engage with the IE as required by the Rules.

C. Design of the 2020AS RFP

The Rules require approval of an RFP's scoring and modeling methodology where such RFP does not rely on an RFP design and scoring and modeling methodology included as part of a Commission-acknowledged IRP.¹¹ The company complied with this requirement by including its proposed scoring and modeling methodology for the 2020AS RFP together with its Application; the company's Application requested approval of the proposed scoring and modeling methodology when an IE was selected. Commission Staff requested a waiver of this requirement in order to allow additional time for Staff to consider PacifiCorp's proposed scoring and modeling for the 2020AS RFP. The Commission granted this waiver request at the April 7, 2020 public meeting.¹² As a result, the scoring and modeling are being considered as part of the complete draft 2020AS RFP review.

The 2020AS RFP as an all-source RFP has been designed to account for resource as well as locational diversity by targeting MW capacity in specific geographical areas across PacifiCorp's system. The draft 2020AS RFP also sets forth all minimum bidder requirements for bid eligibility, credit, and bidder capability and provides the standard form agreements or termsheets that will be used for resource acquisition.¹³ The 2020AS RFP includes language in Section 7(D) to allow bidders to negotiate deviations from the standard form contracts that are mutually agreeable.¹⁴ Section 7.F of the 2020AS RFP describes how PacifiCorp will share information with bidders, including when such information will be shared.¹⁵ Finally, the draft 2020AS RFP allows qualifying facilities that exceed the eligibility cap for standard avoided cost pricing to participate as bidders.¹⁶

⁸ OAR § 860-089-0200(1).

⁹ OAR § 860-089-0200(3).

¹⁰ See OAR § 860-089-0450. See also PacifiCorp's Application.

¹¹ OAR § 860-089-0250(2)(a).

¹² See Order 20-114.

¹³ OAR § 860-089-0250(3). See draft 2020AS RFP, Section 3(I); see also draft 2020AS RFP Appendices E-2 and F-2.

¹⁴ OAR § 860-089-0250(3)(d).

¹⁵ OAR § 860-089-0250(3)(e).

¹⁶ OAR § 860-089-0250(4). Qualifying facilities are defined under the Rules as qualifying facilities under 16 USC § 796(17) and (18) and ORS 758.505(8). See draft 2020AS RFP, §1(b) for language addressing treatment of qualifying facilities.

D. Resource Ownership

PacifiCorp is not submitting any self-build ownership proposals (benchmark resources) in the 2020AS RFP and is not accepting any bids from any PacifiCorp affiliate.¹⁷

E. Benchmark Resource Score

As noted above, the company is not submitting any benchmark resources.

F. Bid Scoring and Evaluation

PacifiCorp has included its proposed scoring criteria and metrics as part of the final draft 2020AS RFP.¹⁸ The company also included its proposed scoring and modeling methodology as part of the IE RFP submitted with its Application. PacifiCorp's bid scoring and ranking evaluation for its initial shortlist proposes to base seventy-five percent of bid scores on price factors and twenty-five percent on the following non-price factors:¹⁹ conformance to pro forma power purchase agreement documents and RFP requirements, and project readiness.²⁰ The company will use qualified and independent third-party experts to review site-specific critical performance factors for any wind and solar resources and battery storage bids selected for the initial short list before modeling the effects of such resources in its final shortlist evaluation.²¹ PacifiCorp will also conduct a sensitivity analysis of its bid rankings to demonstrate the degree to which the rankings are sensitive to changes in both non-price scores and assumptions; the company will provide full access to this sensitivity analysis to the Commission and IE.²²

G. Final Short List Acknowledgement and Result Publication

The company will submit its request for acknowledgement of the final short list consistent with the requirements set forth in the Rules.²³ PacifiCorp will also comply with all publication and bidder score communication request requirements.²⁴

The Rules require acknowledgment by the Commission before PacifiCorp can engage in contract negotiations with bidders.²⁵ The company has noted that it may seek a waiver of this requirement to allow it to commence contract negotiations after selection of the initial short list. Bidders selected for the initial short list that require a new interconnection agreement will be

¹⁷ Affiliate is defined as a Berkshire Hathaway Energy Company and its subsidiaries. See draft 2020AS RFP, §1(F).

¹⁸ OAR § 860-089-0400(1). See draft 2020AS RFP, § 6(A)(2); see also draft 2020AS RFP, Appendix L.

¹⁹ See OAR 860-089-0400(2)(b) (non-price criteria should be tied to resource characteristics identified in the IRP or conformance to standard contract forms; these non-price criteria relate to the timing need for new resources identified in the 2019 IRP and conformance with standard contract forms).

²⁰ See OAR § 860-089-0400(2) (*stating* that scoring of bids and selection of the initial short list should be based on price and appropriate non-price factors).

²¹ OAR § 860-089-400(5)(a).

²² OAR § 860-089-0400(5)(b) and (6).

²³ OAR § 860-089-0500(3).

²⁴ OAR § 860-089-0500(5) and (6).

²⁵ OAR § 860-089-0500(2).

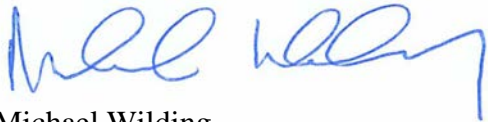
required to participate in a transition interconnection cluster study to be initiated in October 2020. This cluster study process is part of the company's pending interconnection transmission queue proposal submitted to the Federal Energy Regulatory Commission (FERC) on January 31, 2020 and will identify network upgrades required for interconnection such that any upgrades can be considered as part of the final short list selection. Assuming approval of the transmission queue reform proposal by FERC, the company would seek a waiver if it determined that commencement of contract negotiations is necessary to facilitate the RFP timeline and to avoid losing momentum during the interconnection cluster study process.

IV. NEXT STEPS

PacifiCorp appreciates parties' active engagement in development of the 2020AS RFP, particularly in light of the accelerated time frame. Commission Staff filed an updated procedural schedule on April 16, 2020, that sets forth a schedule for comments on and consideration of the 2020AS RFP through a decision on the final version of the 2020AS RFP. This schedule was developed with input from the company and stakeholders and will allow PacifiCorp to issue the 2020AS RFP in July 2020 to facilitate bids that can take advantage of expiring federal tax credits. This timeline also allows selected bids to participate in a PacifiCorp Transmission's transition interconnection cluster study in October 2020.

If you have questions about this filing, please contact Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,



Michael Wilding
Director, Regulation

Enclosure

cc: Service list UM 2059

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Final Draft 2020 All Source Request for Proposals on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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Dated this 22nd day of April, 2020.



Mary Penfield
 Adviser, Regulatory Operations

CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of PacifiCorp’s **Final Draft 2020AS RFP** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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Dated April 22, 2020.



Mary Penfield
Adviser, Regulatory Operations

CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **Final Draft 2020 All Source Request for Proposals** on the parties listed below via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.

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Dated this 22nd day of April, 2020.



Mary Penfield
Adviser, Regulatory Operations

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp’s **Final Draft 2020AS RFP** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

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UM 1845**

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Dated April 22, 2020.



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