



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

Erin E. Apperson
Assistant General Counsel
erin.apperson@pgn.com

April 28, 2021

Via Electronic Filing


Oregon Public Utility Commission
Attn: Filing Center
201 High Street Southeast Suite 100
Post Office Box 1088
Salem, Oregon 97301

Re: UM XXXX – Portland General Electric Company’s Application for Approval of an Independent Evaluator for 2021 All-Source RFP

Attention Filing Center:

Please find enclosed for filing, Portland General Electric Company’s (PGE) Notice and Request to Open an Independent Evaluator Selection Docket. PGE has notified parties of this filing from the following dockets: UE 335 (PGE’s prior general rate case); LC 73 (PGE’s 2019 IRP); and UM 1934 (PGE’s 2018 Request for Proposals for Renewable Resources). PGE has requested feedback regarding potential Independent Evaluator candidates from Staff and Stakeholders by Monday, May 3, 2021.

Thank you in advance for your assistance.

Sincerely,

Erin E. Apperson
Assistant General Counsel

EEA: dm
Enclosure

CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of **Portland General Electric Company's Application for Approval of an Independent Evaluator for 2021 All-Source RFP** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

Service List UE 335

ALBERTSONS	
Brian Bethke 250 Parkcenter Boulevard Boise, Idaho 83706 Brian.bethke@albertsons.com	Chris Ishizu 250 Parkcenter Boulevard Boise, Idaho 83706 chris.ishizu@albertsons.com
George Waidelich 11555 Dublin Canyon Road Pleasanton, Oregon 94588 George.waidelich@albertsons.com	
ALLIANCE OF WESTERN ENERGY CONSUMERS (AWEC)	
Bradley Mullins Mountain West Analytics Vihiluoto 15 Kepele, FI 90440 brmullins@mwanalytics.com	Tyler C. Pepple Davis Van Cleve, PC 1750 Southwest Harbor Way, Suite 450 Portland, Oregon 97201 tcp@dvclaw.com
Robert Sweetin Davis Van Cleve, PC 185 East Reno Avenue, Suite B8C Las Vegas, Nevada 89119 rds@dvclaw.com	
CALPINE SOLUTIONS	
Gregory M. Adams Richardson Adams, PLLC Post Office Box 7218 Boise, Idaho 83702 gred@richardsonadams.com	Greg Bass 401 West A Street, Suite 500 San Diego, California 92101 Greg.bass@calpinesolutions.com
Kevin Higgins Energy Strategies, LLC 215 State Street, Suite 200 Salt Lake City, Utah 84111 khiggins@energystrat.com	

FRED MEYER	
Kurt J. Boehm Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 kboehm@bkllawfirm.com	Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 jkylercohn@bkllawfirm.com
NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION (NIPPC)	
Robert D. Kahn Post Office Box 504 Mercer Island, Washington 98040 rkahn@nippc.org	Spencer Gray sgray@nippc.org
Irion A. Sanger Sanger Law PC 1041 Southeast 58 th Place Portland, Oregon 97215 irion@sanger-law.com	Joni L. Sliger Sanger Law PC 1041 Southeast 58 th Place Portland, Oregon 97215 joni@sanger-law.com
OREGON CITIZENS UTILITY BOARD (CUB)	
Oregon Citizens' Utility Board 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 dockets@oregoncub.org	Michael Goetz 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 mike@oregoncub.org
Robert Jenks 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 bob@oregoncub.org	
PACIFICORP	
Pacificorp dba Pacific Power 825 Northeast Multnomah Street, Suite 2000 Portland, Oregon 97232 oregondockets@pacificorp.com	Matthew McVee 825 Northeast Multnomah Street Portland, Oregon 97232 Matthew.mcvee@pacificorp.com
SMALL BUSINESS UTILITY ADVOCATES	
James Birkelund 548 Market Street, Suite 11200 San Francisco, California 94104 james@utilityadvocates.org	Diane Henkels 621 Southwest Morrison Street, Suite 1025 Portland, Oregon 97205 diane@utilityadvocates.org

STAFF	
Stephanie S. Andrus PUC Staff Department of Justice Business Activities Section 1162 Court Street Northeast Salem, Oregon 97301-4096 Stephanie.andrus@state.or.us	Marianne Gardner Public Utility Commission of Oregon Post Office Box 1088 Salem, Oregon 97308 Marianne.gardner@puc.oregon.gov
Sommer Moser PUC Staff Department of Justice 1162 Court Street Northeast Salem, Oregon 97301 Sommer.moser@doj.state.or.us	
WALMART	
Vicki M. Baldwin Parsons Behle & Latimer 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 vbaldwin@parsonsbehle.com	Steve W. Chriss 2001 Southeast 10 th Street Bentonville, Arkansas 72716 Stephen.chriss@wal-mart.com

Dated this 28th day of April, 2021.

Danielle McCain

Danielle McCain
Legal Assistant

CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of **Portland General Electric Company's Application for Approval of an Independent Evaluator for 2021 All-Source RFP** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

Service List LC 73

Charlie Coggeshall EQ Research 1155 Kildaire Farm Road, Suite 202 Cary, Oregon 27511 regtrackdsire@gmail.com	Carl Fink Blue Planet Energy Law LLC 628 Southwest Chestnut Street, Suite 200 Portland, Oregon 97219 cmfink@blueplanetlaw.com
John Lowe Renewable Energy Coalition Post Office Box 25576 Portland, Oregon 97298 jravenesanmarcos@yahoo.com	Caroline Moore Public Utility Commission of Oregon Post Office Box 1088 Salem, Oregon 97308 Caroline.f.moore@puc.oregon.gov
Tyler C. Pepple Davison Van Cleve, PC 1750 Southwest Harbor Way, Suite 450 Portland, Oregon 97201 tcp@dvclaw.com	Johanna Riemenschneider PUC Staff Department of Justice Business Activities Section 1162 Court Street Northeast Salem, Oregon 97301 Johanna.riemenschneider@doj.state.or.us
Nathan Sandvig RYE Development 220 Northwest 8 th Avenue Portland, Oregon 97209 nathan@ryedevelopment.com	Irion A. Sanger Sanger Law PC 1041 southeast 58 th Place Portland, Oregon 97215 irion@sanger-law.com
Joni L. Sliger Sanger Law PC 1041 Southeast 58 th Place Portland, Oregon 97215 joni@sanger-law.com	
OREGON CITIZENS UTILITY BOARD (CUB)	
Oregon Citizens' Utility Board 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 dockets@oregoncub.org	Michael Goetz 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 mike@oregoncub.org

<p>Robert Jenks 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 bob@oregoncub.org</p>	
GOLDENDALE ES	
<p>Michael Rooney RYE Development 830 Northeast Holladay Street Portland, Oregon 97232 Michael@ryedevelopment.com</p>	<p>Chris Zentz Van Ness Feldman LLP cdz@vnf.com</p>
NEWSUN ENERGY	
<p>Brittany Andrus andruspdx@gmail.com</p>	<p>Marie P. Barlow Newsun Energy LLC 390 Southwest Columbia Street, Suite 120 Bend, Oregon 97702 mbarlow@newsunenergy.net</p>
<p>Jacob (Jake) Stephens Newsun Energy 3500 South Dupont Highway Dover, Delaware 19901 jstephens@newsunenergy.net</p>	
NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION (NIPPC)	
<p>Spencer Gray NIPPC sgray@nippc.org</p>	
NW ENERGY COALITION	
<p>Fred Heutte NW Energy Coalition Post Office Box 40308 Portland, Oregon 97240 fred@nwenergy.org</p>	
RENEWABLE NORTHWEST	
<p>Max Greene Renewable Northwest 421 Southwest 6th Avenue, Suite 975 Portland, Oregon 97204 max@renewablenw.org</p>	<p>Renewable Northwest 421 Southwest 6th Avenue, Suite 975 Portland, Oregon 97204 dockets@renewablenw.org</p>

SWAN LAKE NORTH HYDRO LLC	
Erik Steimle Swan Lake North Hydro LLC 220 Northwest 8 th Avenue Portland, Oregon 97209 erik@ryedevelopment.com	Sidney Villanueva Swan Lake North Hydro LLC 100 Southwest Main Street, Suite 1000 Portland, Oregon 97204 Sidney.villanueva@troutman.com

Dated this 28th day of April, 2021.

Danielle McCain

Danielle McCain
Legal Assistant

CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of **Portland General Electric Company's Application for Approval of an Independent Evaluator for 2021 All-Source RFP** on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

Service List UM 1934

Michael Lapidés Goldman Sachs Michael.lapides@gs.com	Chris Bursaw Capital Power US Holdings LLC 155 Federal Street Boston, Massachusetts 02110 cbursaw@capitalpower.com
Gregory Reiss Centenus Global Management LP 437 Madison Avenue, 19 th Floor New York, New York 10022 Gregory.reiss@centenuslp.com	Chrlie Coggeshall EQ Research 1155 Kildaire Farm Road, Suite 202 Cary, Oregon 27511 Regtrackdsire@gmail.com
Gregory Adams Richardson Adamas, PLLC Post Office Box 7218 Boise, Idaho 83702 greg@richardsonadams.com	Jesse O. Gorgsuch Davison Van Cleve 1750 Southwest Harbor Way, Suite 450 Portland, Oregon 97201 jog@dvclaw.com
Bradley Mullins Mountain West Analytics 1750 Southwest Harbor Way, Suite 450 Portland, Oregon 97201 brmullins@mwanalytics.com	Tyler C. Pepple Davison Van Cleve, PC 1750 Southwest Harbor Way, Suite 450 Portland, Oregon 97201 tcp@dvclaw.com
Wendy Gerlitz NW Energy Coalition 1205 Southeast Flavel Portland, Oregon 97202 wendy@nwenergy.org	Renewable NW Dockets Renewable Northwest 421 Southwest 6 th Avenue, Suite 975 Portland, Oregon 97204 dockets@renewablenw.org
Michael O'Brien Renewable Northwest 421 Southwest 6 th Avenue, Suite 975 Portland, Oregon 97204 micahel@renewablenw.org	Silvia Tanner Renewable Northwest 421 Southwest 6 th Avenue, Suite 975 Portland, Oregon 97204 silvia@renewablenw.org

<p>OPUC Dockets Oregon Citizens' Utility Board 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 dockets@oregonsub.org</p>	<p>Michael Goetz Oregon Citizens' Utility Board 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 mike@oregoncub.org</p>
<p>Robert Jenks Oregon Citizens' Utility Board 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 bob@oregoncub.org</p>	<p>William Gehrke Oregon Citizens' Utility Board 610 Southwest Broadway, Suite 400 Portland, Oregon 97205 will@oregoncub.org</p>
<p>Irion A. Sanger Sanger Thompson PC 1041 Southeast 58th Place Portland, Oregon 97215 irion@sanger-law.com</p>	<p>Mark R. Thompson Saner Thompson PC 1041 Southeast 58th Place Portland, Oregon 97215 mark@sanger-law.com</p>
<p>Carl Fink Blue Planet Energy Law LLC 628 Southwest Chestnut Street, Suite 200 Portland, Oregon 97219 cmfink@blueplanetlaw.com</p>	<p>Fred Heutte NW Energy Coalition Post Office Box 40308 Portland, Oregon 97240 fred@nwenergy.com</p>
<p>Johanna Reimenscheider PUC Staff – Department of Justics Business Activities Section 1162 Court Street Northeast Salem, Oregon 97301 Johanna.reimenschneider@doj.state.or.us</p>	<p>Seth Wiggins Public Utility Commission of Oregon Post Office Box 1088 Salem, Oregon 97301 Seth.wiggins@state.or.us</p>

Brian Skeahan CREA Private Mail Box 409 18160 Cottonwood Road Sunriver, Oregon 97707 Brian.skeahan@yahoo.com	Robert D. Kahn Northwest & Intermountain Power Producers Coalition Post Office Box 504 Mercer Island, Washington 98040 rkahn@nippc.org
Carol Opatrny Northwest & Intermountain Power Producers Coalition 18509 Northeast Cedar Drive Battle Ground, Washington 98604 ccopat@e-z.net	

Dated this 28th day of April, 2021.

Danielle McCain

Danielle McCain
Legal Assistant

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM XXXX

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Approval of
Independent Evaluator for 2021
All-Source RFP.

**PORTLAND GENERAL ELECTRIC
COMPANY'S NOTICE AND REQUEST TO
OPEN AN INDEPENDENT EVALUATOR
SELECTION DOCKET**

In accordance with the competitive bidding rules adopted by the Public Utility Commission of Oregon (Commission),¹ Portland General Electric Company (PGE or Company) hereby provides notice of the commencement of the process to select an independent evaluator (IE) to oversee its 2021 All-Source Request for Proposals (RFP) and requests that the Commission open a docket for this purpose. The 2021 All-Source RFP is a solicitation process intended to address PGE's 2025 forecasted capacity shortfall of roughly 500 MWs.² This need can be met with renewable and non-emitting dispatchable resources that generally have a commercial operation date on or before December 31, 2024.³ The competitive bidding rules are triggered here due to the size and duration of the resources sought in this RFP, which is why PGE is commencing the process to select an IE.

The 2021 All-Source RFP aligns with PGE's action plan outlined in the 2019 IRP. The Commission acknowledged PGE's 2019 IRP in Order No. 20-152, subject to additional conditions and directives. Part of PGE's action plan from the 2019 IRP includes conducting a solicitation for dispatchable and renewable resources. The energy from the RFP may not exceed

¹ See OAR 860-089-0200(1).

² As outlined in PGE's Comments in the 2019 IRP Update proceeding, PGE continues to pursue bilateral negotiations for existing capacity in the region and will update its capacity need in the RFP to reflect any resource acquisitions and/or load updates.

³ As part of this RFP, PGE intends to accommodate long lead time resources like pumped hydro.

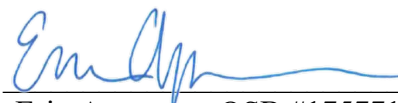
150 MWa, and any renewable resources must pass a cost containment screen and qualify for the federal production tax credit (PTC) or the federal investment tax credit (ITC). In PGE's IRP Update in LC 73, PGE indicated that it intends to conduct a single solicitation as it will identify portfolios of resources best suited to meet PGE's needs. PGE's 2019 IRP Update, which was acknowledged by the Commission at a special public meeting on April 20, 2021, contained no changes to its action plan.

Consistent with the competitive bidding rules, as part of this filing, PGE is providing notice to parties from Docket Nos. UE 335, LC 73, and UM 1934, which include its prior general rate case, IRP and RFP proceedings that it needs an IE. PGE will solicit feedback from Staff and stakeholders regarding the potential IE candidates consistent with OAR 860-089-0200(1). PGE requests that Staff and Stakeholders email rfp@pgn.com with suggestions for potential IE candidates by close of business on May 3, 2021. Following the receipt of feedback from interested stakeholders, PGE will issue the final IE RFP to potential bidders in early May. After receiving and scoring bids, PGE will host a virtual stakeholder workshop to discuss results and solicit additional feedback. As part of this process, PGE will then file a request for Commission approval to engage an IE consistent with OAR 860-089-0200(2).

PGE looks forward to working with Staff and interested parties throughout this process.

Dated this 28th day of April, 2021.

Respectfully submitted,



Erin Apperson, OSB #175771
Assistant General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(503) 464-8544 (phone)
(503) 464-2200 (fax)
Email: Erin.Apperson@pgn.com