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May 7, 2021

Via Electronic Mail

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Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Application to
Update Schedule 201 Qualifying Facility Information
Docket No. UM 1728

Dear Ms. Apperson:

Please find the Renewable Energy Coalition's ("REC") first set of data requests to Portland General Electric ("PGE") in this proceeding. PGE has fourteen days to respond to these data requests, or by May 21, 2021. REC asks that PGE provides the responses as they come available, and prior to May 21, 2021 if the Oregon Public Utility Commission sets a date for filing comments in May 2021.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Irion Sanger
Irion Sanger

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1728

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application to Update Schedule 201 Qualifying
Facility Information

RENEWABLE ENERGY
COALITION'S FIRST SET OF
DATA REQUESTS TO PGE

Dated: May 7, 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. FIRST SET OF DATA REQUESTS:

1. Please provide all current workpapers, including any workpapers as revised throughout this proceeding.
2. Please reference PGE's Supplemental Filing in Docket No. LC 73 at page 7, Table 4. Please provide the percentage changes to current avoided cost pricing from PGE's proposed update. Please provide the information in Excel format with working files.
3. Please reference PGE's Supplemental Filing in Docket No. LC 73 at page 3, which states "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 MW of additional resource rounded to at least two decimal points and a tabular breakdown of origin and size of the solar resources added to the baseline portfolio. Please provide the information in Excel format with working files.
4. Please reference PGE's Application at 3, which states that "the 2019 IRP Update included the approximately 93 MW from the CSP in the Baseline Portfolio, which is now incorporated into this avoided cost update. This "snapshot" also incorporated the anticipated QF contract terminations related to the Community Solar Settlement Agreement." For the solar resources in the Community Solar Settlement Agreement, please state: 1) the total capacity in MW; and 2) the total capacity in MW that was in the 2019 IRP baseline portfolio as an executed QF contract and was removed in this avoided cost update.
5. Please reference PGE's Application at 4, which states that "PGE includes all executed PURPA QF contracts in the Baseline Portfolio." Please identify all PURPA QF contracts that PGE has executed from January 1, 2015 to the present date. For each executed PURPA QF contract, please state: 1) the date of execution; 2) the QF size in MW; 3) the type of resource; 4) whether the contract was for a new resource or an existing resource; 5) the scheduled commercial operation date ("COD") in the unamended contract; 6) whether the scheduled COD was amended and, if so, the scheduled COD as amended; 7) whether the QF has achieved commercial operations and, if so, the date; 8) whether the contract

was terminated and, if so, the date, 9) whether the QF contract is currently in PGE's Baseline Portfolio; 10) when PGE assumes the QF will achieve commercial operations, if applicable; and 11) whether the contract has been terminated by PGE or the QF. Please provide the information in Excel format with working files.

6. Please reference PGE's Application at 4, which states that "Approximately 55% of PGE's QF contracts were executed from 2017 to 2021." Please provide support for this statement. Please identify the percentage of PGE's QF contracts that PGE executed in each year from 2010 to 2021. Please provide the information in Excel format with working files.
7. Please reference PGE's Application at 4, which states that "most QF contracts allow for four years to achieve Commercial Operation Date (COD)." When PGE includes in its baseline portfolio executed QF contracts with QFs whose scheduled COD has not passed as of the snapshot date, does PGE assume that the QF will come online on the scheduled COD in the unamended contract? If the answer is not an unequivocal yes, please provide the date on which PGE assumes that the QF will come online and a narrative explanation for this date.
8. Please reference PGE's Application at 4, which states that "As most QF contracts allow for four years to achieve Commercial Operation Date (COD), we anticipate most of these projects will come online this year, which will impact the current historical success rate of QFs coming online."
 - a. Please state as a percentage: 1) the "current historical success rate of QFs coming online"; 2) the number of QFs who came online on or before their scheduled COD in their unamended contract; and 3) the number of QFs who came online after the scheduled COD in their unamended contract.
 - b. Please provide a narrative summary of the impact to the current historical success rate that PGE anticipates from additional QFs coming online in 2021.
 - c. Please explain the use of the word "most" in this statement.
 - d. How many of these projects did PGE forecast to come online in 2020 or earlier in an Annual Power Cost Update Tariff proceeding?
 - e. How many of these projects is PGE forecasting to come online in 2021 in PGE's 2020 Annual Power Cost Update Tariff proceeding, Docket No. UE 391?
 - f. How many of these projects does PGE expect to not come online in: 1) 2021 or 2) a later year?
 - g. How many of these projects does PGE expect to come online in: 1) 2021, 2) 2022, 3) 2023, 4) 2024, 5) 2025, and 6) 2026 or later?
 - h. Please identify the total size in MW of QF contracts in PGE's 2019 baseline portfolio and in PGE's current baseline portfolio where the QF has: 1) notified PGE that it does not expect to achieve commercial operations by the scheduled COD in its unamended contract; 2) notified PGE that it does not expect to achieve commercial operations by the scheduled COD in any amended contract; 3) notified PGE that it does not

- expect to achieve commercial operations within any applicable cure period; 4) notified PGE that it does not expect to achieve commercial operations on schedule due to the QF's assertion of force majeure; or 4) notified PGE that the project seeks to terminate the contract. Please provide all relevant communications.
- i. Please identify the total size in MW of QF contracts in PGE's 2019 baseline portfolio and in PGE's current baseline portfolio where PGE has provided the QF a notice of default. For each notice, please identify: 1) the size of QF; 2) the type of QF; 3) the reason for the notice; 4) whether the default has been cured; 5) whether the time to cure has not yet passed, and 6) whether PGE intends to terminate the contract if the default is not cured.
9. Please reference PGE's application at 4, which states that "PGE currently has 602 MW of solar projects in its QF queue that are actively being negotiated."
 - a. Please for each QF (including non-solar projects) identify: 1) its size; 2) its resource type; 3) whether the project is on or off system; 4) whether it has requested indicative prices from PGE; 5) whether it has requested a QF contract from PGE; 6) whether PGE has provided a draft contract; 7) whether the QF has provided edits or revisions on the contract; 8) whether the QF has requested an executable contract; and 9) whether it has received an executed contract from PGE. Please provide the information in Excel format with working files.
 - b. Are any of the QF projects in PGE's QF queue existing QFs that have achieved commercial operations and are seeking a contract renewal? If so, has PGE included the QF project's operations after the current contract expiration date in any forecast for PGE's Annual Power Cost Update Tariff proceeding? If so, please identify the date(s) on which PGE forecasted the project(s) would come online for purposes of its Annual Power Cost Update Tariff proceeding. Please provide the information in Excel format with working files.
 10. Please provide PGE's standard and renewable avoided cost for baseload, solar, and wind QFs and state the ELCC using to derive those costs.
 - a. Please estimate the standard and renewable avoided cost for baseload, solar, and wind QFs and the applicable ELCC values if PGE assumed fewer than 100% of QFs with executed contracts achieved COD. Please provide these estimates if PGE assumed the following percentages of QFs achieved their scheduled COD: 1) 10%; 2) 20%; 3) 30%; 4) 40%; 5) 50%; 6) 60%; 7) 70%; 8) 80%; and 9) 90%.
 - b. Please estimate the standard and renewable avoided cost for baseload, solar, and wind QFs and the applicable ELCC values if PGE assumed more than 0% of QFs in PGE's QF queue obtain an executed contract and achieved COD within four years from today. Please provide these estimates if PGE assumed the following percentages of QFs obtained an executed contract and achieved COD four years from today: 1) 10%; 2) 20%; 3) 30%; 4) 40%; 5) 50%; 6) 60%; 7) 70%; 8) 80%; and 9) 90%.

- c. Please estimate the standard and renewable avoided cost for baseload, solar, and wind QFs and the applicable ELCC values if PGE assumed QFs with executed contracts achieved COD later than their scheduled COD by:
 - 1) 3 months, 2) 6 months, 3) 9 months, and 4) 12 months.