

July 19, 2023

**Via Electronic Mail**

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Re: In the Matter of PORTLAND GENERAL ELECTRIC CO., 2023 Clean Energy Plan and  
Integrated Resource Plan  
Docket No. LC 80

Dear Ms. Apperson and Ms. Sheeran:

Please find the Renewable Energy Coalition's ("REC") second set of data requests to Portland General Electric ("PGE") in this proceeding. PGE has committed to make best efforts to respond to data requests on the Addendum within five days, or by July 24, 2023. PGE has fourteen days to respond to data requests not related to the Addendum, or by August 2, 2023; however, given the expedited nature of this proceeding and comments due on July 27, REC requests that PGE respond as the responses are available and no later than by July 26, 2023. REC does not believe any of the responses should be confidential, and, if PGE disagrees, then REC requests that PGE explain the basis for any confidentiality designation with its responses.

Please do not hesitate to contact me with any questions.

Sincerely,



Joni Sliger

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 80**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

2023 Integrated Resource Plan and Clean  
Energy Plan

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

Dated: July 19, 2023

**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:

12. Please reference PGE's Responses to REC Data Requests 001 to 011. Please provide a supplemental answer to each prior Data Request that either (1) reflects changes from the Addendum or (2) indicates that there is no change resulting from the Addendum.
13. Please reference PGE's Addendum at 11-12 and PGE's IRP at 134. Is it still PGE's position that assuming a 100% success rate for Schedule 202 contracts is reasonable and appropriate?
14. Please reference PGE's Response to OPUC Data Request 127 and PGE's Response to REC Data Request 6. In what month and year does PGE's current contract with Covanta expire?
15. Please reference PGE's Addendum at 11 and 17. Please explain why Figure 5 indicates a 33 MW change in capacity need in summer 2028 relating to QFs when there have been "changes to qualifying facilities that have resulted in an approximately 161 MW nameplate net decrease of generation resources."
16. Please reference PGE's IRP at 120 and PGE's Addendum at 11. Please explain how the Addendum affects PGE's current forecasted amount of solar and forecasted ELCC for solar resources. Please provide updated numbers, if available.