



May 28, 2025

Via electronic filing

Oregon Public Utility Commission
Attn: Filing Center
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Re: Comments on Workshop #1
OPUC Docket AR 669 - Rulemaking to Amend Integrated Resource Plan Guidelines and Competitive Bidding Rules

Renewable Northwest (“RNW”) appreciates the opportunity to provide comments in AR 669, the Rulemaking to Amend Integrated Resource Plan (“IRP”) Guidelines and Competitive Bidding Rules (“CBRs”). This rulemaking flows from Staff’s investigation into IRP and request for proposals (“RFPs”) modernization that concluded with Commission Order No. 25-112. On May 7, 2025, Staff held its first workshop in this rulemaking and provided parties with proposed draft rules. RNW thanks Staff for their comprehensive translation of the concepts contemplated in UM 2348 into draft rules in AR 669. We largely support the proposed draft rules. In our comments below, we provide additional recommendations for IRP requirements based on an IRP best practices guide from Lawrence Berkeley National Lab.¹ These recommendations fit neatly into the existing concepts and structure of the draft rules. For the draft CBRs, our comments are mostly limited to clarifying questions.

This proceeding is timely as Oregon faces near-term needs to plan and procure resources needed to meet load growth and clean energy mandates in a cost-effective and timely manner. Amendments to the IRP guidelines and CBRs to create efficiencies and incorporate best practices in the planning and procurement space will aid the Commission and stakeholders in meeting Oregon’s energy needs while furthering the public interest.

¹ “Best Practices in Integrated Resource Planning: A guide for planners developing the electricity resource mix of the future.” Nov. 2024, available at <https://emp.lbl.gov/publications/best-practices-integrated-resource>

I. IRP Recommendations

RNW is encouraged by the changes to the IRP requirements and largely supports the draft rules as written. Instead of voicing support for each and every change, we focus our comments on additional recommendations we believe will bolster the draft IRP rules, based on the above-mentioned IRP Best Practices guide. These recommendations include: requiring utilities to providing modeling licenses to Commission Staff and intervenors, using evidence-based assumptions for market availability, putting guardrails on emerging technologies - particularly those with new fuels, transparently evaluating portfolios against multiple dimensions of cost and risk, and transparently incorporating HB 2021 compliance into IRP modeling. Transparency is a recurring theme in our recommendations. We firmly believe that improving transparency throughout the IRP process - from the inputs and assumptions utilities rely on to how they evaluate portfolios and model compliance with HB 2021 - will enable Staff, the Commission, and interested parties to better assess the IRP's validity and offer more informed recommendations, ultimately increasing confidence in utility planning.

A. Providing modeling licenses to Commission Staff and intervenors

One of the biggest challenges for intervenors in an IRP proceeding is the information asymmetry between the utility and the intervenor. RNW recommends adopting a provision within the IRP Guidelines that requires utilities to fund modeling software licenses for intervenors who have the technical capacity to review utility modeling files or conduct independent modeling. At a minimum, the rules should allow for parties to request access to utility modeling software. Providing access to the same modeling tools used by utilities will level the playing field and enhance transparency in IRP proceedings. It will allow intervenors to verify utility assumptions, test alternative portfolios, and offer improvements to utility plans. This, in turn, strengthens the Commission's ability to make informed decisions based on a more robust record that reflects the broader public interest. The cost of providing limited licenses to intervenors is relatively small compared to the potential benefits of more rigorous oversight and better long-term planning outcomes. While these licenses are typically cost prohibitive for intervenors, utilities - who already use these tools internally - are well positioned to provide access to intervenors under reasonable terms. This practice is already used in states like Wyoming where Commission Staff receives access to utility modeling software to vet and verify IRP assumptions.

We recommend adding this provision under OAR 860-090-0030 Integrated Resource Plan procedural requirements and OAR 860-090-0110 Integrated Resource Plan Updates. Our proposed draft language is as follows: When a utility's integrated resource plan relies on modeling software subject to a license fee, the utility must provide software licenses, at its own expense, to Commission Staff and to any interested party with the technical capability to review modeling files or conduct independent modeling.

Renewable Northwest, Climate Solutions, the NW Energy Coalition, and Rewiring America advocated for utilities to provide modeling software licenses to intervenors in the Washington Utilities and Transportation Commission's ("UTC") rulemaking to implement HB 1589, also known as the Integrated System Plan ("ISP") rulemaking². In February 20, 2025 comments, we highlighted several public utility commissions across the country that require utilities to provide licenses to interested parties in one form or another. The list included the Oregon Commission, which adopted a stipulation in PacifiCorp's 2021 Transition Adjustment Mechanism ("TAM") requiring the utility to provide AURORA licenses to Commission Staff and intervenors for each future TAM.³ Below are the remaining examples from our joint comments in Washington⁴:

- The Arizona Corporation Commission ordered Arizona Public Service Company, Tucson Electric Power Company, and UNS Electric Inc. to negotiate a project based licensing fee that permits up to 12 Resource Planning Advisory Council members and Staff to perform their own modeling runs, and to provide all necessary data and support to fully utilize the models. The utilities were ordered to absorb the costs of the licensing fees.⁵
- After undergoing a modeling collaborative ordered by the Michigan Public Service Commission, DTE Electric decided to provide a license for intervenors in the following IRP.⁶
- The South Carolina Public Service Commission ordered Dominion Energy to negotiate discounted, project-based licenses for intervenors to perform their own capacity expansion modeling runs in the same software and then directed the utility to absorb the cost of the licenses.⁷
- In 2023, the Iowa Utilities Board approved a settlement agreement between MidAmerican Energy Company and parties that requires the utility to provide each settlement party one project-specific intervenor license (not to exceed four total licenses)

² See [Docket U-240281](#)

³ Public Utility Commission of Oregon, Order No. 20-392, In the Matter of PacifiCorp, dba Pacific Power, 2021 Transition Adjustment Mechanism, UE 375, October 30, 2020. Available at: <https://apps.puc.state.or.us/orders/2020ords/20-392.pdf>

⁴ February 20, 2025 Comments of Renewable Northwest, Climate Solutions, NW Energy Coalition, and Rewiring America, U-240281. Available at: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=174&year=2024&docketNumber=240281>

⁵ Arizona Corporate Commission, Order No. 78499, In the Matter of Resource Planning and Procurement in 2019, 2020 and 2021, Match 2, 2022. P.14. Available at: <https://docket.images.azcc.gov/0000206081.pdf?i=1739318368959>

⁶ DTE Electric, Case U-20471, "DTE Electric's Integrated Resource Plan (IRP), Modeling Software Collaborative Summary Report" June 18, 2020. Available at: <https://mipsc.my.site.com/sfc/servlet.shepherd/version/download/068t000000CIEbLAAAX>

⁷ Public Service Commission of South Carolina, Docket No. 2019-226-E, Order No. 2020-832, Order Rejecting Dominion's Integrated Resource Plan and Requiring Dominion to Make Modifications to Its 2020 Integrated Resource Plan, Future Updates and Future Integrated Resource Plans. December 23, 2020. P. 92. Available at: <https://dms.psc.sc.gov/Attachments/Order/a4b59f43-e545-43bd-9f35-a846b7602c39>

for future Resource Evaluation Studies. Further, the utility agreed to provide access to the modeling inputs and settings used by MidAmerican without the need for a data request.⁸

- The Kentucky Public Service Commission ordered LG&E/KU to improve transparency and increase access to the software, inputs, and assumptions relied upon for their calculations in future cases, including IRP and QF rates. The utilities were ordered to provide their inputs and assumptions to intervening parties in their native formats and submit a filing that details how LG&E/KU will increase the transparency of their modeling to the Commission. The LG&E/KU plan must allow for one model re-run per intervening party and the Commission per proceeding.⁹
- The New Mexico Public Service Commission rules for electric Integrated Resource Plans requires electric utilities to "provide commission utility division staff and stakeholders who have signed a confidentiality agreement reasonable access to the same modeling software used by the utility on equal footing as the utility, and shall perform a reasonable number of modeling runs per staff or a stakeholder, if requested by staff or a stakeholder, in accordance with commission precedent, and the utility shall share all modeling information."¹⁰

The latest iteration of ISP draft rules includes a requirement for utilities to provide modeling licenses to staff and a limited number of intervenors.¹¹ RNW believes a similar requirement in Oregon would go a long way in supporting intervenor participation in IRPs and likely lead to better planning outcomes.

B. Using evidence-based assumptions for market availability

Utilities routinely rely on market purchases and sales to meet load, manage costs for customers, and maintain reliability. As such, assumptions around market availability must reflect actual market conditions, regional capacity constraints, and likely future resource developments. Unsupported assumptions can lead to adverse outcomes: overreliance on market purchases in a constrained market can lead to higher costs for customers and resource adequacy risks. On the other hand, failing to account for cost effective market opportunities can lead to overbuilding the system and forgoing cheaper energy and capacity. There is a balance to be found between over

⁸ Iowa Utilities Board, Docket No. RPU-2022-0001 Rehearing Final Order and Concurrence. December 14, 2023. See: Exhibit A to Revised Stipulation Agreement, Resource Evaluation Study Terms and Conditions, P.2. Available at: <https://efs.iowa.gov/filing/4517944>

⁹ 6 Public Service Commission of the Commonwealth of Kentucky, Docket No. 2020-00349 and 2020-00350, Electronic Application of Kentucky Utilities Company [and Louisville Gas and Electric Company] for an Adjustment of Its [Their] Electric Rates, A Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory And Accounting Treatments, and Establishment of a One-Year Surcredit. P. 29. Available at: https://psc.ky.gov/pscscf/2020%20Cases/2020-00350/20210924_PSC_ORDER.pdf

¹⁰ 17.7.3.9 NMAC - N, 10/27/2022; A, 11/29/2022. Available at: <https://www.srca.nm.gov/parts/title17/17.007.0003.html>

¹¹ April 8, 2025 version of ISP draft rules in U - 240281. Available at: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=199&year=2024&docketNumber=240281>

and under-reliance on market purchases. Rising utility costs in recent years that have been driven by reliance on market purchases demonstrate that Oregon should re-examine this balance.

The proposed draft rules include a provision to this effect, but RNW recommends making the requirement more explicit by adding additional language within OAR 860-090-0060 (7)(f). Specifically, we suggest adding the following underlined language after the existing draft rules:

In evaluating portfolios under this section, the utility must reasonably estimate future operations of the utility's system, including interactions between resources and interactions with energy markets. Utilities must use transparent and evidence-based assumptions around market availability and pricing.

RNW believes this requirement will push utilities to robustly and transparently analyze market conditions and lead to resource planning that more accurately captures regional dynamics. This provision should help the Commission and intervenors determine the level of market purchases in a portfolio to reliably and cost-effectively meet needs.

C. Putting guardrails on emerging technologies

Innovation undoubtedly plays a role in decarbonizing the grid reliably, rapidly, and cost effectively. However, given that the cost, timing, and availability of emerging technologies are difficult to predict, planning rules should encourage utilities to use transparent and defensible assumptions around emerging technologies. RNW recommends including additional language in OAR 860-090-0060 (7)(a)(B) to that effect:

The utility must consider both commercially available and emerging technologies as resource options based on defensible and transparent inputs and assumptions. For resources reliant on emerging fuels, the cost and availability of fuel supply, transport, and/or storage must be considered.

This language strikes a necessary balance by encouraging innovation while ensuring that utility plans are not overly reliant on speculative technologies or unsupported assumptions. In particular, the proposed language calls for more rigorous analysis of emerging technologies that depend on new fuel sources, recognizing that infrastructure to support those fuels may be nonexistent or require substantial upgrades. In addition, this language mitigates risks that may be caused by over-reliance on speculative technologies in the near-term by requiring defensible and transparent inputs and assumptions.

D. Transparently evaluating portfolios against multiple dimensions of cost and risk

The proposed draft rules include language around the evaluation and selection of the preferred portfolio using a balance of cost and risk. RNW recommends taking this one step further by encouraging utilities to select the portfolio with lower risks, where cost differences are marginal.

Resource planning should reflect more than just cost and risk minimization - it must also account for alignment with state decarbonization and other policy mandates.

Additionally, we suggest requiring the utility to transparently evaluate and compare resource portfolios across multiple dimensions of cost and risk by using a portfolio scoring matrix. A matrix provides a clear and effective visual tool for utilities to illustrate how each portfolio performed and to justify the selection of the preferred portfolio. In the example matrix below, AES Indiana scored six portfolios against quantitative metrics within the following categories: 1) affordability, 2) environmental sustainability, 3) reliability, stability, & resiliency, 4) risk & opportunity, and 5) economic impact. The chart includes quantitative values and color coding to show how each value ranks relative to the others in that category. Where results are similar, utilities must then justify why one portfolio was selected over the other.

Affordability	Environmental Sustainability							Reliability, Stability & Resiliency	Risk & Opportunity							Economic Impact	
	20-yr PVRR	CO ₂ Emissions	SO ₂ Emissions	NO _x Emissions	Water Use	Coal Combustion Products (CCP)	Clean Energy Progress		Environmental Policy Opportunity	Environmental Policy Risk	General Cost Opportunity **Stochastic Analysis**	General Cost Risk **Stochastic Analysis**	Market Exposure	Renewable Capital Cost Opportunity (Low Cost)	Renewable Capital Cost Risk (High Cost)	Generation Employees (+/-)	Property Taxes
	Present Value of Revenue Requirements (\$000,000)	Total portfolio CO ₂ Emissions (mmtons)	Total portfolio SO ₂ Emissions (tons)	Total portfolio NO _x Emissions (tons)	Water Use (mmgal)	CCP (tons)	% Renewable Energy in 2032		Lowest PVRR across policy scenarios (\$000,000)	Highest PVRR across policy scenarios (\$000,000)	P5 [Mean - P5]	P95 [P95 - Mean]	20-year avg sales + purchases (GWh)	Portfolio PVRR w/ low renewable cost (\$000,000)	Portfolio PVRR w/ high renewable cost (\$000,000)	Total change in FTEs associated with generation 2023 - 2042	Total amount of property tax paid from AES IN assets (\$000,000)
1	\$ 9,572	101.9	64,991	45,605	36.7	6,611	45%	7.95	\$ 8,860	\$ 11,259	\$ 9,271	\$ 9,840	5,291	\$ 9,080	\$ 10,157	222	\$ 154
2	\$ 9,330	72.5	13,513	22,146	7.9	1,417	55%	7.95	\$ 8,564	\$ 11,329	\$ 9,030	\$ 9,746	5,222	\$ 8,763	\$ 9,999	99	\$ 193
3	\$ 9,773	88.1	45,544	42,042	26.7	4,813	52%	7.86	\$ 9,288	\$ 11,462	\$ 9,608	\$ 10,237	5,737	\$ 9,244	\$ 10,406	195	\$ 204
4	\$ 9,618	79.5	25,649	24,932	15.0	2,700	48%	7.90	\$ 9,135	\$ 11,392	\$ 9,295	\$ 9,903	5,512	\$ 9,104	\$ 10,249	74	\$ 242
5	\$ 9,711	69.8	25,383	24,881	14.8	2,676	64%	7.57	\$ 9,590	\$ 11,275	\$ 9,447	\$ 10,039	8,088	\$ 9,017	\$ 10,442	55	\$ 256
6	\$ 9,262	76.1	18,622	25,645	10.9	1,970	54%	7.95	\$ 8,517	\$ 11,226	\$ 8,952	\$ 9,629	5,136	\$ 8,730	\$ 9,909	88	\$ 185

Strategies

1. No Early Retirement
2. Pete Conversion to Natural Gas (est. 2025)
3. One Pete Unit Retires in 2026
4. Both Pete Units Retire in 2026 and 2028
5. Clean Energy Strategy – Both Pete Units Retire and replaced with Renewables in 2026 and 2028
6. Encompass Optimization without Predefined Strategy

Figure 1. AES Indiana's 2022 IRP Scorecard Results, sourced from "Best Practices in Integrated Resource Planning"

To capture the recommendations above, RNW suggests adding the underlined language following the draft rule OAR 860-090-0060 (7)(h):

Preferred Portfolio. The utility must select a Preferred Portfolio in the IRP and explain why it represents the best balance of cost and risk to customers and the utility. Where portfolios share similar cost impacts, the utility should consider selecting the portfolio with lower risks. The utility must include a matrix that describes how each portfolio

performed against the portfolio scoring metrics and that clearly demonstrates why the preferred portfolio was selected.

As Oregon moves toward a cleaner grid, it is critical that utilities consider how portfolios perform under a range of future scenarios and select a portfolio that balances cost, risk, and state and federal policies. These additions will promote transparency in portfolio evaluation and preferred portfolio selection, as well as ensure that utilities are appropriately balancing varying priorities.

E. Transparently incorporating HB 2021 compliance into IRP modeling

RNW was encouraged to see that the proposed draft rules include clearer and more robust language around HB 2021 compliance compared to current rules. In particular, the ‘Components of the Integrated Resource Plan’ section requires utilities to demonstrate that all portfolios meet reliability standards, “while complying with all state and federal energy policies, over the next five years and in key planning years.” RNW recommends additional language to ensure comprehensive and transparent integration of HB 2021 compliance into resource planning. Specifically, for utilities subject to HB 2021, the rules should require a clear demonstration of how the emission reduction targets under ORS 469A.410 have been integrated into IRP modeling.

RNW recommends adding new language to the existing language under OAR 860-090-0060 (7)(e) to this effect:

The utility must demonstrate that all portfolios developed under this section provide for an acceptable level of reliability and are expected to meet any reliability requirements to which the utility is subject, while complying with all state and federal energy policies, over the next five years and in key planning years. The utility must describe how the reliability analysis accounts for opportunities presented by regional demand and resource diversity. Utilities subject to ORS 469A.415 must describe how compliance with the emission reduction targets under ORS 469A.410 was incorporated into IRP modeling.

This additional language will ensure that utilities provide sufficient detail on how clean energy compliance is embedded into planning assumptions and decisions. This language should bear on the Commission's decision—if any—to acknowledge or not acknowledge a utility's long-term resource strategy.

II. RFP Feedback

RNW supports many of the proposed changes to the competitive bidding rules, including: independent evaluator (“IE”) selection, the expansion of the IE's scope of work, requiring the IE to report directly to the Commission, the initial and final shortlist selection process, testing

portfolios requested by staff and the IE, and the identification of alternate bids. The draft rules will strengthen the role of the independent evaluator and increase transparency in the bid selection process.

In particular, RNW supports Staff's approach to future IE selection. In UM 2348, Staff and parties contemplated allowing utilities to use independent evaluators from prior RFP cycles as a way to streamline the IE selection process. The proposed draft rules capture this concept in the following provision:

When the IE has completed its services regarding the RFP, the Commission may request feedback from interested parties regarding the IE's performance. The Commission may authorize an electric company to engage the same IE for the electric company's next resource acquisition that is subject to the rules in this Division, and identify the minimum scope of work for which the electric company must engage the same IE.¹²

This approach allows interested parties to weigh in on future IE selection at the conclusion of the current RFP - when the IE's performance is top of mind. The Commission can then consider that feedback and decide whether to retain the IE for the next RFP, removing additional process from the front end of the next RFP. RNW supports this approach because it provides parties with an avenue to voice their concerns or support for the IE, and it also allows the Commission to make a determination at the conclusion of the RFP, rather than waiting until the beginning of the next RFP when there is more urgency to move the process forward.

Our remaining comments seek additional clarity on specific elements of the draft competitive bidding rules, namely, how utilities apply the scoring methodology and how the initial shortlist process will work in practice.

First, according to 860-089-0250(3)(g), the draft RFP must: "[P]rovide for the application of the scoring methodology across all proxy resources that were eligible for selection in the most recently-filed IRP." RNW seeks clarification on this provision, particularly the following language: "provide for the application of." We think this may require revision to clarify the intent and practical effect of the draft rule.

Second, within 860-089-0475 Selection of the Initial Shortlist and Final Shortlist, Staff envisions a 30-day comment period after the utility files an initial shortlist. RNW would like to know whether this 30-day period is additive or whether it fits within the existing timeline. RNW supports the requirement to file an initial shortlist of bids, but would welcome additional stakeholder dialogue to clarify the process and timing of each phase.

¹² AR 669 proposed draft rules 860-089-0200(5)

III. Conclusion

RNW appreciates Staff's work in developing draft rules for IRP requirements and competitive bidding that align with the principles outlined in UM 2348. While we broadly support the proposed draft rules, we believe that incorporating our recommended enhancements to the IRP requirements will strengthen the planning process and lead to improved outcomes. We thank Staff and the Commission for considering our comments and look forward to continued engagement in this docket.

Respectfully submitted this 28th day of May, 2025,

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