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## Renewable NW Biweekly Report: December 7, 2021

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### From the Executive Director ~ Nicole Hughes



Greetings Renewable NW Members ~

I'm excited to share a report prepared by one of our past interns, Dugan Marieb. We had hoped to get this report out to you sooner, but its release was delayed by the pandemic. Please be sure to visit our website to check it out. **Dual-use Solar in the Pacific Northwest: A Way Forward.**

Next Thursday marks our **last member meeting of 2021.** The registration link can be found in the link above and in the calendar invite. We will review the results of our member survey and discuss priorities for 2022. Also on the agenda, Max will share the positive outcomes of our policy work over the past few years. We have much to celebrate at Renewable NW!

The office will be closed the week of December 27 and a few Renewable NW team members will be taking some well deserved days off prior to the holiday. We look forward to reconnecting with you in the new year. The next Biweekly Report will be hitting your inboxes January 11, 2022.

Wishing all our Renewable NW members and

their families the happiest of holidays.

Cheers!

Nicole



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## Policy Update

### **Oregon Executive Order 20-04**

As part of Oregon's implementation of Executive Order 20-04, the Department of Environmental Quality has been undertaking a rulemaking to establish an economy-wide program to reduce greenhouse gas emissions, called the Climate Protection Program. DEQ staff presented the draft rules to the Environmental Quality Commission on [November 18](#), and the EQC is expected to vote on the rules in mid-December.

### **Oregon 100% Clean Energy**

The Oregon Public Utility Commission has released a summary of HB 2021 including an implementation plan, as well as a [Gantt chart](#) showing expected timing of implementation activities. Renewable Northwest staff have had an initial conversation with a consultant who is helping the Commission with implementation. On the legislative front, Renewable NW and partner organizations have struck a preliminary deal with labor representatives regarding amendments to the bill's labor standards next session; when we get a shareable product back from Legislative Counsel, we will circulate it to membership.

### **Oregon RTO Study**

ODOE has kicked off the [SB589 RTO study](#) process and established a stakeholder advisory committee. ODOE is now finalizing their report to the legislature, which they plan to submit by the end of the year. Renewable NW will be commenting on the final report.

### **Oregon Offshore Wind Study**

No update this biweekly report.

### **Oregon Land Use Goals and Barriers to Oregon Siting**

No update this biweekly report.

### **Oregon EFSC**

Renewable NW is drafting a presentation proposal for EFSC staff on an

overview of a renewable energy project's path to completion and the various factors that might delay it or prevent it from being built. This topic is in response to an EFSC staff suggestion. If you have ideas on this topic, or have other feedback on EFSC engagement, please be in touch with [Diane](#). The next EFSC meeting is scheduled for December 16–17. The agenda can be found [here](#).

### **Oregon Department of Fish and Wildlife**

On November 17, the Oregon Court of Appeals [issued an opinion](#) supporting the role of counties as decision-makers for county-jurisdictional renewable projects post-HB 2329 and rejecting a separate approval role for ODFW.

### **Oregon Least-Conflict Siting**

No update this biweekly report.

### **Klamath County Solar Ordinance**

The Klamath County Planning Commission will review public comments received on the proposed solar ordinance and consider how to move forward at a work session in January. The staff report and supplementary materials are posted on the [Klamath County Planning Department webpage](#), for further information. If you have any questions or comments, please contact [Diane](#).

### **LCDC Upcoming Policy Planning Process**

The Land Conservation and Development Commission (LCDC) approved a revised [2021–2023 Policy Agenda](#) at its [November 18–19 meeting](#). The agenda includes Goal 1 revisions to improve community engagement and a Goal 5 Rule Update on Cultural Resources. DLCD's current strategic plan ends in 2022 and will start developing an equity-based strategy for the next eight year period. The next scheduled Commission meeting is February 3–4, 2022.

### **ODOE ORESA Study Process**

No update this biweekly report.

### **Oregon Offshore Wind: BOEM Oregon Intergovernmental Task Force**

No update this biweekly report.

### **Oregon Offshore Wind: DLCD Ocean Policy Advisory Committee Meeting**

DLCD's Ocean Policy Advisory Committee (OPAC) met on November 4. [The meeting is available on YouTube](#). In addition to presentations from BOEM and NREL on OSW in Oregon, DLCD's Federal Consistency Review team gave an overview of their process for reviewing proposed projects in Oregon's

Outer Continental Shelf.

### Washington CESA Project

No update this biweekly report.

### Washington Department of Fish and Wildlife

Renewable NW and a small group of members will meet with WDFW staff on November 29 to discuss best practices for considering wildlife on various site configurations. WDFW staff provided a list of best practices for developers to consider during phases of project construction, maintenance, and operation. Please see the [call notes](#) for more details. A follow-up meeting will be scheduled at the end of the legislative session.

### AgriSolar Clearinghouse

The National Center for Appropriate Technology recently launched the [AgriSolar Clearinghouse](#), a website that compiles research, funding opportunities, and real-world examples of dual use solar, and looks to connect people in the fields of energy and farming. Renewable NW is a partner in the project and will contribute to the website and participate in the [forum](#). The project also includes plans to organize site visits. We encourage Renewable NW members to engage and help advance dual use in the northwest!

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## Regulatory Update

### PacifiCorp 2022 All-Source Request for Proposals

On September 2, PacifiCorp filed a proposed [2022 All-Source RFP](#) the day after filing its IRP. PacifiCorp seeks 745 MW of wind, 600 MW of solar, and 600 MW of storage, all located on the western side of its system and online by 2026. Last week, PacifiCorp [created a website](#) for sharing information on the RFP. On November 22, Renewable NW [filed initial comments](#) on PacifiCorp's proposed scoring methodology. The Washington Utilities and Transportation Commission approved Bates White as Washington IE at its November 12 meeting.

### PacifiCorp 2020 All-Source Request for Proposals

On October 12, the Commission voted to acknowledge PacifiCorp's Final Short List subject to certain additional analysis and information to take place primarily in other dockets; the Commission issued a [written order](#) November 24.

### Portland General Electric 2021 All-Source Request for Proposals

PGE filed its [full RFP](#) on October 15, and Renewable NW [filed comments](#) on November 1; PGE adopted some of our requests in its November 10 [reply comments](#). At a December 2 special public meeting, the Commission largely adopted the recommendations in the [Staff report](#), but directed PGE to remove its PLA requirement instead deferring to HB 2021's labor standards. PGE is expected to issue its RFP to market any time now.

### **Idaho Power 2021 All-Source Requests for Proposals**

No update this biweekly report.

### **PacifiCorp 2021 Integrated Resource Plan**

On September 1, PacifiCorp [filed its 2021 IRP](#). On December 3, Renewable NW filed initial comments on the 2021 IRP at the Oregon PUC highlighting our support for the procurement of large swathes of renewables and storage but also noting concerns related to resource cost assumptions, portfolio modeling related to coal to gas conversion and the Natrium nuclear power plant. The first OPUC commission workshop will be held on January 13, 2022.

### **PacifiCorp 2021 Clean Energy Implementation Plan**

On November 1, PAC filed its [draft 2021 CEIP](#) to the Commission (docket [UE-210829](#)), along with a [Petition for Exemption](#) from WAC 480-100-605. On December 6, Renewable NW submitted comments recommending that the Commission not support the Petition for Exemption, which would exempt PAC from incorporating the social cost of greenhouse gases (SCGHG) into the portfolio modeling which informs its CEIP targets. The petition will be discussed at the Commission's [December 9 Open Meeting](#). PAC must file its final CEIP by January 1, 2022.

### **Portland General Electric 2022 Integrated Resource Plan**

PGE will hold the next IRP roundtable on January 6, 2022 due to the cancellation of the December roundtable.

### **Portland General Electric Green Tariff**

On September 17, PGE [filed a joint application](#) with a large customer to expand its green tariff program by 250 MW specifically to serve that customer. The Commission [held a workshop](#) on October 20 where parties were able to provide initial reactions. On November 3, the application was assigned a unique docket, [UM 2202](#). Renewable NW [submitted brief supportive comments](#) on November 16, and the Commission will take up the petition at its December 14 public meeting.

### **Oregon Distribution System Planning**

Utilities filed their initial distribution system plans on October 15; all are available in the Oregon Commission's [UM 2005 docket](#). Commission Staff have [released a memo](#) outlining additional process, including a December 3 comment opportunity and December 10 workshop. Renewable NW did not file written comments, but will participate in the workshop.

### **Portland General Electric Distribution System Plan**

No update this biweekly report.

### **PacifiCorp Distribution System Plan**

No update this biweekly report.

### **Oregon General Capacity Docket**

On December 6, the Joint Utilities moderated a workshop going over their previously [submitted proposal](#) on providing baseline inputs and data for stakeholders to calculate capacity contributions of resources. Renewable NW collaborated with NIPPC, REC and other stakeholders to file [joint comments](#) supporting Staff's Best Practices, the need for a Commission decision and highlighting concerns with the Joint Utilities' proposal providing only LOLP matrices as a deliverable. Renewable NW and other stakeholders negotiated with Joint Utilities to provide both LOLP and ELCC related analyses and a revised proposal from the utilities is expected shortly.

### **Oregon RA Docket**

On October 27, Staff held a workshop to discuss Staff's straw proposal and the proposal to initiate a phased rulemaking process. Stakeholders including RNW shared their feedback and concerns on Staff's proposed interim and long-term RA solution framework and expressed support for the informational filing piece, the starting point of the process. Renewable NW [submitted comments](#) supporting Staff's proposal and provided additional context on the recent developments in the Western Resource Adequacy Program. A staff memo highlighting areas of consensus and divergence would be distributed prior to the December 14 public input meeting at the Oregon PUC.

### **Oregon RPS Dockets**

No update this biweekly report.

### **Puget Sound Energy 2021 Integrated Resource Plan**

No update this biweekly report.

### **Puget Sound Energy 2021 All-Source Request for Proposals**

Renewable NW, NWECA and Rye Development [filed joint comments](#) on PSE's methodology to calculate ELCC values for both short- and long-duration storage resources, including how the company treats market availability in modeling. [On the recommendations of consultant E3](#). PSE's responses include commitments to 1) run an additional sensitivity of a GENESYS model run assuming regional capacity additions such that the region meets a 5% LOLP standard, before conducting the portfolio analysis in the RFP; 2) run resource-specific ELCCs for Phase 2 of the RFP and update its generic resource assumptions for the 2023 IRP progress report; and 3) use a climate change update for Phase 2 of the RFP and the 2023 IRP progress report, building on the climate change data used in the Northwest Power and Conservation Council's recent resource adequacy work.

### **Puget Sound Energy 2021 Clean Energy Implementation Plan**

On November 12, Renewable NW submitted feedback on PSE's draft 2021 CEIP, recommending that the company 1) revise the resource cost inputs to its portfolio model to incorporate data from the latest NREL ATB, 2) clarify how PSE determined which grid modernization investments are directly attributable to compliance with CETA and thus relevant to the incremental cost of compliance, and 3) elucidate how PSE is planning across this CEIP period for its 2026 capacity need. PSE must file its final 2021 CEIP with the Commission by December 17.

### **Avista 2021 Clean Energy Implementation Plan**

No update this biweekly report.

### **Avista 2022 All-Source Request for Proposals**

On November 1, Avista filed its draft 2022 All-Source RFP with the Commission (docket [UE-210832](#)). This RFP seeks to fill the need for ~50 aMW of qualifying clean energy beginning in 2025 and increasing to ~100 aMW by 2028. Avista also seeks ~275 MW of winter capacity and 160 MW of summer capacity by 2030 for reliability. Avista may bid repowering resources and/or Avista self-builds into the RFP. The proposed RFP schedule allows for public comments by December 15. Please reach out to [Katie](#) with feedback on the draft RFP.

### **WA L&I Clean Energy Labor Standards**

No update this biweekly report.

### **WA CETA Rulemaking**

On December 6, the [UTC](#) and [Commerce](#) held a joint workshop to discuss

the [draft rules on “use”](#), which propose a framework for utilities’ demonstration of compliance with CETA. Renewable NW [submitted comments](#) on the draft rules and outlined a position during the workshop which supports the proposed compliance framework with improved clarity around certain components. Also on December 6, [Renewable NW submitted comments](#) on the draft rules on the double counting of non–power attributes and the treatment of energy storage, advocating for strong protections against double counting and for a revisiting of the rule on energy storage in the future to review the sensibility of excluding storage charging from retail electric load if emissions attributes associated with this charging can be used for primary compliance with CETA. Another joint workshop will be held December 14 to discuss these rules. On December 3, Renewable NW emailed the distribution list about a detail of the double counting rules for which members may have feedback; please respond to that email by December 12 to provide input in advance of the workshop.

### **WA CETA Transmission Corridors Work Group**

As mandated by Section 25 of CETA, WA EFSEC has assembled a 20–member work group to review the need for upgraded and new transmission and distribution facilities, to identify areas where facilities may need to be enhanced or constructed, and to identify environmental review options that may be required to designate corridors and may be suited for expedited review without compromising environmental protection. The third work group meeting will be split between December 8 and 9, and the agenda will likely include 1) specific opportunities to upgrade existing transmission and 2) areas with strong wind (incl. offshore) or solar resources currently without options for interconnection. Please reach out to [Katie](#), if you have feedback regarding these topics to help inform our participation in the work group.

### **Idaho Power 2021 Integrated Resource Plan**

Idaho Power hosted an IRPAC call on November 18 to discuss [portfolio modeling results](#) coming out of AURORA for the 2021 IRP. The [preliminary preferred portfolio](#) includes 500 MW B2H transmission, 700 MW of wind, almost 1000 MW of solar and 285 MW of battery storage resources in the action plan window (2022–2028). Idaho Power also informed stakeholders that the 120 MW Jackpot Solar Project may be scrapped and the Company plans to fill that 45 MW capacity with an additional RFP. More information on this would be available soon.

### **NorthWestern Energy Electricity Supply Resource Procurement Plan**

NorthWestern held a Technical Advisory Committee meeting on October 19 covering price forecasting and capacity contribution values; [materials are](#)



[available here](#). The company is also taking steps to make their resource planning process more open and transparent, having updated their [resource planning website](#) to include Technical Advisory Committee meeting details and an [email list signup](#), in addition to making Committee materials easily available to the public. The planned December 14 Committee meeting has been canceled and the next meeting will take place in February 2022.

### Avista Queue Reform

No update this biweekly report.

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## Markets & Transmission Update

### Renewable NW M&T Call

Renewable NW will hold monthly calls on the second Thursday of every month to discuss markets and transmission updates. For the December 9 meeting, guest speakers Larry Holdren and Roby Roberts will update us on the work of Western Freedom. Please contact [Pam](#) if you would like to be added to the Markets & Transmission distribution list.

### Regional Market Principles and Strategies

No updates this biweekly.

### BPA Transmission Rate Case

No update this biweekly report.

### BPA EIM Implementation

No updates this biweekly.

### BPA Clark Public Utilities Request

Clark Public Utilities [requested partial discontinuance](#) of River Road Gas Plant as a dedicated resource in order to comply with CETA. Under the Northwest Power Pool, the BPA administrator can grant such a request without any additional process. If BPA grants the request, it expects that market purchases would be needed to replace the discontinued resource. It also assumes there will be additional transmission congestion issues in the Portland and Vancouver areas if the plant were no longer serving CPU's load. Under CPU's proposal, it would retain the full capacity commitment for River Road for participation in the NWPP's WRAP. CPU's slides can be found [here](#), and BPA's slides are [here](#). BPA has opened a [comment period that ends December 15](#).

### Southwest Power Pool's Markets+

SPP held its first workshop on its proposed extended day-ahead market, called Markets+, on November 17. Slides from that workshop can be [found here](#). A second webinar was held on December 1, and in-person meetings are planned for February, March, and June. A survey was recently sent out to gauge interest in Markets+, with comments **due by December 17**. Anyone interested in finding out more information and receiving a link to the workshops can [sign up here](#).

### **EDAM Straw Proposal**

A recording of CAISO's EDAM Forum on November 12 can be [found here](#). Comments on the November 12 workshop are due by December 8. Anyone interested can sign up for [one of three working groups here](#) (Supply Commitment and Resource Sufficiency Evaluation; Transmission Commitment and Congestion Rent Allocation; GHG Accounting and Costs). CAISO hopes for the working groups to be finished by the end of February 2022, culminating in a comprehensive straw proposal by the end of March. The planned go-live implementation for EDAM is the end of 2023.

### **Western Resource Adequacy Program**

The NWPP's Western Resource Adequacy Program is currently in Phase 3A, with 26 participants. A public stakeholder meeting was held November 17, and the recording can be found [here](#). The WRAP plans to have its first non-binding compliance showing for Winter 2022–2023 on May 15, 2021. NWPP plans to host an additional Transmission-focused webinar to discuss showing requirements and a second Transmission hub. Renewable NW has compiled a list for the PIO sector, which will need to organize and nominate names for the WRAP Nominating Committee and the Program Review Committee by the end of December. Renewable NW and other stakeholders will meet with WRAP staff on December 17 to discuss transmission & deliverability related issues we commented on previously.

### **Northwest Power and Conservation Council 2021 Plan**

The Power Council released its draft 2021 Northwest Power Plan for public review and comment, which is due by November 19. [The draft plan can be found here](#). Renewable NW submitted detailed comments on the draft plan supporting staff's considerable modeling effort, renewable buildout coming out of the plan but also highlighting areas of improvement in modeling short and long-duration energy storage resources. Stakeholder comments will be posted on [this link](#) soon.

### **FERC**

- **PGE Transmission Rate Case:** PGE filed its first [transmission rate case](#) at FERC on October 25, which is its first transmission rate case in 20

years. As part of its filing, PGE plans to make its Colstrip rate (currently \$1.013/kW–mo) part of its network integrated transmission service, so there will not be a separate PGE charge for use of Colstrip (access to BPA segments would still need to be acquired separately). PGE states this change is a long-term strategy to diversify resources in Montana. PGE is proposing to increase its PTP rate from \$0.5231/kW–mo to \$1.2722/kW–mo, and to increase its Network Integration Services rate from the customer’s Load Share Ratio multiplied by \$1,670,865 to the customer’s Load Share Ratio multiplied by \$7,620,015. Renewable NW filed for intervention and submitted comments, which can be [found here](#). PGE’s response to the submitted comments can be [found here](#).

- **Building for the Future through Electric Regional Transmission Planning and Cost Allocation and Generation Interconnection:** On July 16, FERC issued an [Advanced Notice of Proposed Rulemaking](#) seeking comments on transmission planning, including the topics of generation interconnection and cost allocation. Comments, including the reply comments that were due on November 30, can be found by searching FERC’s document library for Docket RM21–17. FERC is holding a [technical conference](#) on ANOPR issues on November 15.
- **FERC–NARUC Joint Task Force:** No update this biweekly report.

#### WECC Resource Adequacy Workgroup

No update this biweekly report.

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**The Biweekly Report is for Renewable Northwest members only.  
Please do not forward. Thank you.**

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#### Upcoming Events

December 7 & 8 ~ [CleanPower 2021](#)

December 10 ~ [Lunch & Learn on Native perspectives on the connection of energy infrastructure and climate justice](#). *This panel discussion will touch upon the nexus of energy, water and land rights, wellbeing, cultural connections, food systems and Tribal Sovereignty.*

December 15 ~ [SEER Webinar Series](#) (2 of 4): Effects of Offshore Wind Farm Structures on Fish Ecology & Benthic Disturbance

December 16 ~ [Renewable NW Q4 Member Meeting \(10am – 12pm PST\)](#)

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#### Renewable NW Member Announcements

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Please contact [Pam Mahon](#) to submit job opportunities, events, or other items.

*Questions regarding member announcements should be directed to the member company, Renewable NW does not assume responsibility for the information provided in member announcements.*

**Renewable Northwest**  
**421 SW 6th Ave, Suite 1400**  
Portland, OR 97204-1625  
503.223.4544

Contact Us

