

Stakeholder Update

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Welcome!

Thank you to those who submitted possible names for this quarterly publication. We received numerous creative ideas to select from. The winning choice — “Staying Connected” — represents all utilities regulated by the PUC, and most importantly, our efforts to keep stakeholders and the public informed of our work.

If you know someone who might be interested in receiving this publication, have them email a request to kandi.young@puc.oregon.gov.

What’s happening in the Western electricity markets?

By Kacia Brockman, PUC Commission Advisor

Organized electricity markets are the topic of much discussion and planning activity across the Western states. In an organized electricity market, utilities and generators pool their loads and resources across a broad geographic area. The market operator determines which resources to dispatch to serve load across the entire market footprint at the least cost. A larger market footprint gives a utility access to a broader array of diverse resources and loads. This increased diversity can support the clean energy transition by improving reliability, reducing renewable energy curtailment, and reducing customer cost. These benefits are recognized by the Oregon legislature in HB 2021 (2021), which calls for implementation of the 100% clean electricity requirement by 2040 in a manner that supports utility participation in electricity markets. The PUC’s [SB 978 report](#) (2018) identified promoting regional market development as an activity it would pursue to lower costs and risks to customers through efficient wholesale competition and regional resource diversity.



Today, Oregon’s three investor-owned utilities – Portland General Electric, Pacific Power, and Idaho Power – plus Bonneville Power Administration (BPA) participate in the Western Energy Imbalance Market (WEIM), a real-time energy-only market operated by the California Independent System Operator (CAISO) across the West. WEIM participation has saved Oregon ratepayers [significant costs](#) by providing access to least-cost energy. More substantial cost savings and reliability benefits are expected when the utilities join a day-ahead market, in which nearly all of the utilities’ load will be served by the market operator’s optimization. Reliability is protected because every participating utility has to contribute enough generation to cover their own load – even if that generation is displaced by lower-cost resources in the end.

CAISO is in the process of extending its day-ahead market beyond California to a West-wide footprint. CAISO expects to file its [tariff](#) for its Extended Day-Ahead Market ([EDAM](#)) at the Federal Energy Regulatory Commission (FERC) in August. PacifiCorp has [announced](#) its intent to join EDAM, and presented its [economic analysis](#) of EDAM at the PUC’s May 2 public meeting. At the same time, Southwest Power Pool (SPP), which operates a regional electricity market in the Midwest, is developing a separate Western market option ([Markets+](#)) that would not include California. SPP is presently engaged in intensive market design efforts and expects to file its Markets+ tariff at FERC in early 2024. BPA is beginning a [public process](#) in July to evaluate its potential participation in one of these day-ahead markets.

The PUC is participating extensively in development activities for both of these regional day-ahead markets and is coordinating closely with the Oregon Department of Environmental Quality on emissions tracking issues. Commissioner Tawney serves on the Body of State Regulators and Governance Review Committee for the WEIM, and also on the Markets+ States Committee and two Markets+ task forces. Additionally, Oregon commissioners have [joined other Western state regulators to initiate new efforts](#) to create a governance structure that enables a West-wide market footprint in order to best maximize customer benefits and advance state policy. If you have questions, you can reach out to [Kacia Brockman](#), Commission Advisor at the PUC.

Wildfire Mitigation Plans for Oregon’s largest electric utilities approved

The Oregon Public Utility Commission (PUC) recently approved the wildfire mitigation plans (WMPs) for Idaho Power, PacifiCorp, and Portland General Electric (PGE). The 2023 WMPs reflect the continued changes in the wildfire mitigation landscape and are the second to be filed since Senate Bill 762 passed during the 2021 legislative session.

Senate Bill 762 and Oregon administrative rules established formal standards for electric utility wildfire mitigation plans, including the information utilities are required to include in their plans. Plans must include identification of high-risk areas within the utility’s service territory and actions to minimize those risks, as well as protocols for implementing public safety power shutoffs (PSPS). Utilities also need to describe how they determined which risk reduction strategies to pursue.

“Although some of Oregon’s regulated utilities have been developing wildfire mitigation plans for years and reporting to the PUC informally, this is only the second formal filing to the Oregon PUC,” said Megan Decker, PUC Chair. “We recognize the progress Oregon utilities have made from the first plans filed last year and look forward to the continued evolution of these plans.”

Idaho Power, PacifiCorp, and PGE all filed their 2023 WMPs prior to December 30, 2022, as required by the bill and regulations. PUC staff and an independent evaluator reviewed each plan to ensure they met the statutory requirements and to make recommendations to continue evolving the plans to further address future risk. A series of meetings were held to evaluate key topics, including asset health, risk mitigation, vegetation management, system hardening, situational awareness, community engagement, and public safety protocols, among others. From these discussions and numerous requests to the utilities for additional information, PUC staff developed a list of additional recommendations to be considered for the 2024 WMPs.

“The 2023 Wildfire Mitigation Plans show how the utilities are continuing to reduce the risk of ignitions,” added Letha Tawney, PUC Commissioner. “The in-depth review of the plans also demonstrates how utilities in Oregon – like utilities across the West – must continue adapting to the changing landscape to keep communities safe.”

Idaho Power, PacifiCorp, and PGE’s plans met the requirements, leading to an approval by all three Commissioners of their WMPs and instruction to work with the PUC to address the recommendations made by the PUC in their 2024 plans. Each utility was instructed to provide a report describing their efforts to address each PUC recommendation in their 2024 WMP filing.

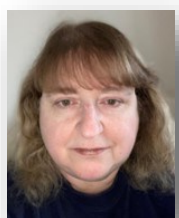
The 2023 Wildfire Mitigation Plans for [Idaho Power](#), [PacifiCorp](#), and [PGE](#) are available online for review. [WMPs for all other Oregon electric utilities](#) are currently available online; for those plans there is no specific timeline required for updates, but as they are updated, they are required to be filed with the PUC within 30 days of their governing boards’ approval for the PUC to post online.



View of a wildfire during the Labor Day Fires of 2020

PUC Administrator Recognized

Heide Caswell, the PUC’s Utility Safety, Reliability and Security Division Administrator, is the recent recipient of the 2023 Power & Energy Society Award for Excellence in Power Distribution Engineering from the Institute of Electrical and Electronics Engineers. The award was created to recognize innovative contributions to distribution reliability analysis, standards development, and energy distribution cost optimization.



Heide currently serves as Vice Chair of the Distribution Reliability Working Group, a member of the North American Electric Reliability Corporation’s Performance Analysis Subcommittee, and as Chair of the Distribution Reliability Work Group’s Data Analysis Task Force.

Q3 2023 Utility Planning & Procurement Activities

By Kim Herb, PUC Staff

Staying on top of a single investor-owned utility planning or procurement docket can be challenging even for a seasoned stakeholder. This challenge is compounded by meaningful shifts in how utilities plan and meet system needs while meeting state energy policies. To further that challenge, the Oregon Public Utility Commission (PUC) currently has four open Integrated Resource Plan dockets and three request for proposal dockets. While each of these dockets has schedules posted on [eDockets](#), in an effort to support engagement, the PUC has assembled a list of some of the milestones and community engagement deadlines through September 2023. [The dates listed are subject to change — stay current with the schedule tab in eDockets.](#)

Integrated Resource Plans (IRPs)

LC 80 – PGE’s 2023 IRP and Clean Energy Plan (CEP)

- July 20, 2023 - Staff and Stakeholder Round 1 Comments Filed
- August 30, 2023 - PGE Utility Reply Comments Filed
- September 7, 2023 - Commissioner Workshop

LC 81 – Avista’s 2023 IRP

- August 29, 2023 - Staff and Stakeholder Comments Filed
- September 26, 2023 - Avista Reply Comments Filed

LC 82 – PacifiCorp’s 2023 IRP and Clean Energy Plan (CEP)

- July 31, 2023 - PacifiCorp Reply to Round 0 Comments (filed on June 30)
- August 10, 2023 - PacifiCorp Post Round 0 Presentation

LC 83 – Cascade Natural Gas 2023 IRP

- July 25, 2023 (tentative) – Cascade Presentation of its 2023 IRP
- September 28, 2023 (tentative) – Staff and stakeholder opening comments due

Requests for Proposals (RFPs)

UM 2193 – PacifiCorp’s 2023 RFPs

- August 9, 2023 – Oregon Independent Evaluator (IE) files status report on bid scoring and sensitivity analysis
- August 9, 2023 – PacifiCorp files its Final Short List (FSL), sensitivities, additional data, and all workpapers
- August 23, 2023 – Oregon IE files Closing Report on the FSL
- August 24, 2023 – PacifiCorp files the FSL with the Commission requesting acknowledgement
- September 14, 2023 – All parties file comments on the FSL
- September 28, 2023 – PacifiCorp files reply comments

UM 2274 – PGE’s 2023 RFPs

- July 6, 2023 – Commissioner Workshop
- July 14, 2023 – Independent Evaluator (IE) Files Secondary Report
- July 15, 2023 – PGE files Planning and Procurement Forecast
- July 24, 2023 – Staff files Staff Report on RFP
- August 1, 2023 – All interested parties reply to Staff Report
- August 8, 2023 – Public Meeting to decide on approval or disapproval of the Draft RFP

UM 2255 – Idaho Power’s 2026 All-Source RFPs

No milestone or engagement opportunities in Q3 2023. Benchmark bids were filed with the PUC on June 13, 2023. IPC and the IE are currently reviewing market bids.

All upcoming public meetings and special public meetings, as well as recordings of past meetings, [can be found on the PUC website.](#)

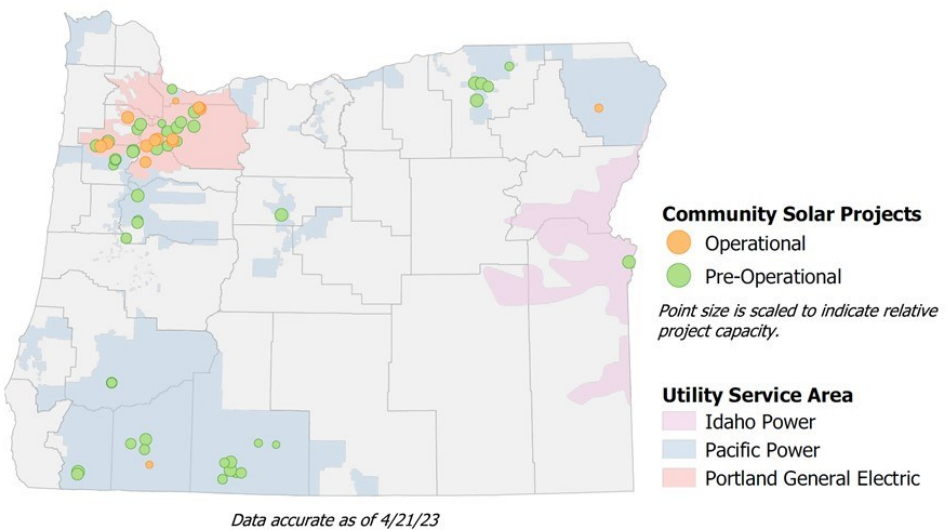
Oregon Community Solar Program Update

By Joseph Abraham, PUC Staff

Oregon’s Community Solar Program (CSP) was established by the Oregon Legislature in 2016 through Senate Bill 1547 and launched by the Oregon Public Utility Commission in 2020. With an overarching objective to establish equitable access to solar generation and incentives, the program allows low and moderate-income residents, small businesses, and other customers of the State’s three investor-owned electric utilities to subscribe to privately developed CSP projects connected to the grid. The program ensures its participants receive credits on their utility bills for their subscribed portion of the energy generated, with low-income participants receiving guaranteed bill savings of ten to twenty-five percent.

The program’s design emphasizes community-led projects and equitable access. 40 megawatts (MW)—or twenty-five percent of the program’s total capacity—is reserved for projects that are small, community led, or provide additional community benefits. To help meet the requirement that 10 percent of every project in the program must be subscribed to by low-income residents, over 1,800 low-income households have already been referred to projects in development by the CSP Administrator. To date, low-income households participating in the program have saved over \$50,000 and are expected to save more than \$600,000 annually once the entire 160 MW of program capacity is developed as energized projects.

The program has begun to ramp up as planned after projects experienced delays due to the global pandemic. As of May 2023, 16 fully subscribed projects representing 27.5 MW of generation have been energized. An additional 46 projects representing 86.5 MW are expected to become fully subscribed and energized later in 2023 and in 2024. The program will generate enough solar energy to power more than 23,000 homes per year when the full 160 MW of capacity is developed. Interested customers of Portland General Electric, Pacific Power, and Idaho Power can visit [Oregoncsp.org](https://oregoncsp.org) to learn more about how to participate in Oregon’s Community Solar Program.



First ever Clean Energy Plans filed

Both PacifiCorp and Portland General Electric (PGE) have filed their first Clean Energy Plans (CEPs) as required by Oregon Revised Statute [469A.415](#) to help meet Oregon’s clean energy targets by reducing greenhouse gas emissions. Idaho Power is exempt from filing a CEP as they serve fewer than 25,000 customers in Oregon as noted in ORS 757.600.



View the CEPs for [PacifiCorp](#) and [PGE](#) for additional information.

Investigation to expand OTAP

House Bill 4092 (2022) directed the PUC to investigate expanding the Oregon Telephone Assistance Program (OTAP), the state’s counterpart to the federal Lifeline program, to promote access to broadband internet access service (BIAS), as well as barriers faced by low-income Oregonians to obtaining access to BIAS. The PUC collaborated with an outside consultant who reported the following findings.



- ◆ Data from the FCC indicates that Oregon has high levels of BIAS availability and adoption in the U.S. BIAS is available to 98.99% of Oregon’s population, but only adopted by 92.55% of those to whom it is available. There appears to be a strong correlation between customer adoption rates and household income levels. Lower income households are less likely to subscribe to BIAS, demonstrating the need for additional support. The OTAP support level of \$10 each month may be inadequate given the low subscription rate among low-income households.
- ◆ The current federal and state legal framework in which providers must be designated as an Eligible Telecommunications Carrier (ETC) and Eligible Telecommunications Provider (ETP) in order to offer federal Lifeline and OTAP support, respectively, to customers, is a barrier to increasing the subscription rate for low-income households. ETC is a prerequisite to seek reimbursement for federal Lifeline benefits provided to eligible households. Neither the Oregon legislature nor the PUC can eliminate the federal ETC requirements. Additionally, a majority of Oregonians subscribe to BIAS from providers that do not participate in OTAP.
- ◆ Depending on the technology used to deliver BIAS, the cost of customer premises equipment is relatively inexpensive and available from the provider at reasonable monthly rental rates. However, the network interface hardware for satellite-based BIAS is an affordability barrier for low-income residents with no alternative to satellite. Depending on the service tier selected, the cost of equipment ranges from \$600 to \$2,500. Oregon laws governing the OTAP do not currently allow for support of customer premises equipment.

Under the existing regulatory framework, options to expand or increase the OTAP are limited. The PUC could adjust the OTAP support amount to provide increased monthly support levels to promote customer participation, the main challenge lies with provider participation. Major providers such as Comcast and Verizon Wireless do not participate. To receive available federal or state high-cost support, generally in rural areas, a facilities-based provider must be designated as a federal or state eligible telecommunications carrier. As a condition of receiving high-cost support, providers must offer federal Lifeline benefits and request eligible telecommunications provider designation for participation in the OTAP. However, the condition to offer federal Lifeline and OTAP benefits is limited to areas where high-cost support is available. In other words, some providers, such as AT&T Mobility, Charter, Viasat, and others, do not offer federal Lifeline or OTAP support throughout a significant portion of their service footprint. Otherwise, the provider must petition for ETC and ETP designation for the limited purpose of offering federal Lifeline and OTAP support in their remaining service territory. Program manager, Jon Cray, stated, “Customer participation would substantially increase if certain providers offered federal and OTAP benefits throughout their service territory. Nevertheless, Staff is working with DOJ to explore possible legal remedies available to the PUC.”

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In the meantime, the Oregon Legislature has the option of exploring alternatives that modify the construct of the OTAP. Laws could be amended to allow the OTAP benefits to support the purchase of customer premises equipment, provided the changes do not duplicate support from other similar programs. In addition, the Oregon Legislature could allocate funds for the development of a training program designed to narrow the gap in missed opportunities for acquiring the necessary skills to effectively navigate and use the internet for education, employment, telehealth, etc.

[View the full report for additional information.](#)

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If you're not following our social media accounts, we encourage you to do so. This will help us provide information to the public and interested parties as our important work continues to gain interest.

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Like us on Facebook @OregonPUC

We also have a presence on LinkedIn where we promote job opportunities at the PUC, trainings we offer, and more. Help us get the word out by following our page and sharing our posts to help increase our reach.



DEI: The Objective is Perspective

By Ezell Watson III, Diversity, Equity & Inclusion Director

In today's world, it is more important than ever to be able to hold multiple perspectives. With so much information available to us, it can be easy to get caught in our own echo chambers, only hearing viewpoints that confirm our own beliefs. However, by taking the time to consider other perspectives, we can gain a more well-rounded understanding of the world around us.

There are many benefits to holding multiple perspectives. First, it can help us to be more empathetic. When we can see things from another person's point of view, we are better able to understand their motivations and feelings. This can lead to more compassionate and understanding relationships.



Second, holding multiple perspectives can help us to make better decisions. When we only consider our own perspective, we may not be able to see all of the potential consequences of our actions. By considering other perspectives, we can get a better idea of the possible outcomes of our decisions and make choices that are more likely to be successful.

Third, holding multiple perspectives can help us to be more creative. When we are open to new ideas and different ways of thinking, we are more likely to come up with innovative solutions to problems. This can be especially helpful in the workplace, where being able to think outside the box can be a valuable asset.

In conclusion, there are many reasons why it is important to hold multiple perspectives. By doing so, we can become more empathetic, make better decisions, and be more creative. In a world that is increasingly complex and interconnected, holding multiple perspectives is essential for success.

Here are some additional examples of how holding multiple perspectives can be beneficial:

- In a business setting, being able to understand the perspectives of customers, employees, and shareholders can help you to make better decisions that will benefit everyone involved.
- In a political setting, being able to understand the perspectives of people from different backgrounds can help you to find common ground and build consensus.
- In a personal setting, being able to understand the perspectives of your loved ones can help you to strengthen your relationships and resolve conflicts.

No matter what your circumstances, holding multiple perspectives can help you to be a more well-rounded and successful individual. So next time you're faced with a challenge, take a step back and try to see things from a different angle. You may be surprised at what you learn.

Know what's below. Call 811 before you dig.

