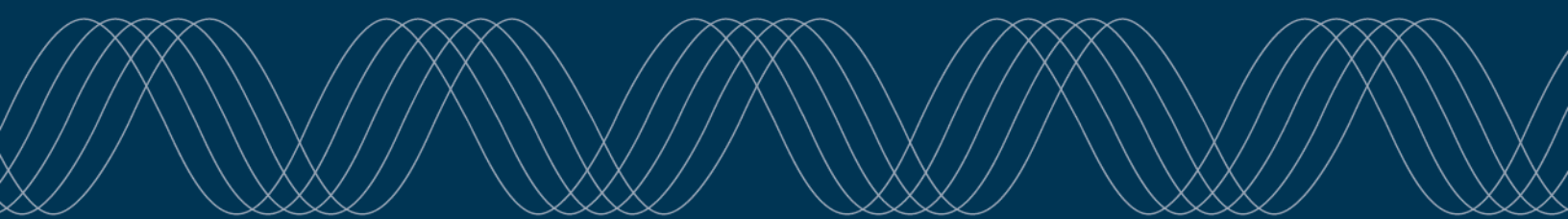


Appendix L

Benchmark Bid Elements



2025 All-Source RFP

Issued July 31, 2025



PGE's 2025 All-Source RFP Benchmark Bid Elements

Utility Elements Made Available to Bidders

Certain assets controlled by the utility will be used to support Benchmark Bids, which are summarized in Exhibit A to this Appendix. In compliance with Oregon Competitive Bidding Rules, PGE has conducted analysis of these assets to determine their availability to third parties for use in developing bids.

To facilitate finding the broadest and most diverse suite of resources for customers, PGE is making available certain Benchmark Bid elements to all bidders as part of the 2025 RFP. PGE has significantly broadened the resources it is making available to third-party bidders as part of this RFP process. In doing so, PGE is attempting to be responsive to feedback from the Commission and stakeholders. The following elements are made available for use by 2025 RFP Bidders:

- Long-Term Firm Transmission rights originating at BIGLOW, BPAT.NWMT, CNTRLFRY230, or UMATILLA.PGE and terminating at BPAT.PGE, when facilities generate below nameplate capacity. These locations are identified as acceptable Points of Receipt (PORs) in PGE's RFP subject to the amounts and terms and conditions described in Appendix A, Scoring and Modeling Methodology.
 - These rights are being made available to all ownership and contract types.
- Long-Term Firm Transmission Rights originating at Colstrip and terminating at BPAT.NWMT, of up to 300 MW. Use of these rights is only available when existing Clearwater facility generates below nameplate capacity.
 - These rights are being made available to all ownership and contract types.
- Conditional Firm Transmission Rights originating at UMATILLA and terminating at BPAT.PGE, of up to 160 MW.
 - These rights are being made available to all ownership and contract types.
 - Due to current resource adequacy contracts using these rights, PGE will derate energy and capacity benefits for any expected deliveries prior to the contract term, no earlier than December 31, 2029. Bidders may propose long-term redirects of these rights following contract conclusion.
- PGE's Large-Generator Interconnection Agreements for Biglow Canyon Wind Farm, Tucannon Wind Farm, and Wheatridge Wind Farm.
 - Use of these Interconnection Agreements are being made available to only utility-owned bids due to the operational considerations described below.
 - Use of these Interconnection Agreements is limited to times in which existing facilities generate below nameplate capacity.

- PGE's Large-Generator Interconnection Agreement at Evergreen Substation, in the amount of up to 125 MW.
 - Use of these Interconnection Agreements are being made available to only utility-owned bids due to the operational considerations described below.
- Land in Northeast Oregon owned by the utility in support of a solar resource.
 - Approximately 300-600 acres located at the following coordinates: 45.696, - 119.797
 - This property is contiguous with current PGE operations.
 - In connection with utility owned commercial structures proposed on this property, the utility assets will also include generation capacity on the generation-lead line from the Grasslands substation to BPA's Slatt substation (but does not include any transmission from the BPA Slatt substation to PGE Load).
 - Due to security risks associated with co-location, PGE will only be making this property available to third-party developers under a utility owned commercial structure as to avoid unacceptable risks associated with multiple entity operation within the site perimeter.

Requests for Additional Information

In addition to the information made available in this appendix, PGE may also make available additional information. PGE will provide information to entities preparing a bid subject to the execution of NDAs and confirmation that the information does not include critical infrastructure security concerns. The process to request this additional data is included in page 8 of PGE's RFP main document. This information may include:

- Meteorological data
- Site assessments
- Existing utility interconnection agreements
- Existing utility transmission agreements
- Permitting data

Summary of Analysis

Security Analysis of Land

The Northeast Oregon property identified above is in rural Morrow County, Oregon and is remote. Emergency services are provided by the Morrow County Sheriff, which covers a large

geographic area. The property is contiguous with current PGE operations, and it is infeasible to manage multi-entity operations within this site, given needs for roving patrols, secured entry onto the property, detection and monitoring (such as thermal cameras and fence detection), and established coordination between PGE security and local law enforcement.

Operational Analysis of Availability of Transmission Rights

PGE has made available four delivery points which allow for third-party bids to use PGE's transmission rights originating at BIGLOW, BPAT.NWMT, CNTRLFRY230, or UMATILLA.PGE and terminating at BPAT.PGE. Details related to use of these rights will be considered on a case-by-case basis, as complexities regarding commercial arrangements, transmission tagging, operational coordination and other factors introduce complexities. This structure can be extended to allow third-party use of PGE's rights over NWMT from Colstrip to BPAT.NWMT. Bidders proposing use of these rights should note that use of the 300 MW amount may exceed PGE's transmission rights from BPAT.NWMT to BPAT.PGE, with possible implications for minimum transmission requirements and non-firm transmission dependence.

PGE's conditional-firm transmission rights from UMATILLA to BPAT.PGE are associated with an existing resource adequacy contract through no earlier than the end of 2029. PGE's analysis did not identify barriers to use of these rights by a third-party after the conclusion of the existing contract. Partial use of the rights within the contract term may be possible for projects with earlier CODs; however, rights cannot be transferred or redirected prior to the contract conclusion. PGE will apply adjustments to energy and capacity scoring to any project with COD prior to the end of the existing contract term.

Operational Analysis of Availability of Large Generator Interconnection Agreements

The Biglow, Tucannon and Wheatridge interconnections are used by existing wind facilities, and use by new bids would be secondary to the existing generators when existing facilities generate below nameplate capacity. Under this paradigm, a supplemental agreement cannot be established allowing operations of the new resource to be managed independently of the existing resource. For this reason, PGE is limiting availability to only utility-owned bids.

PGE's decision to make use of these Interconnection Agreements available to utility ownership projects (including third-party BTA proposals) is made in consideration of the following factors:

- These interconnection agreements are contracts between PGE and the applicable transmission provider. Under these contracts, PGE is solely responsible for complying with all provisions of the agreement. If new utility-owned generation equipment is added under an existing interconnection agreement, it is feasible for PGE power

operations to co-optimize schedules of the resources in accordance with the interconnection agreement.

- Third-party ownership of a project behind a PGE held interconnection does not relieve PGE of its operational responsibility and obligations under the interconnection agreement. Third-party operations would introduce significant commercial and operational issues regarding interconnection contract performance, penalties and liability concerns associated with third-party operators exercising a right to generate power under the interconnection agreement. Because such concerns are readily addressed through third-party application for interconnection service, for which all market participants have equal access, PGE declines to make interconnection agreements for third-party owners.

Therefore, when balancing the need to secure a diverse and broad set of resources possible in this solicitation with the need to address commercial and operational limitations associated with broader access, PGE is attempting to strike the correct balance of these competing interests by allowing access by bidders proposing utility ownership, particularly considering the wide variety of other rights PGE is making other rights available to all bidders.

Exhibit A. Information Provided by PGE Benchmark Team

At request of OPUC Staff, PGE is providing the following information consistent with Order 24-011. This information was provided as by PGE's Benchmark Team directly to the Independent Evaluator, who coordinated transfer of this information to the RFP Team. The following bid descriptions are provided below without modification.

Bid Descriptions from the PGE Benchmark Team

PGE intends to submit benchmark resources into the 2025 RFP to meet both PGE's renewable needs and non-emitting capacity needs. Benchmark bids include wind, solar, hybrid and stand-alone energy storage resources. The PGE Benchmark Team provides the following table to enumerate PGE's potential benchmark bids:

| State | Technology | Structure | Nameplate Capacity (MW) ¹ | GIA Status |
|------------|-----------------|-------------|--------------------------------------|-----------------------------|
| Oregon | Solar/BESS | BTA/PPA/SCA | 365 | Study |
| Oregon | Solar/BESS | BTA | 250 | Study |
| Montana | Solar/BESS | BTA/PPA/SCA | 440 | Study |
| Oregon | Solar/BESS | EPC | 305 | Study |
| Oregon | Solar/BESS | BTA/PPA/SCA | 800 | Study |
| Oregon | Solar/BESS | BTA | 250 | Study |
| Oregon | BESS | BTA | 400 | Study |
| Oregon | BESS | BTA | 100 | IA Executed |
| Oregon | BESS | BTA | 200 | Study |
| Oregon | BESS | BTA | 22.5 | IA Executed |
| Washington | Wind/Solar/BESS | BTA/PPA/SCA | 1,200 | Study Completed |
| Washington | Solar/BESS | BTA | 394 | Pending Status ² |
| Oregon | BESS | BTA | 100 | Study |
| Oregon | BESS | BTA/SCA | 400 | Study |

All utility-owned solar offers will be bid under BTA or EPC structures. As noted within the 2025 RFP, those bids may be transferred to PGE's affiliate PRR at a later period following a requisite showing by PGE in the event of a change in US tax policy. This structure is not anticipated to be used in the 2025 RFP.

¹ Nameplate Capacity represents the maximum potential nameplate of the resource known as of July 11, 2025, the date this appendix was drafted and is subject to change. Total Nameplate Capacity is the combination of energy and, if applicable, storage resource capacity.

² Application will be submitted prior to bid submission due date.



PGE Corporate Headquarters

121 S.W. Salmon Street | Portland, Oregon 97204
portlandgeneral.com