

# Integrated Resource Planning



## STAKEHOLDER FEEDBACK: December 2025

Received: 2/26/2026

Stakeholder: OPCU Staff

Organization: Oregon Public Utility Commission

Applicable Public Meeting Date: December 10, 2025

1. If NREL's 2025 ATB is delayed, should we pause analysis or proceed with 2024 data?

**Stakeholder OPUC Staff:**

Proceed with a combination of NREL ATB 2024 data, BNEF data, and EIA data.



Received: 1/12/2026

Stakeholder: Katie Chamberlain

Organization: Renewable NW

Applicable Public Meeting Date: December 10, 2025

2. Has PGE considered all the 'planned transmission projects' identified through WestTEC's 10-year study that are relevant to PGE's system?

**PGE Response:**

Yes, PGE has considered all the planned transmission projects which were identified through WestTEC's 10-year study which are relevant to the PGE system.

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3. PGE's emissions trajectory and hourly emissions accounting. How do the constraints on thermal generation and market purchases applied in the model translate into operational practice? How does PGE treat the emissions from GHG-emitting generation its [sic] sells to the market?

**PGE Response:**

On the first question, CEP/IRP modeling directionally informs long-term planning and strategy, with operational practices being more dynamic and responsive to real-world conditions at the time of dispatch to ensure safe and reliable service. As described in the 2023 CEP/IRP, on a long-term basis, we expect to evolve operations of our thermal fleet to provide for reliability during periods of grid stress - when clean energy resources are scarce relative to demand and to meet resource adequacy requirements.

Further, organized market participation by PGE and others continues to evolve, as well as load growth and other emerging topics thus operational strategies will continue to evolve in response to these multitude of changing policies and dynamics as we move forward.

On the second question, for planning purposes, PGE estimates emissions associated with retail sales from model data in a way that generally aligns with the Oregon Department of Environmental Quality's GHG Reporting Program (OAR 315-215) for actual emissions. Forward-looking emissions associated with wholesale sales, which include sales into the market, are removed from the total amount of projected emissions associated with full system load to arrive at projected retail emissions. PGE will continue to discuss GHG emissions at future roundtables.

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4. Procurement updates from the 2023 RFP, 2025 RFP, and bilateral call. How much energy and capacity has PGE contracted for through these solicitations so far? How much is the company expecting to procure in total through these processes (given that some are still ongoing)?

**PGE Response:**

2023 Request for Proposals (RFP) - PGE has entered into agreements to construct two solar and battery hybrid projects for a total of 615 MWs:

- Biglow Optimization - 125 MW solar facility and 125 MW BESS. The project has an estimated commercial operation date at the end of 2027.
- Wheatridge Expansion - 240 MW solar facility and 125 MW BESS. PGE will own 110 MW of solar and 65 MW of BESS production capacity. NextEra Energy, Inc. will operate the facility, own the remaining 130 MW of solar and 60 MW of BESS production capacity and sell their portion of the output to PGE under a 30-year PPA. The project has an estimated commercial operation date at the end of 2027.

Additional Procurement Activities - PGE has also entered into the following agreements:

- Meadowlark BESS - a 20-year storage capacity agreement for a 200 MW BESS. This project has an estimated commercial operation date at the end of 2027.
- Nottingham BESS - a 20-year storage capacity agreement for a 200 MW BESS. This project has an estimated commercial operation date in 2028.

2025 Request for Proposals

PGE filed its 2025 RFP request for Final Shortlist acknowledgement in February 2026. The FSL contains 12 projects which provide approximately 5,000 MW of non-emitting resources. PGE expects to be able to secure agreements for approximately 2,500 MW of resources from the FSL, as discussed in the filing. PGE has not entered into any contracts for these projects, and they are represented in 2026 IRP analysis as available resources, not as part of the base portfolio.

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5. ELCC study: will PGE present ELCC values for all resources in an upcoming roundtable?

**PGE Response:**

An overview of key resource ELCCs was presented in the February 2026 roundtable.

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6. Can PGE run a scenario/sensitivity that reflects the potential for IRA tax credits to return?

**PGE Response:** PGE explored a variety of federal tax credit availability scenarios in portfolio analysis conducted for the 2023 IRP Update. The results of this analysis can be found in Section 6.6, pages 173 - 177. However, with no indication from the federal government that tax credits for renewable energy projects will be reintroduced under the



current administration, PGE considers the benefit of including such a sensitivity to be limited in the 2026 IRP and plans to devote modeling resources to more-actionable questions during this planning cycle.

