Integrated Resource Planning

STAKEHOLDER FEEDBACK: February 24, 2026

Received: 03/04/2026

Stakeholder: Katie Chamberlain

Organization: Renewable NW

Applicable Public Meeting Date: February 24, 2026

1. Why does PGE assume either a 0% or 100% seasonal capacity benefit for transmission expansion options (page 66)? Is it possible that the capacity benefit provided by the Transmission options would be somewhere in between?

PGE Response:

PGE's assumption of either a 0% or 100% seasonal capacity benefit for transmission expansion options is interpreted as the likely ability (yes/no) of a transmission project accessing a market where PGE could procure a firm capacity backed contract. While it is possible that a capacity benefit could lie somewhere between 0% and 100% depending on the quantity of firm transmission procured, PGE's current cost assumptions are representative of a firm capacity resource.

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2. The ELCC for 4-hr standalone storage appears low. Can you explain what factors are contributing to the ~20% winter ELCC?

PGE Response:

The Draft 2026 IRP 4-hr standalone storage ELCCs of 63% in Summer and 21% in Winter are roughly equivalent to values published in the 2023 CEP/IRP Update (Table 20) of 46% and 22% for Summer and Winter, respectively. The increase in Summer ELCC is attributed to the increased quantity of firm energy in PGE's base portfolio as compared against the 2023 CEP/IRP Update. Conversely, the relatively equal Winter ELCC demonstrates the suboptimal role of short-duration storage in addressing winter adequacy events, as highlighted in the 2023 CEP/IRP Section 6.2.3.1 Energy sensitivity adequacy assessment of Preferred Portfolio. As a third-party comparison, the recent study of Resource Adequacy in

the Pacific Northwest conducted by E3 suggests that Winter ELCCs of short-duration storage are <10% in the Pacific Northwest given the sensitivity of the region's system to hydro and winter energy constraints.

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Stakeholder: Carra Sahler, Alessandra de la Torre, Alma Pinto, Silvia Tanner, Alma Pinto, Paul Hawkins, Amanda Watson, Robin Straughan, Angela Crowley-Koch,

Organization: GEI, Climate Solutions, NWEC, OSSIA, Portland, Hillsboro, Tualatin, Multnomah County

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3. Given the language in Order No. 24-096, we urge PGE to use this CEP/IRP cycle to drive a deeper understanding of how CBRE projects could be developed and deployed in a way that benefits communities and the utility. Our communities do not have time to wait for future CEP/IRP cycles. Rather, 2030 is right around the corner and PGE needs to build upon learnings from this initial RFO and gather additional information now to accelerate CBRE projects. PGE's CBRE procurement strategy should also be integrated with PGE's SSR actions to meet the 2030 compliance obligation.

PGE's proposal looks to reduce by more than 50% its 2030 assumed availability of CBRE (from 155MW to 60-70MW). We understand that PGE has proposed these modeling assumptions based on the market intelligence it collected through the one RFO it has released so far. We have several concerns about treating the RFO response as the ceiling for modeling CBREs in this CEP/IRP. For example, it seems unlikely that PGE could only find just above 20 MW-35 MW of CBREs in future CBRE procurement efforts targeting a 2030 COD, even if these were only through additional RFOs.

First, to engage more thoughtfully in this IRP/CEP (and to avoid the pitfalls present in the RFO), we need transparency around the CBRE RFO costs and how those compare to the IRP modeling assumptions. It is our understanding that PGE's 2023 IRP modeling efforts selected 155 MW of CBRE projects along with utility scale resources as part of a lowest-cost, lowest-risk portfolio due to transmission constraints. We ask that PGE include the complexity of pricing in their discussion of CBREs. While smaller projects do not achieve maximum economies of scale, they provide real reliability and resilience value by not using transmission and can continue to be part of a lowest-cost, lowest-risk portfolio in the 2026 IRP.

Second, since the RFO did not deliver what PGE's 2023 CEP/IRP identified as possible, we request that PGE eliminate unnecessary restrictions on what kind of resources could be successful. For example, standalone solar should be a requested CBRE resource, instead of one accepted by bidders who responded with solar-only projects despite the minimum requirements.

We expect that PGE will use this modeling opportunity to more fully capture CBRE potential levels and price sensitivity to ensure this CEP/IRP cycle better captures the full market opportunity available in its territory. In our view, the results from this CBRE RFO should not artificially limit what PGE models in its CEP/IRP. In fact, the Commission's order directed PGE to consider broader procurement pathways beyond the RFO. Early stakeholder feedback articulated that the RFO approach was likely to capture only a portion of CBRE opportunities. The RFO learnings can support additional successful CBRE proposals and we encourage PGE to move forward with the next request for resources. For that reason, we recommend that PGE keeps its 155 MW assumed CBRE availability for the 2026 IRP, or at the very least that PGE significantly increases its assumed availability of CBRE beyond the currently proposed 60-75 MW.

Lastly, we would like more clarity on pricing. Smaller projects are more expensive, but offer the potential of a community benefit other than simply cash payments, for example in the form of energy resilience for a nonprofit or community organization. Providing energy resilience to an organization increases the cost of a project, but there was no guidance from PGE on whether that was desirable and would be accommodated in the pricing assumptions. Projects requiring community benefit explicitly will be more expensive but there was no guidance from PGE on pricing and costs in the RFO. Now that PGE has data from its first three rounds of RFOs it would be helpful for future procurement to provide a range of prices so applicants can understand if their project is appropriately scaled.

PGE Response:

PGE appreciates stakeholder feedback regarding CBRE modeling, procurement pathways, pricing transparency, and the role CBREs may play in advancing community benefits. PGE recognizes that the recent CBRE RFO may have provided limited visibility into standalone solar-only opportunities because the solicitation was structured around solar paired with storage and was not designed to independently evaluate standalone solar procurement potential. At the same time, PGE believes the assumptions used in the 2026 CEP/IRP should reflect the best available information on achievable CBRE potential, including procurement outcomes, demonstrated deployment, interconnection and siting constraints, financing feasibility, and project deliverability. Based on shortlisted and final offered projects advancing through procurement pathways, PGE proposes to reduce the near-term CBRE-Micro solar-plus-storage availability assumption to approximately 65 MW through 2030, reflecting market intelligence that viable solar-plus-storage CBRE projects were materially below the prior 2023 IRP assumption of roughly 100 MW.

Based on stakeholder feedback received on 2026 IRP modeling assumptions, for standalone solar, PGE proposes to replace the prior assumption with a market-informed

estimate based on demonstrated historical deployment of QF and Community Solar PV projects in PGE's service territory. Approximately 86 MW of these projects have historically been developed, providing a reasonable indicator of achievable market scale under real development, interconnection, siting, and financing conditions. Beginning in 2032, PGE implements a standalone solar-only CBRE option that ramps up to 43 MW of capacity, equivalent to approximately 50% of demonstrated historical QF and Community Solar deployment. This approach continues to put into action the bounds of the approximately 50 MW of standalone solar CBRE availability previously identified within the 155 MW CBRE potential from the 2023 IRP, while grounding the updated assumption in observable market activity.

PGE is not able to share project-specific pricing information at this time due to procurement confidentiality, but recognizes that community benefit and resilience elements may affect project costs and should continue to inform future procurement design. PGE will continue using procurement learnings to evaluate future CBRE pathways, including whether future solicitations should explicitly include standalone solar-only options and broader procurement approaches beyond the RFO structure.

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4. Yes. PGE found in its CBRE Potential Study that there were nearly twice as many stand-alone solar resources available than solar paired with batteries. However, the CBRE RFO required batteries or other dispatchable products. It is true that PGE accepted solar-only bids that came through, but there would have been more bids submitted if the RFO had encouraged solar-only bids. Solar-only projects can provide direct community benefits and are more familiar for community organizations and local governments. These projects can also be enhanced through combining with demand response measures, or other energy infrastructure that increases flexible load or climate resiliency. PGE's future procurement actions should make the dispatchability criteria optional from the start in order to receive more solar-only bids. In addition, we encourage PGE to be innovative in its thinking; if projects are not able to include battery storage in their project, PGE should consider taking on that component of the project, and supply the battery to a solar-only project. Additionally, PGE should thoughtfully explore how to support low-impact hydro projects participating either in a future CBRE RFO or other CBRE procurement paths that PGE should explore.

PGE Response:

Thank you very much for your input. The amount of standalone solar from the 2023 IRP was 50 MW as 100 MW was available for solar with storage when developing the Community Lens Potential Study on CBREs. Noting that the IRP is a planning tool, and not an operational tool, the 2023 IRP also modeled the Effective Load Carrying Capability

(ELCC) for standalone solar in the Summer months at less than half (23%) of that for solar paired with storage (51%). The ELCC for standalone solar also drops in half in the Winter to just 12%. From a resource adequacy perspective, this presents clear gaps in operational needs. By structuring the CBRE RFO to allow for virtual pairing and requesting resource-specific pricing, we were able to gain market intelligence for both stand alone and solar paired w/storage. PGE kept the Bidder's time and energy in mind when requesting the resources that would deliver the most value to address our system needs and therefore be most likely to be selected.