

Integrated Resource Planning



STAKEHOLDER FEEDBACK: January 14, 2026

Received: 2/21/2026

Stakeholder: Amy Webster

Organization: New Sun Energy

Applicable Public Meeting Date: January 14, 2026

1. This is related to the discussion about the types of CBIs (rCBI, pCBI, and iCBI) and how those metrics are used. Thank you for the clear explanation at the previous meeting. I understand how it works in the IRP context, but I was wondering how community benefits are used in the CEP. As required by HB 2021 and the Oregon Court of Appeals, the CEP is required to include a discussion of the HB 2021 policy statement. (For more information on the Court of Appeals decision, please look at this document that we filed in PacifiCorp's IRP/CEP proceeding: <https://edocs.puc.state.or.us/efdocs/HAO/lc85hao343130037.pdf> [edocs.puc.state.or.us]) Many of the CBIs that were included in the presentation (slides 59-60) would align with the goals of the HB 2021 policy statement, but I have not seen any materials discussing how these would be applied to the CEP. I look forward to future engagement on this and other topics. Thank you!

PGE Response:

The CBI framework presented in the January roundtable meeting is also applicable to the CEP's consideration of community benefits. The May 20, 2026 Roundtable will also discuss CBIs and provide more information on how PGE will quantify CBIs moving forward. Continued engagement on CBIs will inform the 2026 CEP/IRP.



Received: 6/18/2026

Stakeholder: OPUC Staff

Organization: OPUC Staff

Applicable Public Meeting Date: January 14, 2026

2. Resource Contract Extension Update

a. **Process: Do you have any comments or questions regarding contract commitment assumptions for needs assessment and portfolio analysis in the IRP?**

Staff appreciates the Existing Contract Summary slide which shows a list of the expiring contracts. Staff is interested in more visibility into the expiration or renewal of existing contracts and if there is a risk of losing resources to large-load customers. When PGE is comparing prices of contracts, how does that impact qualifying facilities procurement when the contract prices are more expensive than a QF and how might that influence planned qualifying facilities procurements.

Existing Contracts: Summary

Expiring Contract	Type	Max Capacity or Nameplate	Expiration Date	Update Since 2024
BPA Capacity Contract	Low-Emitting	200 MW	12/31/25	-
Douglas AMA	Hydro	2024: 258 aMW 2025: 201 aMW	12/31/25	-
Grant 20p	Hydro	434 MW	12/31/26	-
Douglas - Wells Legacy	Hydro	2025: ~71 aMW 2026: ~28 aMW	9/30/28	Updated PGE Share from 8.49% to 3.28%
Colstrip	Coal	296 MW	12/31/29	-
Douglas 10p	Hydro	79 MW	12/31/30	-
Calpine's Hermiston HRCO	Gas	250 MW	12/31/34	Extended to 12/31/34
Small VERs & Qualifying Facilities (QFs)	Wind & Solar	~57 aMW	12/31/45	Assume 75% Renewal

Notes:

- Each of these contracts is unique and this table does not capture all contractual complexities.
- Many of the above expiring contracts were also discussed at the October 2025 Roundtable.

PGE Response:

PGE appreciates Staff's interest in greater transparency regarding existing resource contracts and contract extension assumptions used in the IRP. PGE will continue to provide Staff updates regarding existing contracts, renewals, and procurement activities through confidential venues, including the RFP and AUT processes, where commercially sensitive information can be appropriately shared. PGE will also continue to provide public updates, to the extent practicable and consistent with confidentiality obligations, through the IRP and other public stakeholder processes, as relevant to the process at that time.



PGE also appreciates Staff's interest in understanding whether increasing large-load customers could create additional competition for existing resources. As part of ongoing portfolio management activities, PGE monitors market conditions and evaluates potential risks associated with resource attrition, including the possibility that certain resources may pursue alternative contractual arrangements or may no longer be available to the market due to previous seller's own growing loads. For example, PGE has observed instances in competitive procurements where developers have withdrawn projects from consideration to pursue opportunities with large-load customers.¹

With respect to Qualifying Facility (QF) procurement, PGE continues to comply with all applicable PURPA requirements and Commission orders. QF resources are acquired pursuant to established regulatory requirements and are evaluated separately from competitive resource procurements. As part of the OPUC's review of its state implementation of PURPA, Staff, utilities, and stakeholders reviewed avoided cost pricing policy including the possibility of using procured resources as a reference point for pricing.

QF resources often differ from bilateral market products with respect to project viability, commercial operation timing, contract term, and other operational characteristics. As a result, QF pricing structures may differ from those associated with other resource procurement options due to differing value propositions for PGE's customers. The IRP will continue to evaluate resource alternatives on a comparable basis to inform long-term planning decisions while recognizing PGE's distinct regulatory obligations related to QF procurement.

¹ <https://edocs.puc.state.or.us/efdocs/HAH/um2371hah345181028.pdf>; Pg. 6



3. Flexibility Study Overview

a. Process: Do you have any comments or questions regarding the purpose and approach of the flexibility study?

Staff looks forward to discussing the Flexibility Study results at the February 2026 Roundtable and would like to know if there will be any material updates or changes to the methodology, inputs, or data since the previous study. How does PGE plan to incorporate the results of the study into the IRP? Can PGE provide a flow or process diagram? When will the full stud(ies) be available? On slide 40 of the Roundtable presentation Staff would like to see the list of the existing contracts and the variables used for the base case assumptions.

Data Input	Flexibility Adequacy	Flexibility Values and Integration Costs
Test Years	2030, 2035	<
Gas Prices	Reference	<
Carbon Prices	Reference	<
Electricity Prices	Reference	<
Load Forecast	PGE Sept. 2025 for test years	<
VER generation	Updates in Progress	<
Existing Contracts	Up to date	<
Market Availability	Purchase & Sales limits aligned with Sequoia	<
Reserves	Regulation, contingency, and load-following reserves	<
Capacity Availability	DA, high load hour block capacity that is more expensive than existing system generation & markets, and provides no flexibility	RFP proxy resources and expensive, unconstrained purchases

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PGE Response:

More detail will be provided in the 2026 CEP/IRP on the Flexibility Study, with an appendix dedicated to describing Sylvan's method, analysis, assumptions, and approach. There will also be description about how the results are used in IRP analysis, but broadly the use aligns with the last IRP cycle where flexibility values for batteries and integration costs for VERs become part of the net cost view of proxy new resource options made available for selection in portfolio analysis. Section 6.7 and Figure 91 of the 2023 CEP/IRP Update includes information that will generally align with this planning cycle regarding how these

cost and benefit results from the Flexibility Study fit into net costs.² Where the flexibility study results fit as part of IRP analysis has been presented in a flow diagram revisited throughout this IRP cycle in roundtables, one example shown during the October 2025 roundtable.³

As indicated in the included image from the commenter above from the January 2026 roundtable⁴ and shown again at the February 2026 roundtable⁵ where draft results were presented, the Flexibility Study for the 2026 CEP/IRP includes assumptions that broadly align with other assumptions for this 2026 CEP/IRP. Existing resources and contracts assumed in the study will align with the IRP and were presented at the October 2025⁶ and January 2026⁷ roundtables and there will be a dedicated appendix in the 2026 CEP/IRP describing PGE's base existing portfolio of owned and contracted resources with description of associated assumptions for planning.

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https://downloads.ctfassets.net/416ywc1laqmd/UlLUBLOdenMjnrFJHv2mV/c382e175edae0e6ccffb806cd02bb6db/2023_CEP_IRP_Update_Errata.pdf#page=187.

3

https://assets.ctfassets.net/416ywc1laqmd/5htkxP4gUoP87kOxDAGk8k/8dee7d830b3d4cf665bcaa081fda4d8d/CEP_IRP_Roundtable_Oct_25-7.pdf#page=61.

4

https://assets.ctfassets.net/416ywc1laqmd/648yr09TbUuEKIYWqjnAUM/339dcd83770f22492009be2d2e5f6e9d/CEP_IRP_Roundtable_Jan_26-1.pdf#page=34.

5

https://assets.ctfassets.net/416ywc1laqmd/oh36t62jePnaIYjHNBxl6/f6a66f2c61cad892f05b6eff5e1850f6/CEP_IRP_Roundtable_Feb_26-2.pdf#page=13.

6

https://assets.ctfassets.net/416ywc1laqmd/5htkxP4gUoP87kOxDAGk8k/8dee7d830b3d4cf665bcaa081fda4d8d/CEP_IRP_Roundtable_Oct_25-7.pdf#page=51.

7

https://assets.ctfassets.net/416ywc1laqmd/648yr09TbUuEKIYWqjnAUM/339dcd83770f22492009be2d2e5f6e9d/CEP_IRP_Roundtable_Jan_26-1.pdf#page=28.



4. Clean Energy Plan

a. Process: Do you have any comments or questions regarding PGE's process for developing the Clean Energy Plan (CEP) and how it connects to the IRP process?

For the 2026 CEP IRP does PGE plan to conduct an updated hourly production cost simulation of its preferred portfolio under the reference case in a manner that separately tracks hourly purchases and hourly sales similar to how it did for the 2023 CEP IRP? Does PGE plan to use this analysis to revise its greenhouse gas emissions forecast and to revise its submission to DEQ? Finally, does PGE plan to update the preferred portfolio accordingly and provide a brief narrative explanation of the key planning insights derived from the exercise? This is in reference to Commission Order 24-096, Staff Recommendation 3 on page 17 of 33 of [Appendix A](#)

Staff Recommendation 3. Decline to acknowledge PGE's expected reduction of greenhouse gas emissions in the Clean Energy Plan as credible based on the preferred portfolio and direct the Company to make the following revisions and resubmit the revised plan before its IRP/CEP Update in 2025:

- *PGE shall conduct hourly production cost simulation of its preferred portfolio under the Reference Case in a manner that separately tracks hourly purchases and hourly sales. PGE will use this analysis to revise its GHG emissions forecast and to revise its submission to DEQ.*

PGE Response: For this planning cycle, PGE has modified how HB 2021 is considered in the modeling. Previously, the PGE-developed iGHG model was used to refine Aurora (PGE's Zonal Model, or PZM) thermal dispatch results to ensure retail emissions were limited to the HB 2021 targets. This was done on an annual level, in part leading to the Commission's interest in a more detailed hourly balancing view. For this 2026 CEP/IRP, PGE has evolved the methodology to incorporate HB 2021 emissions limits through an annual GHG glidepath modeled directly in Aurora, specifically in a new PZM framework as introduced in the October 2025 roundtable.⁸ Because the HB 2021 targets are now included in the hourly dispatch modeling, each scenario subject to the GHG glidepath works to meet the annual emissions limits across each year, on the hourly dispatch level of the model. This means that the emissions results for each HB 2021 emissions-compliant

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https://assets.ctfassets.net/416ywc1laqmd/5htkxP4gUoP87kOxDAGk8k/8dee7d830b3d4cf665bcaa081fda4d8d/CEP_IRP_Roundtable_Oct_25-7.pdf#page=51.



portfolio presented in the 2026 CEP/IRP will inherently be based on meeting the annual GHG glidepath targets assumed, through an hourly production cost analysis.