



June 16, 2021

Submitted via electronic mail

Patrick Oshie, Chair, Power Committee
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204

Dear Chairman Oshie:

Public Generating Pool (PGP) is writing to identify concerns with recent presentations related to the new Northwest Resource Adequacy Assessment (Adequacy Assessment) results, and to request that the Council pause additional adequacy presentations until a discussion with regional experts can be held on the technical elements of resource adequacy modeling.

PGP recognizes and values the role that the Northwest Power and Conservation Council has played in the development and publication of the Adequacy Assessment. The Council's work, along with other regional analyses, provides helpful information about regional generation and demand and, in some cases, is an important planning criterion for utilities when deciding to make significant investments in generating capacity.

As you know, the electric sector's generation mix and demand are undergoing significant change. How to measure, plan for, and ensure resource adequacy is a top issue for utilities. Even prior to early warnings of adequacy shortfalls, utilities recognized that the changes in the industry would require a different approach in adequacy evaluation and planning. While there may be many ways to model and approach this issue, ensuring the adequacy of the system is the highest priority for PGP member utilities because the consequence of getting adequacy wrong is highly impactful to electricity end use customers.

The recent roll-out of Adequacy Assessment results is of concern because the results differed significantly from the previous assessment. While all of us can be hopeful that our adequacy situation is better than we previously thought, the results derived from the Council's new model seem counterintuitive and have led to confusion among utilities and policy makers. PGP believes the Council has an important role in providing potential new insights regarding adequacy. However, to date, the results have been shared without the tool being fully vetted and often differed from one presentation to the next.

PGP recognizes there are many assumptions that go into modeling issues of this complexity. For this reason, PGP requests that the Council pause the release of any further Adequacy Assessment results, including the planned July 9th Resource Adequacy Steering Committee meeting, until we can hold a technical discussion among Council staff and other key utility industry modelers and organizations, such as WECC, NWPP, PNUCC, E3, EnergyGPS and Energy Strategies. PGP believes a gathering before the end of July would be helpful for the region to better understand how recent changes to modeling methodology are influencing the Adequacy Assessment.

Again, PGP values the role the Council plays in this area and encourages a regional discussion on the technical elements of this process to bring clarity to this very important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Therese Hampton". The signature is fluid and cursive, with a large initial "T" and "H".

Therese Hampton, Executive Director
Public Generating Pool

Cc: NWPCC Members

Bill Edmonds, NWPCC Executive Director

Ben Kujala, NWPCC Director of Power Planning

PGP Executive Committee