

**BEFORE THE PUBLIC UTILITY  
COMMISSION OF OREGON**

**LC 66**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

2016 Integrated Resource Plan

**Mayor Mark Gamba  
City of Milwaukie, Oregon**

**Comments on Staff Report**

I, Mayor Mark Gamba (City of Milwaukie), am writing to request that the Oregon Public Utility Commission (“Commission”) include the securing of 175 average megawatts (“MWa”) of new renewable resources in the 2016 Integrated Resource Plan (“Plan”) for Portland General Electric. My understanding is that the Commission will be making this determination on August 8, 2017. I am concerned that Commission staff has decided not to include this purchase in the Plan and believe this decision is short-sighted and fails to account for the significant public interest in seeing PGE move more quickly in greening its system.

The determination to not include this purchase in the Plan works in contradiction to both legislative decisions at the State of Oregon level, but also in contradiction to decisions being made at the local level. Earlier this year, the City Council approved as one of their top goals, the development of a Climate Action Plan for the City of Milwaukie. The City has initiated the development of our own path because we are concerned that the State is not being aggressive enough to create a long term, sustainable world for our residents. Inclusion of these 175 MWa of renewable power will provide for a smoother transition to renewable energy, with a steadier pace. This will lead to us purchasing renewable power at a reasonable cost, while simultaneously meeting the states goals.

I agree with PGE’s decision to propose renewable resource acquisition in advance of actual need. Renewable resources provide their energy into the market first, before fossil fueled generation. The inclusion of these MWa will have an immediate impact on the carbon emissions of the state – making PGE 50% carbon free at the end of 2020. We are a small town with limited budget. Decisions made by the Public Utility Commission to delay the implementation of carbon free resources will in turn lead to communities like ours trying to achieve such goals through other means. This trajectory promises to be more expensive for our community and less efficient for our government in a plans implementation. Incremental system changes managed by our Utility are a far easier mechanism for achieving our goals.

Early acquisition of renewables also gives utility engineers more experience in understanding how to integrate greater and greater penetrations of variable resources, something that will be needed in coming years. Again, I believe that giving the Utility these experiences will be far better than asking each small community to figure out their own path.

A decision to push out acquisition now might delay investment in more renewables for 12 years, time that we cannot afford, nor will communities like ours be able to wait for. In this portion of their plan, PGE is being responsive to what they are hearing from their customers and constituent groups, including the City of Milwaukie. This part of their plan honors the promises of SB 1547 (2016), takes a needed step toward meeting our climate goals, and is consistent with the climate goals of the city.

The commission should see the long-term picture and the risks associated with failing to meet greenhouse gas emissions goals in considering the risks of not moving aggressively here.

Respectfully submitted this 7<sup>th</sup> day of August, 2017.

Mayor Mark Gamba,  
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