

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 66**

In the Matter of	)	COMMENTS OF THE
Portland General Electric,	)	NW ENERGY COALITION ON THE
2016 Integrated Resource Plan.	)	REVISED RENEWABLE ACTION PLAN
_____	)	

The NW Energy Coalition (Coalition) is pleased to offer our full support for PGE’s revised renewable action plan filed in LC 66 on November 9, 2017. We would also like to recognize the outstanding effort made by the Company to work toward a path forward on this issue incorporating relatively diverse positions of the various stakeholders involved in the process. This effort resulted in a revised renewable action plan that will allow the Company to move forward with procurement of least cost/least risk resources in a manner that mitigates risks identified by staff and other parties to this docket.

PGE’s plan to issue an RFP for approximately 100 MWa of RPS-eligible resources will help meet the Company’s identified near-term energy and capacity needs in a manner that responds to concerns regarding renewable procurement plans that were expressed by the Commission and intervenors over the course of the 2016 IRP process.

The Coalition expressed continued support for PGE’s analysis demonstrating the clear benefits of early action procurement of renewable resources throughout the IRP process. We asserted that renewable resource procurement, especially in light of the benefits offered by the currently available Federal Production Tax Credits, were a strong resource complement to the bilateral negotiations for hydropower resource contracts PGE is currently undertaking. PGE’s additional analysis in the process of developing the revised renewable action plan supports this position.

We therefore recommend that the Commission approve PGE’s revised renewable action plan without conditions or amendments.

Respectfully submitted this 1<sup>st</sup> day of December, 2017.

*/s/ Wendy Gerlitz*

Wendy Gerlitz  
Policy Director