



# Oregon Citizens' Utility Board

610 SW Broadway, Suite 400  
Portland, OR 97205

(503) 227-1984  
[www.oregoncub.org](http://www.oregoncub.org)

May 4, 2023

Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

## **RE: LC 80 – CUB Round 0 Comments on PGE's CEP/IRP**

The Oregon Citizens' Utility Board ("CUB") appreciates the opportunity to provide comments on Portland General Electric's ("PGE" or "the Company") 2023 Integrated Resource Plan ("IRP") and Clean Energy Plan ("CEP"). It is exciting to begin the process of achieving Oregon's goal of 100% clean electricity, while meeting HB 2021's directive to minimize the burdens to and be inclusive of environmental justice communities.

CUB appreciates the work PGE has put into its first CEP. CUB notes this is the Company's first CEP and CUB expects the CEP planning process will continue to grow and improve over time. PGE has laid a foundation that provides opportunities for stakeholders to meaningfully comment on its CEP, and we look forward to working with the Company throughout this process. CUB offers the following high-level comments that are also in general support of the comments filed by the Energy Advocates on May 2, 2023.

### Accessibility

Based upon the Energy Advocates' comments on accessibility, we support their call for additional work in drafting a CEP that is understandable to non-expert members of the public, particularly for the environmental justice communities that HB 2021 specifically recognized. We encourage PGE to continue working with community members and advocates in developing an inclusive CEP during all stages of its development. Communities are an invaluable resource and can offer great insight into means to minimize energy burden for environmental justice communities.

### Modeling

CUB is interested in seeing further information from the models PGE used in the development of the IRP and CEP. We also hope that PGE will work toward updating outdated modeling scenarios. While we understand that an IRP will always have vintage concerns, CUB has concerns that without updated modeling that factors in the impact of the Climate Protection Program, or including opportunities that have come out of the Inflation Reduction Act (IRA) and the Infrastructure Investment and Jobs Act (IIJA), we will see a loss of cost-effectiveness in PGE's possible pathways.

## Importance of Decarbonization

CUB highlights the goal of decarbonizing our energy systems through HB 2021 implementation. CUB believes that a major pathway towards reaching our decarbonization goals while also reducing load needs will be through energy efficiency measures and demand response. CUB would like to see how modeling with the IRA and IIJA investments may change the near-term cost-effectiveness of energy efficiency and demand response, as well as a more robust analysis of whether it is appropriate for PGE to acquire energy efficiency and demand response investments referred to as “non-cost-effective.” CUB would like to see a cost-effectiveness analysis that considers these federal funding sources and the opportunities to mitigate energy burden in a meaningful way. The IRA and IIJA offer many opportunities to address inequities in our energy systems, particularly with opportunities to mitigate energy burdens, which is a key component of HB 2021. Further, some energy efficiency investments that are not cost effective in the near term may become cost effective over their useful life. It would be helpful to see PGE model the long-term cost effectiveness pathways of various energy efficiency investments. In certain circumstances, acquiring energy efficiency beyond what has been determined to be cost effective in the near term may benefit customers.

## Action Plan

Regarding the Company’s CEP, Section 12.3, Request for Proposals, CUB has previously expressed our concern regarding allowing a utility to begin a Request for Proposals (RFP) process prior to acknowledgement of its Integrated Resource Plan (IRP).<sup>1</sup> In general, procuring resources prior to the completing of the IRP may fail to consider whether the IRP had selected cost effective resources such as energy efficiency and demand response that would have had an impact on the total utility procurement requested in the subsequent RFP. In this instance, CUB did not oppose PGE’s request for partial waiver of the competitive bidding rules in its RFP because the Company intends to update its RFP with IRP guidance as the two proceedings move forward in tandem. While PGE’s request for a waiver to begin its RFP process was a one-time waiver, we reiterate that this process could be problematic and believe that the IRP and CEP should generally be acknowledged before the utility starts making future investments.

///

///

///

///

---

<sup>1</sup> See *In the Matter of Portland General Electric, Co., 2023 All-Source Request for Proposals, Request for Partial Waiver of Competitive Bidding Rules*, OPUC Docket No. UM 2274, [Order No. 23-146 at 9](#) (Apr. 21, 2023).

CUB appreciates the opportunity to provide initial comments on PGE's CEP and IRP. We look forward to continuing conversations around these plans with the Company, PUC Staff, and stakeholders throughout the duration of this process. We, again, appreciate PGE's efforts in developing the CEP for the first time and look forward to seeing updates in their final CEP and IRP filing.

Respectfully submitted,

*/s/Jennifer Hill-Hart*

Jennifer Hill-Hart  
Policy Manager  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. [jennifer@oregoncub.org](mailto:jennifer@oregoncub.org)

*/s/Kate Ayres*

Kate Ayres  
Policy Advocate  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. [kate@oregoncub.org](mailto:kate@oregoncub.org)