

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 80

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 Clean Energy Plan and Integrated
Resource Plan

RENEWABLE ENERGY COALITION’S
COMMENTS ON STAFF REPORT AND
FINAL RECOMMENDATIONS

The Renewable Energy Coalition (the “Coalition”) respectfully submits these Comments on Staff’s Report and Final Recommendations in the matter of Portland General Electric Company’s (“PGE’s”) 2023 Clean Energy Plan and Integrated Resource Plan (generally the “2023 IRP”). The Coalition appreciates Staff’s detailed review of many complicated issues in this proceeding. In particular, the Coalition appreciates Staff’s clear and reasonable language on planning assumptions regarding qualifying facilities (“QFs”). These issues are longstanding, and PGE’s actions are contrary to the available Commission guidance. The Coalition looks forward to getting this issue resolved, hopefully once and for all, in Docket No. UM 2038 or possibly UM 2000. In the meantime, the Coalition strongly supports Staff Recommendation 9:

The Commission should decline to acknowledge PGE’s avoided cost pricing inputs and direct PGE to recalculate its IRP inputs using an assumption of 75 percent for QF renewals and the QF success rate for Schedule 202 projects.¹

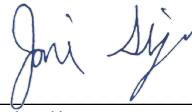
¹ Staff Report at 25 (Dec. 14, 2023).

The Coalition appreciates Staff's thoughtful consideration of this issue and believes the recommendation provides a clear and reasonable interim solution.

Dated this 12th day of January 2024.

Respectfully submitted,

Sanger Law, PC



Joni Sliger
Sanger Law, PC
4031 SE Hawthorne Blvd.
Portland, Oregon 97214
Telephone: 971-930-2813
Fax: 503-334-2235
joni@sanger-law.com

Of Attorneys for the Renewable Energy Coalition