



Oregon Citizens' Utility Board

610 SW Broadway, Suite 400
Portland, OR 97205

(503) 227-1984
www.oregoncub.org

January 9, 2024

via electronic filing

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

RE: LC 80 *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, 2023 Clean Energy Plan and Integrated Resource Plan - Oregon Citizens' Utility Board Comments on Staff's Report and Final Recommendations*

The Oregon Citizens' Utility Board (CUB) hereby notifies the Public Utility Commission of Oregon (Commission) and all affected parties that CUB will not be filing a substantive response to Commission Staff's (Staff) Report and Final Recommendations. After review of the Staff Report, CUB would like to applaud Staff for their diligent work and thoughtful recommendations for the Commission to consider while determining whether this Integrated Resource Plan (IRP), Clean Energy Plan (CEP), and their respective components are eligible for Commission acknowledgement. CUB also appreciates that PGE incorporated changes to its IRP/CEP based upon Staff's draft recommendations.

CUB is generally supportive of the recommendations detailed in the Staff Report. Generally speaking, the Report builds upon the foundation laid by Staff throughout this proceeding, including in its detailed Draft Recommendations. The majority of issues CUB addressed in response to Staff's Draft Recommendations remain largely unchanged in the Staff Report. Rather than reiterating our prior comments, CUB incorporates them here by reference.

While several CEP implementation issues were discussed in UM 2273 that were not necessarily ripe for discussion here, nor raised by CUB in this docket, we would like to note that we appreciate that the Commission has committed to ensuring accurate information is provided to Oregon-regulated voluntary purchasing programs in Order No. 24-002. And this comes as no surprise to CUB. At the same time, CUB also reiterates that RECs, components of Oregon's RPS, have no role in and no impact on the emissions standards contemplated in HB 2021.

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CUB will continue to engage in this combined IRP/CEP process and anticipates presenting oral comments at the forthcoming January 18, 2024, public meeting in this matter.

Respectfully submitted,

/s/ Bob Jenks

/s/ Mike Goetz

/s/ Jennifer Hill-Hart

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Portland, OR 97205
T. 503.227.1984