

August 11, 2025

Public Utility Commission of Oregon
201 High St. SE, Suite 100
Salem, Oregon 97301-3398

**RE: LC 80 - PGE's 2023 Clean Energy Plan and Integrated Resource Plan
Local Governments Comments in Response to 2023 IRP/CEP Update.**

The Multnomah County Office of Sustainability, City of Portland Bureau of Planning & Sustainability, City of Milwaukie Public Works Department, City of Beaverton Sustainability Program, City of Lake Oswego City Manager's Office, and City of Hillsboro Office of Sustainability appreciate this opportunity to comment on the update to the 2023 Integrated Resource Plan ("IRP") and Clean Energy Plan ("CEP") that Portland General Electric ("PGE") filed on June 18, 2025. We thank Staff at the Oregon Public Utility Commission (the "Commission") for its attention to opportunities for stakeholder comments in this docket.

The communities we represent have adopted climate action plans, decarbonization, net-zero, or clean energy goals, and/or have an interest in seeing reductions in the emissions associated with serving their energy needs. As a result, we have a strong interest in seeing PGE continue to work to comply with its decarbonization requirements under House Bill 2021 (2021)..

PGE must chart a path to HB 2021 compliance that mitigates both the risks of non-compliance and of rate shocks. However, we are concerned about the 2023 IRP/CEP Update's reliance on procuring utility-scale wind, solar, and storage with a commercial operation date of 2029. If PGE hits any roadblocks, this compliance strategy could jeopardize its ability to meet its first HB 2021 compliance target in 2030. Additionally, while we understand that HB 3179 (2025) will impact ratemaking in Oregon, we worry that the HB 2021 compliance strategy outlined in the 2023 IRP/CEP Update, compared to a more phased-in approach, could expose customers to start seeing the costs of those resources in rates all at once.

We are hopeful that PGE will seek to mitigate those risks through its current procurement efforts, via bi-lateral procurements and actions in the context of its 2023 and 2025 request for proposals. We appreciate PGE proactively seeking to leverage time-limited opportunities for cost savings that will sunset as a result of federal legislative changes. We encourage PGE, the Commission, and stakeholders to ensure that these procurements are as competitive as possible, and hope that these procurement efforts support a more phased-in approach to utility-scale resource additions necessary to comply with HB 2021.

PGE's strategy to comply with HB 2021 should also integrate community-benefitting energy resources. We appreciate seeing in PGE's preferred portfolio early additions of community-based

renewable energy (CBRE) resources, energy efficiency, demand response, and distributed resources.¹ We look forward to learning more about PGE's CBRE procurement efforts and their contribution to meeting PGE's preferred portfolio targets.

Respectfully submitted this 11th of August, 2025,

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¹ Docket No. LC 80, *Portland General Electric Company's 2023 Clean Energy Plan and Integrated Resource Plan Update* at 13 (Jun. 18, 2025), <https://edocs.puc.state.or.us/efdocs/HAD/lc80had337596113.pdf>.