



**Portland General Electric**

121 SW Salmon Street • Portland, OR 97204  
portlandgeneral.com

December 8, 2025

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attention: Filing Center  
PO Box 1088  
Salem, OR 97308-1088

Re: Docket No. UM 2033, PGE Transportation Electrification Plan

Filing Center:

Portland General Electric (PGE or the Company) wishes to note the Company's appreciation for Public Utility Commission of Oregon (Commission or OPUC) Staff's Report and Recommendation to the Commission, dated December 1, 2025 to accept PGE's 2026-2028 Transportation Electrification (TE) Plan and approve the Company's associated TE budget. Development and review of the TE Plan is an extensive and collaborative process that unfolds over many months, and we recognize the considerable time and effort Staff and stakeholders put into their feedback and recommendations. We thank them and look forward to continuing that collaboration during the 2026-2028 program years.

The Company also wishes to reaffirm our support for Staff's commitment, expressed in their report, to conduct a public workshop in 2027 to discuss benefit cost analysis best practices and methodological improvements with regards to TE. As we stated in our cover letter, in filing our final 2026-2028 TE Plan, we believe it is critical that stakeholders, BCA experts, and Staff come together with the utility in a public forum or workshop to openly debate the merits of proposed methodological changes, especially to the extent those may depart from established industry standards.

Staff appropriately noted that while discussions with PGE allowed Staff and the Company to agree in their conclusion that the TE Plan has a benefit cost ratio above 1 using the Societal Cost Test, areas of methodological disagreement remain and should be addressed before PGE submits its next plan. These areas of disagreement directly affect the interests of several parties, including underserved communities, as any adjustments made could have programmatic implications that may restrict the actions we can take to serve community needs. All parties should be clearly aware of any proposed changes and have an opportunity for full understanding and input through an open and transparent process, informed by best practices, similar to that led by Staff in UM 1893 with regards to BCA for energy efficiency.

Again, we thank Staff for their diligence in reviewing our plan, their willingness to engage with us in discussion around areas of uncertainty or disagreement, and their commitment to working with the Company and stakeholders in an open and transparent public process to further refine expectations and methodologies as the utility TE planning process continues to mature.

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Please contact Steven Corson at 503-550-0857 if you have questions or require further information.  
Please direct all formal correspondence and requests to [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com).

Thank you,

*/s/ Jason Salmi Klotz*

Jason Salmi Klotz  
Senior Manager, Regulatory Strategy and Planning

ATTACHMENT

Cc: UM 2033, UM 2165, AR 654 Service Lists  
Eric Shierman  
Sarah Hall