April 14, 2026

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

RE: Docket No. UM 2141 - Flexible Load Plan
Comments on PGE's Proposed Community Based Renewable Energy Pilot

We appreciate this opportunity to inform the Public Utility Commission's and Staff's consideration of Portland General Electric's proposed Community Based Renewable Energy projects (CBREs) pilot in this docket. We also seek to inform PGE's current proposal for treatment of CBREs in the context of their ongoing workshops related to the 2026 integrated resource plan prior to their filing of the IRP later this year. We originally submitted these comments directly to PGE, and decided to also file them in this docket given their relevance.

As organizations that care deeply about the benefits the energy transition can bring to communities, we are dedicated to supporting a smart and equitable implementation of Oregon's HB 2021 and we look forward to understanding PGE's planned approach and treatment of CBREs in its forthcoming Clean Energy Plan and Integrated Resource Plan (CEP/IRP) and to seeing PGE maintain or enhance its commitment to community-based clean energy infrastructure.

I. Community Based Renewable Energy Pilot

PGE's request in UM 2141[1] to retroactively frame its previous Request for Offers (RFOs) as a pilot program is confusing. We are concerned that this new direction does not create added benefits for ratepayers or communities. The filing does not outline next steps for procurement and fails to make the case that a pilot program will move procurement along any faster. PGE should expedite additional procurements and procurement pathways using lessons learned from the RFO process. The Small Scale Renewable (SSR) requirement that PGE meet 10% of its total electrical capacity with SSRs by 2030 is also fast approaching. CBRE procurement appears to be PGE's main path of SSR procurement and compliance, since no SSR RFP has been issued. Unless there is reason to believe that a CBRE pilot will move PGE toward its compliance requirements faster, a pilot seems like an unnecessary step.

We understand that the Oregon Public Utility Commission (OPUC)'s acknowledgement of PGE's CBRE Action Item was subject to the condition that PGE pursue a broader range of

[1] PGE's CBRE Pilot Proposal, Docket No. UM 2141 (Mar. 13, 2026), https://edocs.puc.state.or.us/efdocs/HAQ/um2141haq344576028.pdf.

procurement actions, outside of traditional procurement pathways like an RFO. PGE's filing does not outline other methods of procurement for the pilot program other than potentially additional RFOs. In PGE reply comments submitted to LC 80, PGE "anticipates that an RFP structure for CBRE resources would only begin the process to meet the targets identified in the CEP/IRP. If the market response to an RFP is sufficient in both volume and benefit, PGE may pursue those projects. If an RFP is unable to provide the volume and benefit expected, PGE will continue to move forward complementary processes to identify resources that may otherwise not choose to bid into an RFP-like structure."[2] We recommend that PGE follow the PUC's suggestion and look to alternative methods of procurement in addition to RFOs. We agree with the Commission's Order No. 24-096 that PGE should "consider innovative and long-term engagement that integrates emerging revenue streams like those from ETO, Oregon Department of Energy, and the federal government."[3]

This is especially true given how complex the application process for the CBRE RFOs was. While PGE provided flexibility, applications were still complex and approached 100 pages in length. PGE should consider different tiers of applications, providing less onerous opportunities for non-profits, Tribal entities, local governments and others that have not developed a renewable project before. This could result in more applications and an opportunity for PGE to assist applicants with less experience in connecting with potential developers to partner with.

PGE found in its CBRE Potential Study that there were nearly twice as many stand-alone solar resources available than solar paired with batteries. However, the CBRE RFO required batteries or other dispatchable products. It is true that PGE accepted solar-only bids that came through, but there would have been more bids submitted if the RFO had encouraged solar-only bids. Solar-only projects can provide direct community benefits and are more familiar for community organizations and local governments. These projects can also be enhanced through combining with demand response measures, or other energy infrastructure that increases flexible load or climate resiliency. PGE's future procurement actions should make the dispatchability criteria optional from the start in order to receive more solar-only bids. In addition, we encourage PGE to be innovative in its thinking; if projects are not able to include battery storage in their project, PGE should consider taking on that component of the project, and supply the battery to a solar-only project. Additionally, PGE should thoughtfully explore how to support low-impact hydro projects participating either in a future CBRE RFO or other CBRE procurement paths that PGE should explore.

II. Proposed Modeling in the CEP/IRP

[2] In the Matter of Portland General Electric Company, 2023 Clean Energy Plan and Integrated Resource Plan, LC 80, PGE Response to Round 1 Comments at 84, https://edocs.puc.state.or.us/efdocs/HAC/lc80hac131341.pdf

[3] In the Matter of Portland General Electric Company, 2023 Clean Energy Plan and Integrated Resource Plan, LC 80, Order No. 24-096 at 19, https://apps.puc.state.or.us/orders/2024ords/24-096.pdf.

Given the language in Order No. 24-096, we urge PGE to use this CEP/IRP cycle to drive a deeper understanding of how CBRE projects could be developed and deployed in a way that benefits communities and the utility. Our communities do not have time to wait for future CEP/IRP cycles. Rather, 2030 is right around the corner and PGE needs to build upon learnings from this initial RFO and gather additional information now to accelerate CBRE projects. PGE's CBRE procurement strategy should also be integrated with PGE's SSR actions to meet the 2030 compliance obligation.

PGE's proposal looks to reduce by more than 50% its 2030 assumed availability of CBRE (from 155MW to 60-70MW). We understand that PGE has proposed these modeling assumptions based on the market intelligence it collected through the one RFO it has released so far. We have several concerns about treating the RFO response as the ceiling for modeling CBREs in this CEP/IRP. For example, it seems unlikely that PGE could only find just above 20 MW-35 MW of CBREs in future CBRE procurement efforts targeting a 2030 COD, even if these were only through additional RFOs.

First, to engage more thoughtfully in this IRP/CEP (and to avoid the pitfalls present in the RFO), we need transparency around the CBRE RFO costs and how those compare to the IRP modeling assumptions. It is our understanding that PGE's 2023 IRP modeling efforts selected 155 MW of CBRE projects along with utility scale resources as part of a lowest-cost, lowest-risk portfolio due to transmission constraints. We ask that PGE include the complexity of pricing in their discussion of CBREs. While smaller projects do not achieve maximum economies of scale, they provide real reliability and resilience value by not using transmission and can continue to be part of a lowest-cost, lowest-risk portfolio in the 2026 IRP.

Second, since the RFO did not deliver what PGE's 2023 CEP/IRP identified as possible, we request that PGE eliminate unnecessary restrictions on what kind of resources could be successful. For example, standalone solar should be a requested CBRE resource, instead of one accepted by bidders who responded with solar-only projects despite the minimum requirements.

We expect that PGE will use this modeling opportunity to more fully capture CBRE potential levels and price sensitivity to ensure this CEP/IRP cycle better captures the full market opportunity available in its territory. In our view, the results from this CBRE RFO should not artificially limit what PGE models in its CEP/IRP. In fact, the Commission's order directed PGE to consider broader procurement pathways beyond the RFO.[4] Early stakeholder feedback articulated that the RFO approach was likely to capture only a portion of CBRE opportunities. The RFO learnings can support additional successful CBRE proposals and we encourage PGE to

[4] In the Matter of Portland General Electric Company, 2023 Clean Energy Plan and Integrated Resource Plan, LC 80, Order No. 24-096 at 19, https://apps.puc.state.or.us/orders/2024ords/24-096.pdf

move forward with the next request for resources. For that reason, we recommend that PGE keeps its 155 MW assumed CBRE availability for the 2026 IRP, or at the very least that PGE significantly increases its assumed availability of CBRE beyond the currently proposed 60-75 MW.

Lastly, we would like more clarity on pricing. Smaller projects are more expensive, but offer the potential of a community benefit other than simply cash payments, for example in the form of energy resilience for a nonprofit or community organization. Providing energy resilience to an organization increases the cost of a project, but there was no guidance from PGE on whether that was desirable and would be accommodated in the pricing assumptions. Projects requiring community benefit explicitly will be more expensive but there was no guidance from PGE on pricing and costs in the RFO. Now that PGE has data from its first three rounds of RFOs it would be helpful for future procurement to provide a range of prices so applicants can understand if their project is appropriately scaled.

III. Community Benefits

Community benefits are a critical component of CBRE projects and we understand from the first three iterations of the RFO that those submitting projects did not understand the type of community benefits desired. We believe that the Community Benefits & Impacts Advisory Group (CBAIG) comments should be unredacted, at the discretion of CBIAG members, in order for more learnings and best practices for future project proposals. With both tax credit and SSR deadlines looming, more information will lead to better proposals and fewer delays and rebids.

In addition, it would be helpful to have more clarity on Community Benefit Indicators (CBI). While a list of preferred CBIs was included in the RFO, not all community benefits fit into the preferred CBI list provided. It would have been helpful for PGE to provide more robust support to help applicants be successful in this part of the application. A list of examples that show CBIs applied effectively, and the types of CBIs that have been approved in the past with the categories they fit into.

While applicants were allowed to re-apply, or update their applications, given the tightening timelines around federal incentives, developers could use this guide to have a higher success rate not only in successfully completing the application process but to be inspired in new ways to support communities. Previous approved applications as well as other types of projects PGE and CBIAG members hope to see, such as agrivoltaics, community-owned projects, direct financial benefits, and microgrids that support community resilience. It would also be helpful to understand what level of detail is required for community benefit plans, as developers are hesitant to promise community benefits in case the project is not selected and have been shown to struggle with this portion of the application.

In conclusion, environmental justice and other advocates intentionally included CBREs in HB 2021 to make certain there were tangible Oregon community benefits resulting from HB 2021. Since utilities are not required to build projects in Oregon, communities supporting HB 2021 want to ensure direct community benefits as a result of the legislation. Additionally, PGE has represented to advocates that CBREs are one of the main avenues to see community benefit as part of HB 2021 compliance. CBREs are an important part of HB 2021 and of Oregon's clean energy transition, and should not be an afterthought in planning or in procurement. We are invested in seeing the CBRE program succeed and urge PGE to consider our requests.

Sincerely,

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