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

October 14, 2022

Via Electronic Filing

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

Re: UM 2225 Investigation into Clean Energy Plans; Comments on Staff's Resiliency Planning Standards and Practices by Portland General Electric Company

Dear Filing Center:

PGE appreciates the dedication and hard work Staff has done in developing Clean Energy Plan (CEP) resiliency planning standards and practices under Docket UM 2225. On September 7, 2021, Staff filed a report drafted by U.S. Department of Energy's Grid Modernization Lab Consortium entitled, "Considerations for Resilience Guidelines for Clean Energy Plans".[1] PGE welcomes the opportunity to provide feedback needed to advance the Oregon's resiliency goals in tandem with the State's decarbonization goals.

Overall, PGE finds GMLC's report to be robust and in-depth. We see GMLC's report as a manual or framework for approaching resiliency planning and intend to apply its standards and practices, where feasible and appropriate. We agree with Staff that GMLC's report supports CEP risk-based evaluation of resiliency opportunities, while summarizing the "approaches, considerations, and examples of risk-based approaches for power system and community resilience planning". Lastly, PGE agrees with Staff's recommendation that the CEP resiliency-specific Community Lens guidance outlines "what analysis the utilities should perform, while the GMLC report outlines how they might perform it".[2]

Please direct questions or comments to Stefan Brown at (503) 464-8172. We look forward to further engagement with Staff and stakeholders on our approach.

Sincerely,
/s/ Shay LaBray
Shay LaBray
Senior Director, Regulatory & Resource Strategy

/s/ Kristen Sheeran
Kristen Sheeran
Director, Resource Planning and Sustainability

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[1] The GMLC report can be found at https://edocs.puc.state.or.us/efdocs/HAH/um2225hah113046.pdf.

[2] Staff's Near-term guidance on Community Lens Analysis for the first CEPs was provided in the Staff memo found at https://edocs.puc.state.or.us/efdocs/HAU/um2225hau15478.pdf