

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 2273**

|                                    |   |                            |
|------------------------------------|---|----------------------------|
| In the Matter of                   | ) |                            |
|                                    | ) |                            |
| PUBLIC UTILITY COMMISSION OF       | ) | COMMENTS OF THE            |
| OREGON,                            | ) | OREGON CITIZENS' UTILITY   |
|                                    | ) | BOARD ON SCOPING QUESTIONS |
| Investigation Into House Bill 2021 | ) |                            |
| Implementation Issues.             | ) |                            |
| _____                              | ) |                            |

The Oregon Citizens' Utility Board appreciates the opportunity to weigh in on scoping considerations for the implementation issues portion of the HB 2021, Clean Energy Plan (CEP) investigation. We offer our brief initial thoughts below.

**What Open Questions or Issues Need to be Addressed or Resolved by the Commission?**

The Commission could offer near-term guidance on how to craft a plan in the public interest per ORS 469A.420(2). All involved in the CEP processes could benefit from input on what parties envision would meet those considerations. What analysis is necessary to determine the economic or technical feasibility of the plan? Or its effect on the reliability and resilience of the electric system? Well-designed planning objectives can provide a framework for translating policy objectives into holistic infrastructure investment strategies.

What are possible performance incentives for early compliance? And how will the Commission determine these have been met?

How are utilities considering accessing existing federal incentives to inform their Clean Energy Plans? What is the status of those funding opportunities for each? Are there ways to maximize funding opportunities with collaborative planning?

Unspecified power is assigned a certain amount of emissions. As western states implement clean energy policies, the grid should be becoming cleaner, including unspecified power on the grid. As the western electricity market evolves, who is responsible for updating the emissions assigned to unspecified power? How often should that number be updated?

## **II. What Process or Processes Should be Used to Address Issues?**

UM 2225 benefited from the technical assistance provided in the first CEP investigation and it can likely benefit this “implementation issues” phase of the investigation. Continued open conversations and workshops with opportunities to comment, including in writing.

Dated this 11<sup>th</sup> day of April, 2023

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J Hill-Hart', with a long horizontal stroke extending to the right.

Jennifer Hill-Hart  
Policy Manager  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
Phone: 503.227.1984  
Email: [jennifer@oregoncub.org](mailto:jennifer@oregoncub.org)