

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2273

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Investigation Into House Bill 2021  
Implementation Issues

INTERESTED PERSON COMMENTS OF  
MULTNOMAH COUNTY OFFICE OF  
SUSTAINABILITY AND CITY OF PORTLAND  
BUREAU OF PLANNING &  
SUSTAINABILITY

Multnomah County Office Of Sustainability and the City of Portland Bureau of Planning & Sustainability submit these Interested Person comments pursuant to Chief Administrative Law Judge Nolan Moser's July 7, 2023 Memorandum<sup>1</sup> and thanks the Public Utility Commission (Commission) and ALJ Moser for exploring avenues for non-intervenor participation in this proceeding. We encourage the Commission to include Issue I(b)(3) in Phase 2 of UM 2273 and to explore early compliance incentives. We appreciate Commission questions about the feasibility of establishing performance incentive frameworks given its concern about the likelihood of viable pathways to early 2030 compliance. However, we still encourage the Commission to explore this topic given its potential connection to Community Green Tariff and other voluntary programs with participants that seek additionality.

As a local government, we see Community Green Tariff and other voluntary programs as potential drivers of decarbonization beyond the utilities' progress to reach its system-wide 2030, 2035, and 2040 goals. As a result of participants' desire for additionality, these programs would take the utility further in its path to decarbonization than it would have been without these programs. In light of what we understand are plans from Portland General Electric to file its first Community Green Tariff in upcoming months, we encourage the Commission to open a conversation on early compliance incentives as it may influence recognition of the environmental value that voluntary programs, including Community Green Tariff, may bring to the utility's system.

Respectfully submitted this 24th day of July, 2023,

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<sup>1</sup> Chief Administrative Law Judge Nolan Moser's Memorandum (Jul. 7, 2023).