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July 6, 2026

Via Electronic Filing to PUC.FilingCenter@puc.oregon.gov

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation into Marginal Cost Study Treatment of Costs for Large Customers and Further Modifications to Portland General Electric Company's Rule C and Rule I, Docket UM 2377, Climate Solutions, Columbia Riverkeeper, Community Energy Project, Green Energy Institute at Lewis & Clark Law School, and Oregon Environmental Council's ("Coalition") Comment

Dear Filing Center:

Enclosed for filing in Docket UM 2377 is Climate Solutions, Columbia Riverkeeper, Community Energy Project, Green Energy Institute at Lewis & Clark Law School, and Oregon Environmental Council's ("Coalition") Comment in the above referenced proceeding.

If you have questions or need any additional information, please do not hesitate to contact me.

Sincerely,

/s/ Cole Souder
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Climate Solutions, Columbia Riverkeeper, Community Energy Project, Green Energy Institute at Lewis & Clark Law School, and Oregon Environmental Council (collectively, the "Coalition") appreciate the opportunity to provide comments to the Public Utility Commission in Docket UM 2377 regarding Portland General Electric's (PGE) Advice No. 26-24 and additional Errata filings. The Coalition supports PGE's updated filings as in compliance with Order 26-154 and **recommends that the Commission approve** Advice 26-24 and the subsequent Errata. The Coalition also **recommends that the Commission open a separate docket** to determine the administration of PGE's Schedule 111 funds.

The Coalition greatly appreciated the additional time the Commission provided to review PGE's filing. The Commission's extension allowed stakeholders to diligently review Advice 26-24, confer internally and with other parties, and ask questions to PGE. We are also thankful for Staff's leadership in communicating with the Company and with the Company's willingness to provide clarification in a timely manner and make requested changes to its filing before the July 7, 2026, Public Meeting.

The Coalition was particularly concerned with PGE's inclusion of Special Condition 2 to its new Schedule 111 in its original filing of Advice 26-24. In recommending the surcharge to fund non-cost-effective energy efficiency, enabling repairs, and distribution energy resources (DERs) for low-income customers, the Coalition repeatedly stated that, under its conception, the Energy Trust of Oregon (ETO) would administer the funds.[1] The Coalition was disappointed to see that PGE sought to administer the program itself, not only because our recommendation sought ETO as the administrator, but also because PGE did not support the creation of the surcharge in the first place. The Coalition is happy to see that PGE has willingly removed Special Condition 2 from its updated filing.

In its July 1, 2026, Staff Report, Staff notes that the parties reached an informal resolution to open a separate docket to discuss program administration of Schedule 111.[2] The administration of Schedule 111 funds raises many difficult questions best answered in a separate docket. Beyond the general question of who the primary administrator should be, the following questions are a handful of additional issues that a separate docket can begin to resolve:

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[1] *See,* UM 2377, Coalition/300, Souder/5; Coalition/300, Souder/37; Coalition/400, Souder/5; Coalition/400, Souder/43; Coalition's Opening Brief, at 4; Coalition's Opening Brief, at 57.
[2] UM 2377, Staff Report, at 3–4 (July 1, 2026), available at https://edocs.puc.state.or.us/efdocs/HAU/um2377hau347390047.pdf.

- Should funds be pooled for all three identified purposes, or should each purpose receive a specific percentage of funds?
- Should there be any more targeted geographic preferences for the funding other than limiting their use to PGE customers?
- What threshold should define "low-income"?
- What percentage of the funds should go towards administrative expenses?
- To what extent should program design be based on continual input of stakeholders?
- To what extent should program design be beholden to the preferences of stakeholders?
- What are the appropriate stakeholders to make recommendations or determinations in program design and administration?
- Should each program seek to maximize energy savings or maximize the number of low-income customers that benefit from funded programs?
- Is it best for programs to supplement existing, cost-effective programs with offerings that cover the full cost of an efficiency upgrade, or is it best to create entirely new programs?
- What information sharing will be necessary to allow the administrator to optimize the use of the funding?

Bringing together ETO, Staff, stakeholders that recommended the creation of the surcharge, other interested stakeholders that serve communities that may benefit from the surcharge, and PGE should allow for an effective program design. While the Coalition would certainly like to see funds begin to go towards reducing the energy burden for low-income customers as soon as possible, a brief delay to allow for proper program design seems prudent to ensure that the long-term benefits of Schedule 111 will be maximized. A separate docket where parties can convene, discuss implementation concepts, and make proposals to the Commission appears at this time to be the best opportunity to achieve our collective goal of creating an equitable energy system.

The Coalition therefore asks the Commission to:

1. Adopt PGE's Advice 26-24, including Errata filings made on June 30, 2026, and July 2, 2026.
2. Open a separate docket for Staff, Stakeholders, ETO, and PGE to determine the optimal administration of Schedule 111 funds and make recommendations for Commission approval.

Thank you,

/s/ Cole Souder
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