Docket No. AR 676
Rulemaking to Establish Multi-Year Plan Framework

Written Comment Opportunity
Submissions requested by February 20, 2026.

Context

On January 27, 2026, OPUC—with facilitation support from the Great Plains Institute—hosted the second workshop in its ratemaking framework process (AR 676, Rulemaking to Establish Multi-Year Plan Framework).

Staff distilled the following key takeaways from input shared at the January 27, 2026 workshop:

- Muti-year plans are the form of PBR most associated with cost containment and it can be valuable to include performance incentive mechanisms to ensure that the utility is making cost containment decisions that do not degrade service quality and the public interest.
- Improperly calibrated PBR tools can lead to higher costs without better performance. We should be thoughtful of areas where a more targeted approach may be needed.
- We should look to avoid conflicts among performance goals and incentives, emphasizing the need for careful design to avoid unintended consequences.
- There are a range of perspectives on the use of performance incentive mechanisms (PIMs) versus scorecards and other performance tracking tools; interest in comparing pros and cons and ensuring flexibility and exploring where certain categories of goals and outcomes may be better suited to one over the other.
- Oregon has numerous objectives for clean energy, resilience, and equity. MRPs and other PBR approaches can help align incentives and manage costs for a balanced approach. When exploring targeted incentives for certain outcomes we should be thoughtful of potential trade-offs and overlaps.
- Strong interest in leveraging existing data to accelerate development and implementation of performance measures.
- Trackers and deferrals can be reasonable if held to high standards; recognition of tension between multi-year capital recovery and Oregon's "used and useful" requirement.
- Calls for adaptive approaches to manage uncertainty, portfolio-based planning, and mechanisms that balance reliability, affordability, and innovation.

This written comment period provides an opportunity for interested parties to share additional feedback and perspectives following that workshop.

Written Comment

The focus of the kick-off special public meeting and first Staff workshop was to develop a shared understanding of the core principles, opportunities, and cautions surrounding MRP and other forms of PBR. We also focused on understanding the full spectrum of opportunities to target MRP design and other PBR tools, like PIMs, to address desired goals and outcomes.

At this stage, Staff plan to begin transitioning from fundamentals and theory toward concrete opportunities to enhance the Oregon ratemaking framework with MRP and other PBR. In the next workshop, we plan to discuss the current Oregon framework and start connecting priority goals and outcomes to high impact opportunities to improve the ratemaking framework. In addition to expanding and building upon feedback shared thus far, Staff respectfully requests stakeholders consider sharing their perspectives in response to the following questions in advance of the next workshop:

1. Please identify goals that best align with your vision for Oregon's regulated utility energy system. For each goal, please identify 1-3 outcomes that you think are **most important** to prioritize in an updated ratemaking framework. Staff notes that this is a prioritization exercise and not an indication that any particular goal or outcome will be excluded.

   *An *optional* table-formatted comment/response template for question 1 is provided for your convenience at the end of this announcement.*

2. What trade-offs and/or risks should be considered in developing an MRP and/or PBR framework for Oregon?
3. Which MRP and other PBR mechanisms do you think could be valuable tools for helping achieve the outcomes that are important to you?
4. Based on what you've learned about MRP/PBR and your desired outcomes from the ratemaking process and energy system, what specific aspects of Oregon's ratemaking frameworks are working well? Further, what specific areas do you see as high impact opportunities to improve? Please feel free to be as specific about process and ratemaking practices as you want.
5. What additional considerations do you think are important as Oregon works to develop its MRP framework?

Interested parties wishing to participate in this written comment period should file their submissions to the OPUC filing center under Docket No. AR 676 by February 20, 2026.

If you have any questions regarding this filing, please contact:

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In the table below, please identify which goals (up to five) align with your vision for Oregon's regulated utility energy system. Please provide 1-3 outcomes that you think are important for each goal and identify what PBR mechanisms and/or MRP design elements you think could be helpful tools for achieving that outcome. ***Your preferred list of goals or outcomes may or may not include goals and outcomes provided in the example list in CEG's pre-read*** *(available here in the docket)**.***

Goal	Please list 1-3 high-priority outcomes associated with this goal	Please indicate which MRP and/or PBR mechanisms could help achieve this outcome	Additional Notes
Goal 1	Outcome 1	List mechanism(s)	
	Outcome 2	List mechanism(s)	
	Outcome 3	List mechanism(s)	
Goal 2			
Goal 3			
Goal 4			
Goal 5			