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July 13, 2023

Via Electronic Filing

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
2023 Clean Energy Plan and Integrated Resource Plan.
Docket No. LC 80

Dear Filing Center:

Please find enclosed the Alliance of Western Energy Consumers' Motion to Modify the Procedural Schedule in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 80

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	MOTION OF ALLIANCE OF
COMPANY,)	WESTERN ENERGY CONSUMERS
)	TO MODIFY PROCEDURAL
2023 Integrated Resource Plan/Clean Energy)	SCHEDULE
Plan.)	
_____)	EXPEDITED CONSIDERATION
)	REQUESTED

I. INTRODUCTION

Pursuant to OAR 860-001-0420, the Alliance of Western Energy Consumers (“AWEC”) files this Motion to Modify the Procedural Schedule in the above-referenced docket with the Oregon Public Utility Commission (“Commission”). Due to the upcoming deadline for Commission Staff and stakeholders to file Round 1 comments, currently set for July 20, 2023, AWEC seeks expedited consideration of this Motion. AWEC has conferred with the other parties to this Docket and the following parties support this Motion: Portland General Electric Company (“PGE”), Commission Staff, the Oregon Citizens’ Utility Board (“CUB”), Renewable Northwest, NewSun Energy, and the Renewable Energy Coalition. As of the filing time, no party has indicated that it opposes this Motion. To the extent responses to this Motion are requested or required, AWEC requests that such responses be due by July 17, 2023 and replies be due by July 18, 2023.

II. MOTION

On July 7, 2023, PGE filed an “Addendum” in this Docket incorporating several input forecasts of demand and generation supply and a reevaluation of PGE’s portfolio analysis. The Addendum included significant changes to PGE’s projected capacity and energy needs, among other things. Due to the significance of these changes, and the proximity of their filing to the July 20, 2023 due date for Staff and stakeholder Round 1 comments, AWEC requires additional time to review the changes and refresh its analysis for comments based on those changes. AWEC initially raised this issue with Commission Staff, CUB, and PGE, and these parties agreed to the following changes to the current procedural schedule:

Current Schedule	Proposed Changes
July 20, 2023: Round 1 Staff and Stakeholder Comments	July 27, 2023: Round 1 Staff and Stakeholder Comments
August 30, 2023: PGE Reply Comments	September 6, 2023: PGE Reply Comments
September 7, 2023: Special Public Meeting/Commissioner Workshop	September 13 or 14, 2023, depending on Commission availability: Special Public Meeting/Commissioner Workshop

All other dates would remain unchanged in the existing procedural schedule. Accordingly, these changes will not impact the deadline for Commission acknowledgement of the IRP/CEP in the existing procedural schedule.

In addition, PGE has agreed to the following changes to discovery timelines to ensure that only a one-week extension of the Round 1 comment deadline is necessary:

- PGE will make all workpapers supporting the Addendum available as soon as possible in response to a data request (AWEC has already issued this data request).
- PGE will make best efforts to respond to data requests on the Addendum within five days. This five-day turnaround will only apply to data requests on the Addendum (not

more general requests on the IRP/CEP), and it will expire on July 22, 2023, five days before Staff and Stakeholder testimony would be due under the proposed procedural schedule above (i.e., data requests issued on or after July 22, 2023 will not be subject to a five-day response period).

- PGE will also make best efforts to respond to data requests within five days that request an update to previously issued data requests based on the new information provided in the Addendum, with the same July 22, 2023 deadline identified above. PGE will likely need to request extensions for DRs not related to the Addendum through July 22, 2023 to allow for prioritization of Addendum-related DRs.

After reaching agreement with PGE, Staff, and CUB, AWEC presented this proposal to the other parties to this docket, whose positions on it are identified above where responses were received.

III. CONCLUSION

For the foregoing reasons, and specifically to ensure that Staff and Stakeholder comments respond to the most current information provided by PGE in this docket on its future resource needs, AWEC respectfully requests that the Commission grant this Motion and modify the procedural schedule as presented above.

Dated this 13th day of July, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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