



Portland General Electric Company

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October 16, 2024

Via Electronic Filing

(puc.filingcenter@puc.oregon.gov)

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: LC 80 – PGE’s Motion Requesting Extension of Time to File Its Integrated Resource Plan and Clean Energy Plan Update and 2026 Integrated Resource Plan and Clean Energy Plan

Dear Filing Center:

Enclosed for filing in the above-referenced docket is PGE’s Motion Requesting Extension of Time to File Its Integrated Resource Plan and Clean Energy Plan Update and 2026 Integrated Resource Plan and Clean Energy Plan.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Apperson", is written over a light blue horizontal line.

Erin E. Apperson
Managing Corporate Counsel

EEA: nm

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 80

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 Integrated Resource Plan.

**PGE’S MOTION REQUESTING
EXTENSION OF TIME TO FILE ITS
INTEGRATED RESOURCE PLAN
AND CLEAN ENERGY PLAN
UPDATE AND 2026 INTEGRATED
RESOURCE PLAN AND CLEAN
ENERGY PLAN**

I. INTRODUCTION

Under OAR 860-027-0000 and OAR 860-027-0400(1), Portland General Electric Company (PGE) respectfully requests the Public Utility Commission of Oregon (OPUC or Commission) waive OAR 860-027-0400(11), OAR 860-027-0400(3), and OAR 860-027-0400(4). In seeking these waivers, PGE respectfully requests and extension to file its 2023 Integrated Resource Plan (IRP) and Clean Energy Plan (CEP) Update from January 25, 2025, to March 14, 2025. Similarly, PGE seeks an extension to file its next full IRP and CEP from January 25, 2026 to March 16, 2026. Additionally, in Order No. 24-096, the Commission directed PGE to “revise and resubmit certain elements of the CEP with its next IRP/CEP update.” Therefore, while it does not appear necessary to seek modification to Order No. 24-096, PGE notes that this waiver request would operate to maintain the timing of these certain elements of the CEP to align with the IRP/CEP Update.

II. SUPPORT FOR MOTION

A. 2023 IRP/CEP Update Extension Request

PGE’s IRP/CEP update is currently due on or before January 25, 2025. PGE’s 2023 IRP was acknowledged with additional conditions and directives by the Commission on January 25, 2024.¹ OAR 860-027-0400(11) requires PGE to submit an annual update on its most recently

¹ The Commission’s decision was memorialized in Order No. 24-096.

acknowledged IRP on or before the acknowledgment order anniversary date. The IRP update should also provide an update on the utility's actions implementing the annual goals in the CEP filed with the most recently acknowledged IRP.² Furthermore, in Order No. 24-096, the Commission directed PGE to update certain elements of its CEP with its next IRP/CEP update.

PGE respectfully requests an extension of this deadline for its IRP/CEP Update and accompanying elements of its CEP to incorporate preliminary 2024 emissions data associated with power delivered to retail customers as calculated under ODEQ's methodology. The preliminary 2024 emissions data will be used to compare to what was forecasted for 2024 in the 2023 CEP/IRP. While 2024 emissions data are finalized and verified by a third party in September 2025, preliminary 2024 emissions data become available in the PGE's Environmental, Social, and Governance (ESG) report in March 2025. By extending the filing date by seven weeks PGE will have another full year's worth of preliminary emissions comparison, which will add important emission trajectory information to the CEP and IRP analysis.

In addition, the extension will allow for the incorporation of updates from Bonneville Power Administration (BPA) regarding their planned expansions of transmission infrastructure. BPA is expected to update the region regarding the status of their 'Evolving Grid' projects in October 2024. Given the impact of transmission availability assumptions on PGE's portfolio planning analysis, it is reasonable to provide sufficient time to incorporate the most recent updates on these important infrastructure plans.

B. 2026 IRP/CEP Extension Request

Under OAR 860-027-0400(3), a utility

must file an IRP within two years of its previous IRP acknowledgment order or as otherwise directed by the Commission. If the energy utility does not intend to take any significant resource action for at least two years after its next IRP is due, the energy utility may request an extension of its filing date from the Commission. An electric company subject to ORS 469A.415 must explain how it will make continual progress toward towards meeting the clean energy targets in ORS 469A.410 during the period of extension when making a request.

Under OAR 860-027-0400(4), a utility "must file a CEP with the Commission concurrently with an IRP filing required under Section (3) of this rule and in the same docket."³

² OAR 860-027-0400(11)(d)

³ This regulatory framework also envisions filing the CEP within 180 days of filing the IRP.

PGE seeks an extension of filing the next full IRP/CEP commensurate with its request for an extension of the IRP/CEP Update. This will enable PGE to have commensurate time between when it files the update to the next full IRP/CEP.

PGE will continue to take steps toward continual progress despite this minor extension request. PGE is currently engaged with its 2023 RFP, and as previously stated, intends to engage in a subsequent procurement process to address its capacity needs and make continual progress toward emissions reduction targets. Therefore, granting this request will not impact PGE's ongoing procurement efforts.

III. CONCLUSION

For the reasons stated above, PGE respectfully requests that the Commission issue an Order waiving the filing deadline for its IRP/CEP Update and granting an extension of time for the IRP/CEP Update to March 14, 2025. PGE also respectfully requests that the Commission issue an Order extending the filing deadline for its next IRP/CEP from January 25, 2026 to March 16, 2026.

Dated this 16th day of October 2024.



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