

**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
2023 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 April 18, 2025 to June 18, 2025. 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.”¹ 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. BACKGROUND

A. 2023 IRP/CEP Update Extension Request

PGE’s IRP/CEP update is currently due on or before April 18, 2025. PGE’s 2023 IRP was acknowledged with additional conditions and directives by the Commission in Order No. 24-096 on April 18, 2024. OAR 860-027-0400(11) requires PGE to submit an annual update on its most recently acknowledged IRP on or before the acknowledgment order anniversary date. The

¹ Order No. 24-096, April 18, 2024.

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.

As PGE discussed with stakeholders in its May 2024 roundtable, even though an IRP Update is an informational filing, PGE's 2023 IRP Update, which is also its first CEP Update, has a broad scope. As presented in those roundtable materials, PGE is working to refresh data and update numerous aspects of the IRP modeling methods, including development of new scenarios and multiple entirely new analyses.³ This work is taking time to develop and present to stakeholders. As discussed in the February 2025 roundtable, PGE has currently only presented its approach to portfolio development with stakeholders.⁴ Additional time is needed for PGE to complete and present the results of portfolio and sensitivity analysis, and finalize findings prior to filing its IRP/CEP Update. PGE respectfully requests an extension of this deadline for its IRP/CEP Update and accompanying elements of its CEP to provide additional time for this process. IRP/CEP Update materials would benefit from greater stakeholder review including draft preferred portfolio results and sensitivity analysis.

Additionally, PGE has experienced key managerial changes directly impacting the IRP team, including the departure of PGE's IRP manager. For this reason, PGE respectfully seeks additional time to ensure proper expertise is given to this important filing.

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.⁵

² OAR 860-027-0400(11)(d)

³ May 2024 Roundtable, slides 13-17:

https://assets.ctfassets.net/416ywc1laqmd/5J5soUhsbBj9gBnjBkL4Au/f2e39ce0fcd24ca329c004ebb7e71ea8/IRP_Roundtable_May_24-2.pdf

⁴ February 2025 Roundtable, slide 17.

⁵ OAR 860-027-0400(3)

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.”⁶

PGE seeks an extension of filing the next full IRP/CEP commensurate with its request for an extension of the IRP/CEP Update to June 18, 2026. 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 extension request. PGE is currently engaged with its 2023 RFP, and as previously stated, is actively advancing its 2025 RFP via Docket UM 2371 to address its capacity needs and make continual progress toward emissions reduction targets. Therefore, granting this request will not impact these ongoing efforts.

III. CONCLUSION

For the reasons stated above, PGE respectfully requests that the Commission issue an Order extending the filing deadline for its IRP and CEP Update from April 18, 2025, to June 18, 2025, and extending the deadline for its next full IRP/CEP from April 18, 2026 to June 18, 2026.

Dated this 4th day of March, 2025.

Respectfully submitted,



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⁶ This regulatory framework also envisions filing the CEP within 180 days of filing the IRP.