

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2033**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Transportation Electrification Plan

**PGE’S MOTION REQUESTING AN
EXTENSION OF THE TIMELINE TO
FILE 2026-2028 TRANSPORTATION
ELECTRIFICATION PLAN**

Expedited Consideration Requested

I. INTRODUCTION

Pursuant to Public Utility Commission of Oregon (OPUC or Commission) Order No. 19-032,¹ OAR 860-001-0420 and OAR 860-087-0001 (2), Portland General Electric Company (PGE) hereby submits to Chief Administrative Law Judge (ALJ) this request for a modification of the timeline set by the Commission in Order No. 25-146. On March 18, 2025, PGE filed an Application Requesting a Waiver of the Deadline to File 2026-2028 Transportation Electrification Plan. The waiver of the May 1 deadline for filing of the multiyear Transportation Electrification Plan (TE Plan) was granted in Order No. 25-146 on April 16, 2025, and set a new timeline of July 1, 2025, for PGE’s TE Plan filing. For reasons described below, PGE now respectfully requests that the Chief ALJ slightly modify this timeline to allow PGE to file its draft 2026-2028 TE Plan no later than July 25, 2025.

¹ *In the Matter of Public Utility Commission of Oregon, The Delegation of Certain Duties and Powers of the Public Utility Commission of Oregon, Order No. 19-032, Appendix E. Delegation of Authority to Chief Administrative Law Judge.*

II. STANDARDS

Public Utility Commission of Oregon (OPUC or Commission) rules provide that the Commission may waive any rules in Division 87 for good cause shown on its own motion, or upon request.² Order No. 19-032 provides the Chief ALJ with the delegated authority to modify timelines specified in a Commission Order. PGE assumes that any exercise of the delegated authority to modify a timeline must also be consistent with the bases for the establishment of the current, extended timeline in Order No. 25-146: that is that a modification of the timeline requires good cause shown and a request in writing consistent with the requirement for a waiver of the May 1 deadline, provided by OAR 860-087-0001.

PGE's application for a waiver of the OAR 860-087-001 deadline of May 1 was a substantive motion. However, PGE believes that a request for modification of a timeline specified in a Commission order is a procedural motion requiring a good faith effort to confer with other parties to seek agreement about the subject of the motion, consistent with OAR 860-001-0420 (2). Pursuant to that rule, PGE must also describe the result of the effort to confer. On June 24, 2025, PGE attempted to confer with all parties on the service list in docket UM 2033 via email and provided parties a copy of this motion and 24 hours to respond to the request. Only one party responded to this request at the time of this filing and indicated that it did not oppose the motion. Prior to this attempt to confer, PGE was informed by the Oregon Department of Justice that Commission staff takes no position on PGE's motion.

Because of the very short amount of time available before the July 1 deadline, PGE requests expedited consideration of this motion, and asks that the Chief ALJ direct that any responses to this motion be filed by no later than 3:00 p.m. on June 27, 2025.

² OAR 860-087-0001(2).

III. GOOD CAUSE

PGE previously requested, and the Commission granted, a waiver and extension in Order No. 25-146, setting a revised timeline for submission of the Company's next draft TE Plan for Commission Staff and stakeholder review no later than July 1, 2025. Despite diligent efforts to meet this timeline, PGE is still awaiting critical third-party information that will affect various aspects of its own fleet electrification plan.

PGE is including PGE's fleet electrification strategy in its TE Plan filing consistent with Commission direction in Docket No. UE 435 and Order No. 24-454. The pending information is pertinent to that strategy and to the Company's overall cost containment and customer affordability commitments. PGE believes that submission of the TE Plan without this information would provide insufficient information to stakeholders and the commission for them to review the company's strategy. Therefore, PGE seeks additional time to receive and incorporate this information into the upcoming TE Plan, and thus also, a limited extension to the filing timeline until no later than July 25, 2025. PGE recognizes that a further delay is not ideal and will work diligently with stakeholders during the TE plan review process to see if efficiencies in the calendar can be found to mitigate the impact of this requested delay on the docket schedule.

PGE does not believe the information to be immediately forthcoming, but if PGE is able to obtain this information prior to July 1 with sufficient time to integrate the information into the draft TE Plan, PGE will file the draft TE Plan by the July 1 date. Given the lack of certainty however, PGE is seeking this modification to the timeline to provide additional flexibility.

IV. CONCLUSION

PGE respectfully asks that the Chief ALJ exercise the authority granted by Order No. 19-032 and modify the timeline set by the Commission in Order No. 25-146 to file the TE Plan no

later than July 1, 2025. PGE prays that relief on the basis that additional, third-party information that is needed to complete the filing will not be available to the Company in time to file the draft TE plan on or before that date. PGE asks that the Chief ALJ modify the timeline to allow the filing at any time, but in no case later than July 25, 2025.

For all the reasons described above, PGE requests that the Chief ALJ grant this request for a modification to the timeline set in Order No. 25-146.

DATED this 26th day of June, 2025.

Respectfully Submitted,



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