



OAR 860-027-0400(1) provides that the Commission may waive any obligation in OAR 860-027-0400, including OAR 860-027-0400(3), upon application by the utility and for good cause.

OAR 860-027-0400(3) states an energy utility must file an IRP within two years of its previous IRP acknowledgment order or as otherwise directed by the Commission.

OAR 860-027-0400(11) states “Each energy utility must submit an annual update on its most recently acknowledged IRP. The update is due on or before the acknowledgment order anniversary date. The energy utility must summarize the annual update at a Commission public meeting. The energy utility may request acknowledgment of changes, identified in its update, to the IRP action plan. The annual update is an informational filing.”

OAR 860-027-0400(4) states an electric company that is subject to ORS 469A.415 must file a CEP with the Commission concurrently with an IRP filing and in the same docket. If filing the CEP concurrently with the IRP would create an undue burden or a significant issue impacting IRP or CEP review exists, the electric company may file a written request to the Commission to extend the filing date for the CEP up to 180 days after the IRP filing date. If the Commission grants an extension for filing the CEP, it may establish an alternate schedule for a utility presentation and comments.

House Bill 2021 (HB 2021), codified as ORS 469A.400 to 469A.475, is a landmark climate policy that directs the state’s large investor-owned utilities and electricity service suppliers to decarbonize their retail electricity sales by 2040 with consideration for benefits to local communities.

ORS 469A.415(6) requires the Commission ensure that the utilities demonstrate continual progress within the CEP planning period toward meeting the clean energy targets and are taking actions as soon as practicable to reduce emissions at reasonable cost to retail electricity consumers.

ORS 469A.415(3)(a) states that a CEP must be based on or included in an IRP filing made no earlier than January 1, 2022, and filed no later than 180 days after the IRP is filed or developed within an IRP process and incorporated into the IRP filed with the Commission.

## Analysis

### *Background*

The objective of the IRP process is to ensure an adequate and reliable supply of energy at the least cost and least risk to the utility and its customers in a manner consistent with the public interest. A CEP must be based on or included in an IRP filing. PGE made its initial 2023 IRP and CEP filing with the Commission on March 31, 2023.<sup>1</sup>

On April 18, 2024, the Commission issued Order No. 24-296, acknowledging PGE's 2023 IRP subject to Staff conditions.<sup>2</sup> However, the Commission did not acknowledge PGE's 2023 CEP and directed the Company to revise and resubmit certain elements of the CEP with its next IRP/CEP Update. The Commission also further directed the Company to take additional actions as listed in Staff Report Attachment 1 and as modified at the Public Meeting discussion.

Also on April 18, 2024, the Commission issued Order No. 24-097 memorializing the decision that PGE's 2023 IRP and CEP filing demonstrates continual progress under HB 2021 as modified by Staff's recommendations.<sup>3</sup> HB 2021 requires that an electric company demonstrate in its CEP that it is making continual progress within the planning period towards meeting the clean energy targets.

### *PGE's CEP Compliance Filing Progress Update*

On December 31, 2024, PGE filed its compliance progress update on the IRP/CEP engagement improvements as directed by OPUC in Order No. 24-096. This requires PGE to work collaboratively with Staff, stakeholders, peer utilities, and Community Benefits and Impacts Advisory Groups in a dedicated work group to develop clear and actionable improvements to community and stakeholder engagement in subsequent IRPs/CEPs.<sup>4</sup>

### *PGE's Motion to Delay IRP/CEP*

PGE's IRP/CEP Update is currently due on or before April 18, 2025. PGE requests an extension to file its 2023 IRP/CEP Update from April 18, 2025 to June 18, 2025.<sup>5</sup> In

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<sup>1</sup> Docket No. LC 80, [PGE Initial Application](#), 2023 Clean Energy Plan and Integrated Resource Plan.

<sup>2</sup> [Order No. 24-096](#) at 23 (April 18, 2024) (2023 IRP acknowledged subject to conditions; 2023 CEP not acknowledged; resubmission of certain plan elements required).

<sup>3</sup> [Order No. 24-097](#) at 1 and 3 (April 18, 2024) (Determination of Continual Progress).

<sup>4</sup> Docket No. LC 80, PGE [Compliance Filing](#) to Order No. 24-09 (December 31, 2024). (PGE states it has formed a new Community Engagement Team, held listening sessions and met with PacifiCorp staff to discuss best practices. PGE states it is currently developing a community engagement strategy with feedback from stakeholders and PGE aims to file the revised plan in the LC docket by the end of March 2025).

<sup>5</sup> Docket No. LC 80, PGE [Motion](#) Requesting Extension of Time to File IRP/CEP, March 4, 2025.

addition, PGE also seeks a corresponding extension to file its upcoming full 2026 IRP and CEP to be filed on or before June 18, 2026. PGE states this will allow the commensurate time needed between when it files the Update to the next full IRP/CEP.

PGE further states, “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.”<sup>6</sup> PGE states it is updating aspects of the IRP modeling methods, including developing new analyses. In PGE’s February 2025 roundtable, the Company presented its approach to portfolio development with stakeholders. Additional time is needed for PGE to present the finalized findings prior to filing its IRP/CEP Update. PGE also states key managerial changes are directly impacting the IRP team and asks for additional time to ensure adequate attention is given to this filing.

### *Staff’s Position*

#### 2023 IRP Update Extension

Staff finds PGE’s request for a 60-day extension of the 2023 IRP/CEP Update filing meets the standard of good cause in OAR 860-027-0400(1) because the Company needs additional time to develop analysis and present findings before filing the IRP Update. The Company is also experiencing recent impacts to the IRP team that impedes its ability to make progress as needed. In Order No. 24-096, PGE’s 2023 IRP was acknowledged subject to Staff’s adopted conditions and recommendations. Order No. 24-096 lists several compliance items that PGE must file before or with the IRP/CEP Update. These include, but are not limited to, a small-scale renewable resource compliance analysis, community benefit indicators, a report on federal incentive implementation, and a transmission study.<sup>7</sup> Staff finds it reasonable to allow PGE more time to complete this work.

#### Clean Energy Plan Update

Regarding the CEP Update, Staff acknowledges that this is PGE’s first CEP Update. Order No. 24-096 requires PGE make greenhouse gas emissions revisions and resubmit a revised plan before the IRP/CEP Update.<sup>8</sup> Granting this extension will provide PGE the time to further develop its CEP analysis. Staff notes that the IRP compliance items may impact the CEP work or vice versa.

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<sup>6</sup> Docket No. LC 80, PGE [Motion](#) Requesting Extension of Time to File IRP/CEP at 2, March 4, 2025.

<sup>7</sup> [Order No. 24-096](#) at 6, 9, 20, Appendix A at 26-27 (PGE agreed to develop, prior to the next IRP Update, a transmission study which would explore options to alleviate congestion on the South of Allston flow gate and upgrades to the Bethel-Round Butte line.).

<sup>8</sup> [Order No. 24-096](#) Appendix A at 27.

Under OAR 860-027-0400(4) a utility must file a CEP with the Commission concurrently with an IRP filing and in the same docket. Staff recognizes PGE's effort to concurrently file the IRP/CEP Update and IRP/CEP as consistent with OAR 860-027-0400.

#### 2026 IRP/CEP

Staff finds PGE's request for an extension of time for the next full 2026 IRP/CEP filing falls under OAR 860-027-0400(3) because it states an energy utility must file an IRP within two years of its previous IRP acknowledgment order or as otherwise directed by the Commission. Staff notes the rule does not tie the IRP filing to when the IRP Update was last filed, but rather when the Commission order was issued acknowledging the IRP.

Staff finds PGE's request for a 60-day extension to file the next full 2026 IRP/CEP meets the standard of good cause in OAR 860-027-0400(1) because the Company is working to update numerous aspects of IRP modeling methods and developing entirely new analyses for the IRP/CEP Update that will impact the next full 2026 IRP/CEP filing. It is going to take several months for Staff and stakeholders to review the IRP/CEP Update and potentially Staff may have IRP Update feedback for PGE to incorporate into the next IRP/CEP. Staff finds the 60-day extension reasonable given the complex nature of PGE's current IRP/CEP work and PGE's recent IRP staff turnover.

#### Conclusion

Staff recommends granting PGE a 60-day extension of the due date from OAR 860-027-0400(11) for PGE's 2023 IRP/CEP Update to June 18, 2025, and also a 60-day extension of the due date from OAR 860-027-0400(3) for PGE's 2026 IRP/CEP to June 18, 2026.

The schedule would be as follows:

1. PGE 2023 IRP/CEP Update, June 18, 2025
2. PGE 2026 IRP/CEP Filing, June 18, 2026.

#### **PROPOSED COMMISSION MOTION:**

Grant PGE a 60-day extension to file its 2023 IRP/CEP Update and a 60-day extension for the upcoming 2026 IRP/CEP filing.