

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 435

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision.

NEWSUN ENERGY LLC'S
CLOSING BRIEF

NewSun Energy LLC (“NewSun”) respectfully submits this Closing Brief to the Oregon Public Utility Commission (“Commission”). NewSun continues to recommend as it did in its Opening Brief that the Commission should reject Portland General Electric Company’s (“PGE’s”) proposed increase to its authorized return on equity (“ROE”) until PGE is on track to meet Oregon statutory clean energy mandates. NewSun also responds briefly to one statement made by Staff to clarify that issues related to the prudence of PGE’s acquisition of the Clearwater Wind Project are outside the scope of this docket and reserved for resolution in UE 427. Specifically, Staff noted that “for the most part, no party has challenged the prudence of the pre-January 1, 2025, capital investment PGE seeks to include in rate base.”¹ As such NewSun clarifies that the prudence of Clearwater is outside the scope of this docket.²

¹ Staff Opening Brief at 75-76.

² PGE/2400, Batzler-Meeks/5; *In re Portland Gen. Elec. Co., Renewable Resource Automatic Adjustment Clause (Schedule 122) (Clearwater Wind Project)*, Docket No. UE 427, Order No. 24-091 at 4 (Apr. 4, 2024).

Dated this 8th day of November 2024.

Respectfully submitted,

NEWSUN ENERGY LLC

/s/ Marie P. Barlow

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