



Portland General Electric Company

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Erin E. Apperson

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November 8, 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; In the Matter of PORTLAND GENERAL ELECTRIC
COMPANY, 2023 Clean Energy Plan and Integrated Resource Plan

Dear Filing Center:

Enclosed for filing in the above-referenced docket is Portland General Electric Company's Notice of Withdrawal of its Motion Requesting Extension of Time, filed on October 16, 2024.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Apperson", 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 Clean Energy Plan and Integrated
Resource Plan.

PORTLAND GENERAL ELECTRIC
COMPANY’S NOTICE OF VOLUNTARY
WITHDRAWAL

Portland General Electric Company (PGE) provides this notice of voluntary withdrawal of its Motion Requesting Extension of Time filed on October 16, 2024. In its motion, PGE requested that the Commission waive OAR 860-027-0400(11), OAR 860-027-0400(3), and OAR 860-027-0400(4). The purpose of the waiver was to allow PGE to file its 2023 Integrated Resource Plan (IRP) and Clean Energy Plan (CEP) Update on March 14, 2025, and to file its next full IRP and CEP on March 16, 2026.

Under OAR 860-027-0400(11), a utility “must submit an annual update on its most recently acknowledged IRP. The update is due on or before the acknowledgment order anniversary date.”

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.”

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.”

In conferring with Staff and representation from the Department of Justice, PGE understands that Staff’s position is that the deadline for IRPs, CEPs, and associated updates is based on the date of the issuance of the written acknowledgment order, not the date of the public meeting where the acknowledgment decision was made. Based on this interpretation, which PGE

does not oppose, PGE's 2023 IRP/CEP Update is due on or before April 18, 2025, and then its next full IRP/CEP will be due on or before April 18, 2026.¹

PGE's waiver request was made based on Staff and the Commission's treatment of a prior request for extension/waiver in LC 73, which referenced the acknowledgment decision date as the relevant date that triggers subsequent deadlines.² However, PGE understands that Staff's position is based on the plain language of the rule, which PGE believes is appropriate.

For these reasons, PGE voluntarily withdraws its waiver request with the understanding that its 2023 IRP/CEP Update is due on or before April 18, 2025, and then its next full IRP/CEP is due on or before April 18, 2026.

DATED this 8th day of November 2024.

Respectfully submitted,



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¹ Order No. 24-096 with the Commission's acknowledgment decision regarding the 2023 IRP/CEP is dated April 18, 2024.

² See Order No. 21-422.