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October 15, 2021

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: LC 73 – Portland General Electric Company’s Response to Staff Report

Dear Filing Center:

Enclosed for filing today in the above-referenced docket is Portland General Electric Company's Motion Requesting Extension of Time to File Its Next Integrated Resource Plan.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink that reads "Loretta Mabinton". The signature is written in a cursive, flowing style.

Loretta I. Mabinton
Managing Assistant General Counsel

LIM: dm

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2019 Integrated Resource Plan.

**PGE’S MOTION REQUESTING
EXTENSION OF TIME TO FILE ITS
NEXT INTEGRATED RESOURCE
PLAN**

I. INTRODUCTION

Under OAR 860-027-0000 and OAR 860-027-0400(1), Portland General Electric Company (PGE) respectfully requests the Commission waive OAR 860-027-0400(3) and grant an extension of time in which to file its 2021 Integrated Resource Plan (IRP) and associated updates. Specifically, PGE requests that the time for filing be extended from March 16, 2022 to March 31, 2023.

II. BACKGROUND

PGE’s 2019 IRP was acknowledged with additional conditions and directives by the Commission on March 16, 2020.¹ As required by OAR 860-027-0400(8), PGE submitted an annual update on January 29, 2021.² OAR 860-027-0400(3) requires PGE to file its next IRP within two years of its IRP acknowledgment order. Therefore, PGE’s next IRP is due on or before March 16, 2022.

PGE respectfully requests an extension of this deadline to develop the newly enacted planning requirements established in HB 2021, including but not limited to more robust State carbon targets and the development of a Clean Energy Plan (CEP), as well as to incorporate enhanced analysis in PGE’s next IRP. Further, creating an action plan that provides the ability to meet changing system needs while also addressing decarbonization will require substantial

¹ Commission Order No. 20-152: <https://apps.puc.state.or.us/orders/2020ords/20-152.pdf>

² PGE 2019 IRP Update: <https://edocs.puc.state.or.us/efdocs/HAH/lc73hah13049.pdf>

communication with Staff and our public participants. An extension will allow for a collaborative, comprehensive, and coordinated planning effort across the company that is consistent with Public Utility Commission of Oregon (OPUC) and State requirements. Additional time will also provide PGE and stakeholders the opportunity to consider planning and procurement paths to comply with HB 2021. If granted the extension, PGE intends to make its draft IRP available in time to ensure that sufficient time is provided for stakeholder review.

III. SUPPORT FOR MOTION

An extension will allow the IRP to incorporate increased planning requirements. Included in this planning will be the emission reductions targets established in Oregon House Bill 2021, including reductions of 80%, 90%, and 100% of greenhouse gas emissions by 2030, 2035, and 2040, respectively. Additionally, Oregon House Bill 2021 established two new planning requirements: the CEP and the community benefits and impacts advisory group (CBIAG). The CEP must be based on or included in the IRP and will include several new areas. Additionally, together with the CBIAG, PGE will create a report every two years detailing PGE's impacts and benefits of the CEP to its community.³ While there is some overlap in planning conducted in the IRP and these two work streams, the additional time will be used to integrate them into one holistic plan.

In addition to the new planning requirements, PGE is currently undertaking a significant redevelopment of several analytical components of the IRP. PGE is working to determine the most informative set of emissions outputs, develop our climate adaptation study, evaluate contractual transmission constraints, and incorporate an enhanced treatment of distributed energy resources. Each of these topics involves additional sharing of information and feedback with Staff and participants, as well as a tangible increase in complexity and interdependence of analyses, requiring more time and effort to set-up, model, interpret, and share results than in previous IRPs.⁴ The additional time requested will allow PGE to develop these and the other topics listed above.

³ This report must include a discussion of energy burden and disconnections for residential and disconnections for small commercial customers, opportunities to increase contracting with businesses owned by women, veterans and/or Black, Indigenous, or People of Color, actions within environmental justice communities to improve resiliency, the distribution of investments in environmental justice communities, the social, economic or environmental justice co-benefits from PGE's investments, the experience of our customers, and actions to encourage customer engagement.

⁴ An example of this complexity can be seen in calculating emissions. The 2019 IRP included annual emission estimates for each of the portfolios evaluated; however, in the next IRP, PGE seeks to work with Commission Staff and our public participants to determine the most informative set of emissions outputs. This will likely increase modeling complexity and require significantly more resources than were allocated in earlier IRPs.

Finally, an extension of time will allow for the opportunity to better characterize the results from PGE's 2021 All-Source request for proposals (RFP).

A critical component of the IRP is a robust participant process. A March 2022 deadline could limit sufficient public process on the areas of development described above. However, an extension will allow the company and its public participants additional time to share information and feedback in order to develop an IRP that is better informed by and responsive to public input. To that end, PGE has been working diligently on developing its 2022 IRP through a robust and transparent public process. Since March 2020, PGE has held twelve public roundtable workshops covering topics including community values and expectations, capacity assessment, transmission analysis, climate adaptation, price futures, supply-side resource options, and distributed energy resources.⁵ PGE will continue its robust and transparent public input process with additional monthly public meetings to provide Staff and public participants with the continued opportunity to participate in the IRP development and overall progress.

IV. CONCLUSION

For the reasons stated above, PGE respectfully requests that the Commission issue an Order waiving the filing deadline for its next IRP and associated updates, and granting an extension of time for the next IRP to March 31, 2023.

Dated the 15th day of October, 2021.



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⁵ All meeting materials to date can be found at [IRP Public Meetings - Resource Planning | PGE \(portlandgeneral.com\)](https://www.portlandgeneral.com/irp-public-meetings-resource-planning).