



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

September 7, 2021

Anna Kim
Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, OR 97301-3398
puc.filingcenter@state.or.us

Re: Docket Number UM 1696

Dear Ms. Kim,

I'm writing on behalf of Portland General Electric (PGE) in support of the Energy Trust of Oregon's (ETO) request for an exception for the retirement of existing pre-1995 vintage manufactured homes and replacement with new NEEM 1.1 or better manufactured homes. We understand from the Energy Trust that the approval of this request would allow them to work with approximately 100 homes per year, resulting in roughly 1,500,000 kWh in savings.

For more than a decade, PGE has worked with low-income stakeholders, customer advocates, and state and federal agencies and policymakers on developing policies and programs to address the energy burden for low-income customers. Energy efficiency and weatherization programs help reduce the amount of energy required to provide the same level of energy services, which in turn reduces the household's energy burden. For old manufactured homes, the best way to deliver those benefits may be to replace that housing. This program holds promise for some of Oregon's most vulnerable citizens and we believe it makes sense to grant this exception through March 31, 2025 so that ETO can continue to work with Oregon Housing and Community Services on its manufactured home replacement program.

Thank you for your consideration.

If you have any questions, please feel free to contact me at Sania.Radcliffe@pge.com or 503-464-7329.

Kind regards,

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

Sunny Radcliffe
Director, Government Affairs and Environmental Policy
Portland General Electric

cc: Chair Megan Decker, Oregon Public Utility Commission