



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

April 20, 2020

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 Oregon Energy Trust's request for an extension of its Manufactured Home Replacement Pilot – by the earlier of either \$500,000 in additional expenditures or one year of coinciding market presence with a forthcoming Oregon Housing and Community Services (OHCS) home replacement program, and the request of a cost-effectiveness exception for the electric and gas space heating Manufactured Home Early Retirement Measures. We understand from the Energy Trust that the approval of this request would allow for approximately 30 additional sites, which should accommodate the existing pipeline of prospective sites and additional owner-occupied sites located in manufactured home parks.

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. The program holds promise for some of Oregon's most vulnerable citizens and we believe it makes sense to extend this pilot so that ETO can continue to work with OHCS on its home replacement program.

Thank you for your consideration.

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

Kind regards,

A handwritten signature in black ink, appearing to read "Sunny Radcliffe". The signature is fluid and cursive, written in a professional style.

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

cc: Chair Megan Decker, Oregon Public Utility Commission