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March 5, 2018

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem, OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC  
2018 Renewable Portfolio Standard Implementation Plan  
**Docket No. UM 1916**

Dear Filing Center:

Pursuant to the Oregon Public Utilities Commission's ("Commission") February 15, 2018, order, the Industrial Customers of Northwest Utilities ("ICNU") files these Comments on Portland General Electric Company's ("PGE" or the "Company") Renewable Portfolio Standard Implementation Plan ("RPIP") for the compliance years 2019-2023. In PGE's previous RPIP, ICNU identified a number of concerns it had with how the Company was calculating its incremental cost of compliance.<sup>1/</sup> These issues remain outstanding and ICNU maintains its position on them. Rather than repeat these concerns, however, ICNU expects to pursue them in the Commission's RPS rulemaking docket, AR 610.

If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Tyler C. Pepple  
Tyler C. Pepple

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<sup>1/</sup> See ICNU Comments in Docket Nos. UM 1755 and UM 1788.