

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2141

In the Matter of)
)
)
PORTLAND GENERAL ELECTRIC)
COMPANY,)
)
Flexible Load Plan.)
_____)

COMMENTS OF THE
OREGON CITIZENS' UTILITY
BOARD

COMMENTS OF THE
OREGON CITIZENS' UTILITY BOARD

January 24, 2022



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2141

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	COMMENTS OF THE
COMPANY,)	OREGON CITIZENS' UTILITY
)	BOARD
Flexible Load Plan.)	
_____)	

I. INTRODUCTION

The Oregon Citizens' Utility Board (CUB) files these comments on Portland General Electric's request to seek approval of the Flexible Load Multi-Year Plan (FLP). This request is before the Public Utility Commission of Oregon (Commission) as agenda item RA1 at the January 25, 2022 Regular Public Meeting. CUB writes these comments in support of Staff's recommendation in its January 18, 2022 public meeting Staff Report. CUB appreciates Staff's work in the case, including its outreach to stakeholders, and the quality and clarity of its memo. CUB would like to provide comments on two topics addressed by Staff: the use of a single consolidated deferral and the cost recovery proposal.

II. DISCUSSION

1. *Single Consolidated Deferral – Flexible Load*

In the FLP, Portland General Electric has shifted towards portfolio-level planning and budgeting for various FLP activities and programs. CUB is supportive of this approach. CUB also supports the consolidation of current FLP deferrals into a single filing to streamline the review process for stakeholders, Staff, and the Commission. CUB believes that this shift enables

parties to better understand FLP performance relative to IRP and DSP goals and the cumulative rate impact of PGE’s flexible load plan actives.

2. Cost Recovery Proposal

In this proceeding, Portland General Electric has proposed to create an alternative cost recovery mechanism for FLP costs. Portland General Electric’s alternative cost recovery mechanism includes a performance incentive based on portfolio budget and load impact goals. Staff has recommended not approving PGE’s cost recovery topic at this time but asks for further discussions on this topic to occur. CUB is open to engaging on this topic to find a solution that works for customers.

CUB supports Staff’s recommendation to reject PGE’s proposed cost recovery mechanism and enabling parties to have discussion on that topic. CUB would appreciate the opportunity to explore the differences between PGE’s cost recovery proposal and the current cost recovery mechanism. Additionally, CUB would like better to understand the updated cost effectiveness of flexible load resources before considering a performance incentive on FLP costs. At this time, there is insufficient information to examine the merits of PGE’s alternative cost recovery proposal.

///

///

///

///

///

///

///

III. CONCLUSION

CUB supports Staff's recommendation contained in the Staff Report for agenda item RA1 at the January 25, 2022 regular public meeting. CUB appreciates the hard work Staff has engaged in to analyze PGE's filing, and thanks PGE for continuing to find creative solutions to manage flexible load and most cost effectively serve its customers.

Dated this 24th day of January, 2022,

Respectfully submitted,

/s/ William Gehrke

William Gehrke
Economist
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. 503.227.1984
E. will@oregoncub.org