

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. AR 654

In the Matter of

DIVISION 087 REVISIONS

Comments

Staff thanks the stakeholders and utilities for their extensive engagement in this proceeding. Staff agrees with the changes to the draft rules that PGE proposed in written comments on June 15, 2022.

Additionally, Staff supports the edit NWECA proposed at the August 9, 2022 hearing: to change the language in section 0030(1)(D) from “the discussion may include” to “the discussion shall include”, in reference to how the utility reports on how the TE Plan met performance metrics.

This concludes Staff’s comments.

Dated at Salem, Oregon, this 12<sup>th</sup> of August, 2022

*Eric Shierman*

---

Eric Shierman  
Senior Utility Analyst  
Energy Resources and Planning Division