

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 80**

In the matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

2023 INTEGRATED RESOURCE PLAN  
AND CLEAN ENERGY PLAN

COMMUNITY RENEWABLE ENERGY  
ASSOCIATION COMMENTS

**I. INTRODUCTION**

The Community Renewable Energy Association (“CREA”) submits these comments on Portland General Electric Company’s (“PGE”) 2023 Integrated Resource Plan (“IRP”) and Clean Energy Plan (“CEP”). CREA has been following this docket with interest. We recommend that the Commission not acknowledge either the IRP or the CEP. We support the comments and observations made by NewSun Energy. We also generally support the comments made by other stakeholders recommending against acknowledgement of the IRP and CEP, but want to point out that the statutory standard for acknowledgement of the CEP is that it be economically **and** technically feasible. ORS 469A.420(2)(b). PGE’s plans are not technically feasible and do not meet Clean Energy Targets according to staff’s conclusions and PGE’s own admissions.

## **II. THE IRP MODEL EXCLUDES VIABLE RESOURCES**

We appreciate the Commission's critical inquiry into PGE's exclusion of a variety of highly viable and technically feasible resource options and the scales of options, which could and should have been included in the IRP model as eligible resources to support and accelerate the achievement of the Clean Energy Targets under HB 2021. As stakeholders have pointed out, there are hundreds of megawatts of resources that can come online sooner around the state, as well as hundreds or thousands of megawatts of distributed generation solar resources in the Willamette Valley and Portland area, all of which would substantially accelerate emissions reductions. Omitting numerous viable resource options from even being considered in the IRP models necessarily invalidates the model's reliability and demonstrates that the level of achievable emissions reductions has been artificially constrained. Therefore, PGE has not met the statutory standard of "taking actions as soon as practicable that facilitate rapid reduction of greenhouse gas emissions[.]" ORS 469A.415(6). Emissions reductions cannot be as soon as practicable when hundreds or thousands of megawatts of clean energy resource options are being excluded from PGE's plan. We also support NewSun's comments on this issue and recognize Jacob Stephens as a considerable expert in interconnection, transmission, and project development in Oregon and related to Bonneville Power Administration.

We remind the Commission of the objectives and requirements articulated throughout HB 2021 to not only facilitate rapid reduction of emissions but also to provide increased benefits from facilities within the State of Oregon. The long list of additional resources which PGE has excluded as options are overwhelmingly, if not entirely, Oregon-based resources that would

indisputably provide in-state benefits including jobs and energy security and resiliency. CREA represents counties which believe those projects should be located here in Oregon and should benefit our members and citizens, not just economically but also by increasing resiliency and local clean energy supply as intended under the law.

### **III. THE COMMISSION SHOULD NOT ACKNOWLEDGE THE IRP OR CEP**

CREA recommends that the Commission not acknowledge plans that fail to meet the basic statutory requirements. CREA does not believe that the Commission should provide its most important blessing of an “acknowledgement” to a utility when it fails to meet the statutory standards in various ways, much less in ways that willfully exclude viable resource options and other statutory compliance requirements from its proposal. An acknowledgement would legitimize those actions and become evidence in the record for a future rate case matter in which the Commission would be cited as authorizing such actions. In all cases, PGE remains subject to the compliance standards under HB 2021 and is obligated to continue meeting them. But endorsing such behaviors and approaches on this critical and time-sensitive issue sends an inappropriate signal and undermines the statutory intentions, objectives, and policies of the State of Oregon.

### **IV. CONCLUSION**

We encourage the Commission to hold the utility to its legal obligations under HB 2021 and not acknowledge the IRP or CEP. Thank you for considering these comments.

Dated this 24<sup>th</sup> day of January 2024.

Respectfully submitted,

                    /McArthur                    

Mike McArthur  
Executive Director  
Community Renewable Energy Association  
93350 Foss Ln.  
Wasco, OR 97065  
(541) 965-8057  
mwm@crearenewables.org