

March 22, 2024

Via Electronic Filing

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

Re: **Docket No. UE 435** - Oregon Citizens' Utility Board's Motion to Dismiss or Segregate Certain Issues, *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision*

Dear Oregon Public Utility Commissioners and Staff:

The undersigned organizations (the "Energy Advocates") support the Oregon Citizens' Utility Board's (CUB) Motion to Dismiss or Segregate Certain Issues in docket UE 435, Portland General Electric's (PGE) rate case filed on February 29, 2024. We share CUB's concern with PGE's request to re-litigate many of the issues resolved in the Company's last rate case, including a request to increase shareholders' return on equity and to shift risks to customers.

PGE asked for this rate case less than two months after customers first felt the significant shock of its January 2024 rate increase in bills that also included higher use as a result of the winter storm.¹ PGE's request also comes at a time when our communities are feeling the pain of price increases across the economy while wages are not keeping up. PGE's past and proposed increases disproportionately impact environmental justice communities and the many other community members already experiencing energy insecurity, and effectively reduce or eliminate the relief that low-income customer discounts offer.²

¹ Portland General Electric customers outraged over new energy prices (Feb. 18, 2024), available at: <https://katu.com/news/local/portland-general-electric-customers-outraged-over-new-energy-prices>; Portland General Electric proposes 2025 rate hike as many still reel from January bump (Feb. 29, 2024), available at: <https://www.opb.org/article/2024/02/29/portland-electric-proposes-2025-rate-hike-as-many-still-reel-from-january-bump/>.

² According to the Oregon Department of Energy, 24% of Multnomah County residents were energy burdened as of 2020. We expect this is likely an undercount given all that has happened during the last four years.

Now is not the time to increase shareholder profits or shift risk to customers. As CUB noted, adjustments in addition to the 2023 rate case have caused PGE customers to see their bills increase by about 1/3 since December 2022. In the context of such steep increases, PGE's request is unreasonable and amounts to too much too soon. As a result, we ask that you please grant CUB's Motion to Dismiss or Segregate Issues. Thank you for considering our concerns.

Sincerely,

/s/ Samantha Hernandez
Healthy Climate Program Director
Oregon Physicians for Social Responsibility

/s/ Siraat Younas
Climate Justice Associate
Community Energy Project

/s/ Brett Baylor, Rick Brown, Linda Craig, Pat DeLaquil, Dan Frye, Debby Garman, KB Mercer, Michael Mitton, Rich Peppers, Rand Schenck, Jane Stackhouse, Joe Stenger and Catherine Thomasson
MCAT Steering Committee

/s/ Jack Watson
Director of Policy and Regulatory Affairs
Oregon Solar + Storage Industries Association

/s/ John Maddalena
Energy Program Manager
Self Enhancement, Inc.

/s/ Carra Sahler
Director
Green Energy Institute at Lewis & Clark Law School

/s/ Anahi Segovia Rodriguez
Energy Justice Coordinator
Verde

/s/ Rose Monahan
Staff Attorney
Sierra Club

/s/ Ana Molina
Advocacy and Systems Director
Oregon Just Transition Alliance

/s/ Nikita Daryanani
Climate and Energy Policy Manager
Coalition of Communities of Color

/s/ Nora Apter
Senior Program Director, Climate
Oregon Environmental Council