

# Oregon Citizens' Utility Board

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April 5, 2024

## *Via Electronic Filing*

Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-108898

**Re: Docket No. UE 435** – Oregon Citizens' Utility Board Reply Brief to Responses to Motion to Dismiss or Segregate Certain Issue

To Whom It May Concern:

Please find enclosed the CUB's Reply Brief in Docket No. UE 435.

Please do not hesitate to contact me via email if you have any questions or need other materials.

Respectfully submitted,

*/s/Jennifer Hill-Hart*

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 435**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY,	)	OREGON CITIZENS' UTILITY BOARD'S REPLY TO RESPONSES TO MOTION TO DISMISS OR SEGREGATE CERTAIN ISSUES
Request for a General Rate Revision.	)	
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**I. INTRODUCTION**

Pursuant to Administrative Law Judge Mape’s March 18, 2024 Ruling, the Oregon Citizens’ Utility Board (CUB) submits its Reply to Responses to CUB’s Motion to Dismiss or Segregate Certain Issues (Motion) in the above-captioned proceeding. CUB reiterates our Motion arguments and incorporates them here by reference.<sup>1</sup>

**II. SUMMARY**

First and foremost, in the Motion, CUB is not arguing that a PGE may not recover prudently incurred costs in customer rates. Rather, as discussed in the Motion, and supported by this Reply, PGE’s tariff filing fails on its face to show that PGE’s proposed rates are just and reasonable. Accordingly, CUB reaffirms its request that the Public Utility Commission of Oregon (Commission) dismiss Advice No. 24-06, UE 435 – Portland General Electric Company’s Request for a General Rate Revision. In the alternative, CUB affirms its requests that the Commission dispose of those issues the Commission just ruled on in UE 416 so that the parties can address only the new costs incurred in the test year.

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<sup>1</sup> UE 435 – Oregon Citizens’ Utility Board, Motion to Dismiss or Segregate Certain Issues, Mar. 14, 2024 (hereinafter “Motion”).

CUB begins by addressing Commission Staff (Staff) and Portland General Electric’s (PGE) assertion that, despite the Commission’s broad authority and discretion over the ratemaking process, it cannot dismiss this proceeding. CUB then addresses Staff and PGE’s arguments that PGE is procedurally entitled to an evidentiary hearing. Next, CUB addresses PGE’s claim that, despite identical issues, the Company is not relitigating the issues just stipulated to UE 416. CUB then addresses PGE’s incorrect claim that CUB has not identified any factual or procedural deficiencies with PGE’s tariff filing that would warrant CUB using the common procedural defense of a motion to dismiss. Responding to Staff and PGE’s arguments, CUB then provides clarification on its alternative motion to segregate certain issues. Finally, CUB concludes by addressing PGE’s argument that the appropriate way to resolve these issues is through “collaboration” and settlement.

### **III. REPLY ARGUMENTS AND AUTHORITIES**

#### **A. The Commission has authority to dismiss a request for general rate revision.**

The Commission’s mission is “[t]o ensure Oregon utility customers have access to safe, reliable, and high quality utility services at just and reasonable rates.”<sup>2</sup> The Commission carries out this duty by establishing just and reasonable rates.<sup>3</sup> Contrary to Staff and PGE’s assertions, it is widely acknowledged that the Commission has the “broadest authority” to determine the method to establish just and reasonable rates.<sup>4</sup>

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<sup>2</sup> Oregon Public Utility Commission, *About Us*, <https://www.oregon.gov/puc/aboutus/Pages/default.aspx> (last visited Apr. 5, 2024).

<sup>3</sup> ORS 756.040(1) (This mission is encapsulated in the Commission’s authorizing statute, which states in part, that “[t]he commission shall balance the interests of the utility investor and the consumer in establishing fair and reasonable rates.”).

<sup>4</sup> *See* ORS 756.040 (“The commission shall balance the interests of the utility investor and the consumer in establishing fair and reasonable rates.”) and ORS 757.210(1)(a) (“The commission may not authorize a rate or schedule or rates that is not fair, just and reasonable.”); *see also* *Duquesne Light Co. v. Barasch*, 488 U.S. 299, 313-315 (1989) (“The economic judgments required in rate proceedings are often hopelessly complex, and do not admit of a single correct result. The Constitution is not designed to arbitrate these economic niceties. Errors to the

PGE argues that CUB does not “cite any statute or case that authorizes the Commission to dismiss a properly filed general rate case at its inception before the development of a record and an opportunity for an evidentiary hearing.”<sup>5</sup> But the Commission’s authority is not so cabined, nor the procedural mechanisms available so enumerated. This supposed line proposed by Staff and PGE, between the procedural mechanisms that the Commission can and cannot use, is illusory. Attempts to draw this line are an empty distraction because every new application of a procedural mechanism used in the process to establish just and reasonable rates could be reframed as a questionable limitation of the Commission’s broad authority. Neither PGE nor Staff have provided the statutory authority that bars the Commission from granting CUB’s Motion.

That said, in recognizing that establishing rates is a quasi-judicial process similar to a civil court proceeding, the Commission has adopted certain procedural rules.<sup>6</sup> The Commission has adopted Oregon Administrative Rules (“OARs”) to govern practice and procedure before the Commission.<sup>7</sup> OAR 860-001-0090(1)(g), for example, reserves the right to grant contested motions to dismiss or other contested motions that involve final determination of the proceedings with the Commissioners rather than delegating the task to the administrative law judge.<sup>8</sup> The Commission has also adopted the Oregon Rules of Civil Procedure (“ORCP”) in contested cases where the ORCPs are not inconsistent with its rules, an order, or a ruling.<sup>9</sup> Pertinent here, ORCP

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detriment of one party may well be canceled out by countervailing errors or allowances in another part of the rate proceeding. The Constitution protects the utility from the net effect of the rate order on its property. Inconsistencies in one aspect of the methodology have no constitutional effect on the utility's property if they are compensated by countervailing factors in some other aspect.”) and *Federal Power Comm’n v. Hope Natural Gas Co.*, 320 U.S. 591, 603 (1944).

<sup>5</sup> PGE Response at 1-2 (March 29, 2024).

<sup>6</sup> OPUC Order No. 08-487 at 5.

<sup>7</sup> OAR 860-001-0000(1).

<sup>8</sup> OPUC Order No. 20-296 at 1.

<sup>9</sup> OAR 860-001-0000(1).

21 provides defenses that may be raised in a motion to dismiss. ORCP 21A provides that a “failure to state ultimate facts sufficient to constitute a claim” is a defense upon which the Commission may dismiss a filing.<sup>10</sup> What CUB has done here, as many parties around the country have done before their respective utility commissions, is use this common procedural defense to request that the commission dismiss this filing. This is not a “harsh remedy” but procedural efficiency. Contrary to PGE’s position, motions to dismiss are commonly raised at the outset of a proceeding to dispose of spurious or faulty pleadings, including those which fail to state facts sufficient to constitute a claim. Neither PGE nor Staff have shown that ORCP 21A is inconsistent with its rules, an order, or a ruling of the Commission.

In sum, the Commission’s broad authority, as envisioned by the Oregon legislature in the Commission’s enabling statute and in the Commission’s adoption of the rules of civil procedure provide that the Commission has the authority to grant CUB’s motion to dismiss PGE’s request for a rate revision in this docket.

**B. PGE’s tariff filing should be dismissed for failing on its face to allege that the proposed rates will be just and reasonable.**

In ruling on a motion to dismiss, the Commission accepts as true all well-plead facts contained in the utility pleadings and supporting testimony to determine whether those facts, and all reasonable inferences therefrom.<sup>11</sup> In a case in which a utility is requesting a change in rates or a schedule of rates—such as a general rate case—the utility bears the burden of showing that its proposed change will result in rates that are fair, just, and reasonable.<sup>12</sup> This requires the

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<sup>10</sup> ORCP 21A(8). Additionally, ORCP 21E provides that any claim or portions of a claim may be stricken if it is “sham, frivolous, irrelevant, or redundant” matter.

<sup>11</sup> OPUC Order No. 15-209 at 4 (citing *IBEW v. Oregon Steel Mills, Inc.*, 168 Or App 101, 104 n 1 (2000), clarified, recalled, clarified, motion denied on other grounds, 180 Or App 265 (2002)).

<sup>12</sup> OPUC Order No. 09-046 at 7 (Feb. 5, 2009).

utility to produce sufficient evidence to support this claim. Accordingly, on a pretrial motion to dismiss, the Commission can dismiss the tariff filing if, on its face, it fails to allege the rates are just and reasonable. As discussed in CUB’s Motion, even assuming as true all factual assertions contained in PGE’s pleadings and supporting testimony, for the following reasons PGE has failed to meet this burden.

**1. PGE has failed to show that its rates implemented the month prior to its filing are not just and reasonable.**

First, PGE has failed to demonstrate that its existing rates, established as just and reasonable just weeks prior to its UE 435 filing, are no longer just and reasonable. In its Response, PGE argues that under current rates the Company will “fall short”.<sup>13</sup> PGE admits, however, that current rates, put into effect weeks prior to its filing, are just and reasonable.<sup>14</sup> Similarly, although PGE claims it is necessary to raise its Return on Equity (ROE) from 9.5% to 9.75%, PGE’s witness testifies that 9.5% remains within the range of a reasonable ROE estimates according to the DCF model, as shown in the table below taken from PGE’s testimony.<sup>15</sup>

**Figure 1  
Summary of Reasonable Ranges at 50% Equity**

	<b>Electric Sample</b>
<b>CAPM/ ECAPM</b>	11.0% to 11.5%
<b>DCF</b>	9.5% to 11.25%
<b>Risk Premium</b>	10.5%

<sup>13</sup> PGE Response at 1.

<sup>14</sup> See PGE/100 Pope-Sims/4:13-21 (The numerous settlements that PGE and the parties in UE 416 were able to reach were approved by the Commission only after they were determined to result in just and reasonable rates.)

<sup>15</sup> See PGE/600 Figueroa - Liddle/17, Fig. 1.

Moreover, while PGE argues that rising capital costs and inflation create the need to increase rates, the Commission *just* considered these factors in determining that an ROE of 9.5% was just and reasonable and those rates only just went into effect the month prior.<sup>16</sup>

While PGE relies on the use of a 2025 test year and increasing costs from inflation as the change in circumstances to justify hauling parties back into settlement, the Commission has already shown that it will not tolerate back-to-back relitigation of claims.<sup>17</sup> The Commission should not permit PGE to waste Commission and party's resources relitigating the issues.

**2. PGE is attempting to relitigate those issues it stipulated to and were found to be just and reasonable just weeks prior to its request at issue.**

In its Response, PGE accuses CUB of wrongly claiming that PGE filed the 2025 GRC to relitigate issues from the UE 416 proceeding.<sup>18</sup> But, as shown in the table in Attachment F, the issues raised in each proceeding are the same. These issues were stipulated to—in good faith settlement—by PGE and found to be just and reasonable agreements by the Commission just weeks before PGE's filing in this docket. The Commission will not approve a stipulation unless it determines it results in just and reasonable rates.<sup>19</sup> PGE has not justified raising these issues again by pointing to any legitimate changed circumstances between when the Commission issued its order finding the rates just and reasonable and PGE's new tariff filing.

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<sup>16</sup> OPUC Order No. 23-386 at 1

<sup>17</sup> For example, in UE 426, Staff's witness suggests it would be appropriate for the Commission to use "ROE as a throttle to control the frequency of general rate cases." As Staff's witness explained "were a utility to file three general rate cases in a five-year period, the Commission might consider that activity sufficient to reduce regulatory lag and reduce financial risk in term of metrics like ratio to cash flow from operations before changes in working capital (CFO-preWC) to debt, in a form meaningful to credit rating agencies." UE 426 - Staff/100 Muldoon/13:7-12. Indeed, as PGE acknowledges, the Commission has also imposed limitations in two other rates cases on the relitigation of ROE within a sixth month window. *See* PGE Response at 10, n. 48. In these instances, the Commission required that the party proposing a different ROE carries "the burden of producing evidence of a material change in the markets, a change in circumstances, or some other good cause to justify an adjustment" to the adopted ROE.

<sup>18</sup> PGE Response at 1.

<sup>19</sup> *See In the Matter of Portland General Electric Company, Detailed Depreciation Study of Electric Utility Properties*, Docket No. UM 2152, Order No. 21-463, at 7 (Dec.15, 2021).

In short, UE 435 is an impermissible collateral attack on UE 416 and should be dismissed. In fact, under the doctrine of preclusion, subsequent applications involving the same facts and issues existing at the time of the first Commission decision, and actually considered by the Commission, need not be relitigated and are rightfully dismissed by the Commission acting in its judicial capacity.<sup>20</sup> The Attorney General has recognized that it is appropriate for an administrative agency to prevent parties from relitigating matters in which the agency acted in a judicial capacity.<sup>21</sup> Comparatively, when the Commission acts in its legislative capacity to consider policy questions, it is not precluded from revisiting those policies, but only when the conditions under which they were adopted have changed.<sup>22</sup>

To avoid dismissing this case as a repeat of last year, PGE continues to rest on its claim that investments in battery storage are a driver of this cases (along with T&D investment).<sup>23</sup> Batteries are a small part of this rate filing. The only battery storage project that *might* be online by the rate effective date is only \$17 million of the total \$202 million the Company has requested. What is more, for that battery storage, PGE is asking only for a tracker, thereby admitting that it might not be used and useful when these rates go into effect. The need for trackers suggests that PGE is trying to rush this case ahead of when the change is needed, again indicating that PGE has failed to meet its burden. CUB does not dispute that PGE has the right to an opportunity to recover its prudently incurred costs of PGE's battery projects. That said, this is not the appropriate time. Dismissing this filing would still allow PGE to file at a later day to recover these costs, and provides that PGE, rather than customers, carry those costs until they are

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<sup>20</sup> See *PEPCO v. Public Service Com.*, 457 A.2d 776, 789 (D.C. 1983) (citing *Stuckey v. Weinberger*, 488 F.2d 904, 911-12 (9th Cir. 1973) (applying res judicata to bar hearings on subsequent applications for disability benefits before the Secretary of Health, Education, and Welfare)). Importantly

<sup>21</sup> OPUC Order No. 15-209 at 3 (citing Or Op Atty Gen OP-6454, 1992 WL 526799, (Or.A.G.), (Jun 8, 1992)).

<sup>22</sup> *Id.* at 3.

<sup>23</sup> PGE Response at 6.



incurred.<sup>24</sup> Utilities are expected to control costs between rate cases. The utilities under the Commission’s regulatory apparatus enjoy a tremendous information asymmetry over Staff and Intervenor and can control the timing of rate cases to maximize profits for their shareholders—absent regulatory intervention. PGE is once again trying to push forward its one-sided rate mechanism policies that heavily benefit shareholders over ratepayers. Rather than request a January 2025 rate change with trackers for the storage projects, the Commission should dismiss this filing and permit PGE to file a case that is timed with the used and usefulness of these new assets.

PGE also disputes CUB’s assertion that the Company’s proposed Investment Recovery Mechanism (IRM) is unbalanced. But the parties are well-acquainted with PGE’s one-sided proposal that it has raised again in this proceeding. The IRM includes nearly all new capital investment – when combined with the Renewable Automatic Adjustment Clause (RAAC), the wildfire mitigation mechanism, and other single issue ratemaking mechanisms, it is unclear what new rate base would not be included. But PGE makes clear that the only depreciation included will be for the elements in the mechanism. All existing rate base will not be included. If we add new rate base, without accounting for depreciation of existing rate base, for ratemaking purposes, PGE will have excess rate base in rates. Accordingly, PGE has not shown that inclusion of the IRM in rates would result in just and reasonable rates.

Finally, the Commission should dismiss this rate filing as it does not balance the interests of shareholders and rate payers. The Commission is required to balance the interests of the utility investor and the consumer in establishing fair and reasonable rates.<sup>25</sup> PGE households’ bills have already gone up by 30% since December 2022. The number of residential customers PGE is

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<sup>24</sup> See also PGE’s many deferral dockets in Attachment D.

<sup>25</sup> ORS § 756.040(1).

disconnecting is growing.<sup>26</sup> When PGE announced its plan in UE 435 to raise rates again, public outcry exploded. As of April 4, 2024, the Commission had received 1,578 comments on this PGE rate case.<sup>27</sup> Similarly, CUB has received comments on the new rate hike from frustrated ratepayers<sup>28</sup> and has 1,264 signatures<sup>29</sup> on CUB's petition to demand that the Commission reject PGE's rate hike. PGE did not share this backlash with its shareholders.<sup>30</sup>

PGE's dismissal of rate shock<sup>31</sup> and affordability as a factor the Commission will consider in setting a utility's revenue requirement rate<sup>32</sup> shows little empathy for the hardship PGE's rate hikes are causing its customers. Moreover, PGE ignores that the Commissions has identified tools to address rate shock in tariff filings.<sup>33</sup> The entity that is best able to address rate shock and affordability, however, is the utility. The utility has visibility into all of the cost drivers, controls investment decisions, and the timing of general rate cases and most single-issue rate cases.<sup>34</sup> But a utility has an incentive to make investments, which will bring in additional ROE to its shareholders. Considering the 18% increase in January of 2024, skyrocketing bills, and heavy outcry from customers,<sup>35</sup> it is difficult to believe that raising the rates another 7.8% in 2025 could possibly provide the balance required of a just and reasonable rate.

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<sup>26</sup> See Attachment C.

<sup>27</sup> UE 435 - Public Comments, <https://apps.puc.state.or.us/docketpubliccommentreport?DocketID=24011> (last visited Apr. 4, 2024).

<sup>28</sup> See Attachment B.

<sup>29</sup> See Attachment G.

<sup>30</sup> See Attachment E.

<sup>31</sup> In the context of utilities, rate shock occurs when there is a sudden, large rate increase which is significant enough that customers find it difficult to adjust their budgets to absorb the increase. Customers are feeling financial pressures from the rising cost of essentials: housing, energy, food, medicine, medical bills, childcare and transportation. UE 426 - CUB/100 Jenks/8:16-21.

<sup>32</sup> PGE Response at 9.

<sup>33</sup> UE 426/CUB/103.

<sup>34</sup> See PGE's current deferrals in Attachment D.

<sup>35</sup> See Attachments A, B, and G.

**C. In the Alternative, the Commission Should Segregate or Dispose of Certain Issues outlined in the Motion.**

In the Motion, CUB requested that, should the Commission deny CUB's Motion to Dismiss, the Commission exercise its authority to segregate certain issues from the proceeding. The focus of this request was on issues that have either already been examined in prior rate cases or are fundamentally imbalanced and therefore unlikely to lead to just and reasonable rates. If granted, CUB envisioned that the alternative motion to segregate would remove the problematic issues from the proceeding, allowing them to be addressed in a separate process such as a public meeting. In making this request, however, it is clear that Staff and PGE misinterpreted CUB's alternative motion. Accordingly, CUB provides the following two clarifications.

The purpose of segregating issues was to allow for a shorter, easier process by removing those issues which were already raised in UE 416 (ROE, IRM, RAAC, etc.). In this respect, it was CUB's intent to get to the bread-and-butter revenue costs, i.e., those new costs that were incurred in the test year.

CUB recognizes that the Commission has broad authority to determine the process of a rate case. While CUB suggested including the items not addressed in the rate case in a public meeting, this was only intended to be an example of a vehicle, not the definitive alternative. Accordingly, CUB welcomes other mechanisms to dispose of the issues discussed in the Alternative Motion to Segregate that that have either already been examined in prior rate cases or are fundamentally imbalanced.

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**A. Filing a tariff does not entitle PGE to an evidentiary hearing.**

1. ORS 757.210 does not require the Commission to conduct an evidentiary hearing nor establish a statutory period to request a hearing.

On its face, the plain language of ORS 757.210 does not require a hearing when a utility files a tariff, nor could any statutory language absolve the Commission of its authority to establish just and reasonable rates. The Commission’s broad authority and discretion to interpret statutory terms to fit within its comprehensive and flexible regulatory scheme is well-documented.

Statutory interpretation requires discerning the intent of the legislature.<sup>36</sup> The first step in doing so is examining “both the text and context of the statute.”<sup>37</sup> If the legislature's intent is not clear from the text and context inquiry, the next step is considering legislative history.<sup>38</sup> If legislative intent is still unclear, the next step is to apply maxims of statutory construction.<sup>39</sup> In *State of Oregon v. Gaines*, the Oregon Supreme Court stated:

there is no more persuasive evidence of the intent of the legislature than “the words by which the legislature undertook to give expression to its wishes.” *State ex rel Cox v. Wilson*, 277 Or 747, 750, 562 P2d 172 (1977) (quoting *U.S. v. American Trucking Ass'ns.*, 310 US 534, 542-44, 60 S Ct 1059, 84 L Ed 1345 (1940)). Only the text of a statute receives the consideration and approval of a majority of the members of the legislature, as required to have the effect of law. Or Const, Art IV, § 25. The formal requirements of lawmaking produce the best source from which to discern the legislature’s intent, for it is not the intent of the individual legislators that governs, but the intent of the legislature as formally enacted into law.<sup>40</sup>

Under Oregon law, the text and context of the statute in question are given the primary weight in the three step *State v. Gaines* statutory interpretation process.<sup>41</sup> When examining a statute’s text

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<sup>36</sup> *Portland Gen. Elec. Co. v. Bureau of Labor & Indus.*, 317 Or 606, 610 (1993) citing ORS § 174.020.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.* at 611.

<sup>39</sup> *Id.* at 612.

<sup>40</sup> *State v. Gaines*, 346 Or 160, 171 (2009).

<sup>41</sup> *In re Portland General Electric Company, Application for Transportation Electrification Programs*, OPUC Docket No. UM 1811, Order No. 18-054 at 7 (Feb. 16, 2018); *in re PacifiCorp, dba Pacific Power, Petition for Declaratory Ruling Regarding ORS 757.480*, OPUC Docket No. DR 47, Order No. 14-254 at 4 (Jul. 8, 2014).

and context, the Commission gives words of common usage “their plain, natural, and ordinary meaning.”<sup>42</sup> The language in ORS 757.210 is clear that the Commission has the discretion to conduct a hearing.

In their reading of ORS 757.210(1)(a), PGE and Staff argue that the statute requires the Commission to conduct a hearing when a public utility files a tariff.<sup>43</sup> This is incorrect. ORS 757.210(1)(a) provides:

Whenever any public utility files with the Public Utility Commission any rate or schedule of rates stating or establishing a new rate or schedule of rates or increasing an existing rate or schedule of rates, **the commission may**, either upon written complaint or upon the commission’s own initiative, after reasonable notice, conduct a hearing to determine whether the rate or schedule is fair, just and reasonable. The commission shall conduct the hearing upon written complaint filed by the utility, its customer or customers, or any other proper party within 60 days of the utility’s filing; provided that no hearing need be held if the particular rate change is the result of an automatic adjustment clause. At the hearing the utility shall bear the burden of showing that the rate or schedule of rates proposed to be established or increased or changed is fair, just and reasonable. The commission may not authorize a rate or schedule of rates that is not fair, just and reasonable.<sup>44</sup>

The legislature began the above paragraph by providing the Commission with discretion over its administrative process (“**the commission may, either upon written complaint or upon the commission’s own initiative,...**”). This first sentence establishes a discretionary hearing, which the Commission can initiate either on its own decisions or initiate through a written request by a party. The second sentence refers to this discretionary hearing and establishes a timeline should the Commission elect to hold a hearing upon the written complaint of a party.

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<sup>42</sup> OPUC Order No. 14-254 at 4 citing *Portland Gen. Elec. Co. v. Bureau of Labor & Indus.*, 317 Or 606, 859 (1993).

<sup>43</sup> PGE Response at 5 (Moreover, contrary to PGE’s arguments, the term “hearing” has not been defined as an evidentiary hearing); Staff Response at 2:12-14 (“Whenever a utility files a tariff under ORS 757.205, the Commission has discretion to conduct a hearing to determine whether rates filed are ‘fair, just and reasonable.’ But, when asked to do so by written complaint within 60 days of a tariff filing, the Commission must conduct such a hearing unless the proposed rate change is part of an automatic adjustment clause.”) and 2:19-20 (“ORS 757.210(1) requires the Commission to conduct a hearing on a rate filing upon written complaint filed by the utility, its customer or customers, or any other proper party within 60 days of the utility’s filing.”).

<sup>44</sup> ORS 757.210(1)(a) (emphasis added).

This is evidenced by the fact that this sentence follows the first and that the legislature refers to “the hearing” in the second sentence, a reference to the discretionary hearing of the first sentence (referenced as “a hearing” and noted in bold above). Similarly, we can see that the third sentence follows this framework, stating that the utility has the burden at “the hearing.” In other words, the first sentence provides for the possibility of a hearing, and the second and third sentences provide procedural parameters on that hearing once elected. In sum, ORS 757.210(1)(a) provides that if the Commission, in its discretion, decides to conduct a hearing upon the written request of a party, it must conduct that hearing within 60 days of the utility’s rate filing. The Commission, however, is not *required* to conduct a hearing upon the written complaint of a party. Reading a hearing requirement into the statute would nullify the Commission’s discretion established within that first sentence.

Similarly, Staff’s conclusion that it would be improper for the Commission to dismiss PGE’s rate filing “before the statutory 60-day period ended or when the utility, a customer, or any other proper party has asked the Commission to hold a hearing” is flawed.<sup>45</sup> As discussed above, the Commission has discretion over whether to conduct a hearing. The statute does not establish a “60-day period” before the Commission may exercise that discretion. In this regard, though PGE requests a hearing in its response to CUB’s Motion, the plain language of ORS 757.210 provides the Commission still has the discretion to decide whether it will initiate a hearing.

Finally, PGE states that, “through this filing PGE formally requests a hearing under ORS 757.210 on all issues in its 2025 GRC.”<sup>46</sup> This is not the proper procedure. ORS 757.210 requires the utility to file a written complaint, not simply state its request or generally give notice. ORS

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<sup>45</sup> See Staff Response at 3:1-6.

<sup>46</sup> PGE Response at 5.

756.500 and 756.512 address the process for a complaint, requiring more than a notice or request for hearing.<sup>47</sup> PGE's request is procedurally improper.

2. Order No. 24-061 is a suspension order, which also does not guarantee an evidentiary hearing.

PGE argues that Order No. 24-061 establishes an evidentiary hearing in this docket.<sup>48</sup> But Order No. 24-061 is a suspension order, not an order establishing hearing.<sup>49</sup> The plain language of Order No. 24-061 suspends Advice No. 24-06 upon finding that good and sufficient cause exists to investigate the propriety and reasonableness of the tariff sheets.<sup>50</sup> This standard suspension order provides the Commission with the time to review the filing, nothing more. Just because the Commission has suspended the tariff does not mean it must initiate a hearing. Rather, such an order entertains resolving the matter equally through a public meeting, stipulation, hearing, dismissal, or other mechanism established in the Commission's broad discretion to determine just and reasonable rates.

**B. The Commission should dismiss this filing rather than force Staff and Intervenors into settlement discussions with a company that does not negotiate in good faith.**

CUB, Intervenors, Staff, and PGE just spent nine months litigating the same rate requests that PGE has included in UE 435. Asking for these items again is a waste of time and resources and counter to the judicial efficiency encouraged by settlement, especially when nothing has changed. A rate filing takes time to put together. Given the timing of PGE's filing of UE 435, it is clear that, while stipulating that the rates that Staff and Intervenors had spent months litigating

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<sup>47</sup> See ORS 756.500.

<sup>48</sup> PGE Response at 5.

<sup>49</sup> OPUC Order No. 24-061.

<sup>50</sup> *Id.*

in UE 416 were just and reasonable, behind the scenes PGE was simultaneously working on its UE 435 proposal for a rate increase. Moreover, PGE knows that Staff and Intervenors are dealing with four large and complex rate cases as well as many other regulatory proceedings this year. Just weeks after the settlement was adopted in UE 416, and after the other rate cases were filed, PGE, knowing that our resources are much more spread out is taking advantage of the workload of CUB and other parties when PGE could easily delay its filing to a more appropriate time, carrying its burden of controlling costs rather than putting it on Staff and Intervenors, and most importantly: its customers. This is inequitable.

Although PGE urges the Commission to stick with the traditional framework of settlement and hearing, PGE did not negotiate UE 416 in good faith. Moreover, PGE's calls to address these issues outside of motions or the media show that the Company is not interested in hearing from ratepayers. This strategy creates a huge disincentive to settle issues. "Fool me once shame on you, fool me twice, shame on me." PGE admits in its response and actions that it does not consider the stipulations binding. How can parties go into this next settlement conference unable to trust the utility?

#### **IV. CONCLUSION**

CUB continues to appreciate the Commission and Commission Staff's diligent efforts in the face of compounding rate cases, and respectfully request the Commission dismiss or segregate the issues. PGE bears the burden of showing that its proposed change will result in rates that are fair, just, and reasonable. As discussed above, PGE's tariff filing on its face is far from just and reasonable. The Commission has the authority to dismiss PGE's tariff filing and may do so at this pretrial stage. Moreover, such a dismissal would save parties from litigating for another nine months the same rate requests. CUB does not deny that PGE can bring a rate case of



its prudently incurred cost, or even determine a mechanism to manage the increasing costs to meet the state's clean energy goals, but these rate filings must be balanced.

Dated this 5<sup>th</sup> day of April.

Respectfully submitted,

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# **Attachment A**



ENVIRONMENT

## 5 takeaways: Why are Oregon power rates going up so fast?

Updated: Mar. 10, 2024, 11:10 a.m. | Published: Mar. 10, 2024, 6:00 a.m.



Portland General Electric buys the power from this solar farm outside Christmas Valley to meet its requirements for clean energy under Oregon's renewable energy mandates. A spate of recent rate increases has many of the utility's customers up in arms. LC- The Oregonian Attachment A 3  
Dry winter sparks concern for wildfire seas



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By [Gosia Wozniacka | The Oregonian/OregonLive](#)

Another rate increase proposed by Portland General Electric last week has many customers up in arms, wondering how they're going to afford paying their bills. If approved by the Oregon Public Utility Commission, it would add up to about a 40% increase in PGE's power rates since January 2022.

Pacific Power customers are also feeling the pain. If the utility's latest rate proposal is approved, they're looking at a 50% increase since January 2023.

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And Idaho Power is seeking to raise rates by nearly 27% for its eastern Oregon customers.

The steep increases have taken many power customers by surprise.

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“People are so frustrated they don’t know what to do,” said Andy Veitch, a retiree in Aurora whose January bill was \$527 and who lives on Social Security with his wife in an old, poorly insulated house. “It’s over the top. I think PGE is oblivious to the average middle-class elderly person.”

“We have no recourse. Food prices are higher, gasoline prices are higher and electric prices are going up,” Veitch, 76, said. “I don’t know how folks can survive. It’s unsustainable.”

Some have taken to social media to circulate a petition asking state lawmakers to limit future rate increases and to enact stricter regulations and transparency standards for utilities.

The Oregonian/OregonLive interviewed Bob Jenks, the executive director of the Oregon Citizens' Utility Board, on the Beat Check podcast about the reasons for the recent rate increases.

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The citizens board is a nonprofit organization created via a 1984 ballot measure to advocate for all state utility customers.

Here are five takeaways from the interview.

### **BIG BILLS EXPLAINED**

PGE's rates went up 12% in January 2023 and by 18% this January. PGE has proposed another 7.4% increase that would go into effect next January. The utility's request will likely grow once PGE files to recover other costs, including those for wildfire mitigation and the winter storm, Jenks said.

The Public Utility Commission said the PGE increase that went into effect Jan. 1 would raise monthly bills by \$24.59 for a single-family home using an average of 795 kilowatt hours a month.

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But some PGE customers saw big January bills of \$500 or even \$1,000 with what appeared to be a much higher increase.

There are several explanations. For one, the increase coincided with extremely cold weather.

The Portland metro area and outlying regions experienced a multi-day winter storm in January that probably raised people's overall energy use, said PGE spokesperson Drew Hanson. That's because it takes a lot more energy to heat a home when the temperature drops – even if the thermostat isn't turned up higher.

This is especially a problem for homes with poor insulation or leaky windows and doors that get especially chilly during cold spells.

“When the weather gets really cold, your bill goes up by a lot,” Jenks said. “It takes a lot more energy to heat your home when it's 20 degrees out than when it's 40 or 50 degrees. So when you have a cold spell like we did for a week in January, bills are going to shoot up. You add to that an 18% rate increase and it becomes really difficult.”



Some PGE customers also complained that their energy bills appeared to go up by a lot more than 18%.

Jenks said PGE's "really poor" explanation of charges on customer bills makes it difficult to understand the rate hike's impact.

While it's true that the energy, transmission and distribution charges went up by a lot more than 18% for some customers, one line item – called Schedule 125 or the annual power cost update – went down to zero, meaning the final increase was still 18%.

"I've been doing this for decades and I had to create a spreadsheet to get to that answer," Jenks said. "We shouldn't ever be in a situation where customers need a spreadsheet to understand what they're being charged by a utility. That's just insane."

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PGE's Hanson said the company recently added new resources on its website to help customers understand what is on their bill.

## **IT'S CLIMATE CHANGE**

One of the major factors that's pushing up rates is climate change.

In addition to higher energy use for customers during cold snaps and extreme heat events, the changing climate is also affecting wholesale energy prices. Because wind and solar are not always reliable energy sources and battery storage is still a nascent concept, energy supply is often tight during extreme weather events.

This means energy prices rise exponentially during high-demand periods – a cost that eventually is passed on to customers.

Climate change also affects utility equipment.

During January's snow and ice storm, hundreds of large trees toppled in the Portland area, bringing down or uprooting more than 850 PGE distribution power lines, causing outages for approximately 440,000 customers. PGE has said it spent more than \$30 million on outage repair and restoration to recover from that storm – an estimate that's likely to grow. The utility will eventually seek to recover those costs from ratepayers.

As the climate gets hotter and drier, utility wires also are causing more wildfires. Multiple utilities across the West in Oregon, California, Hawaii and Colorado now face billions of dollars in damages over their failures to prepare, leading to catastrophic wildfires.

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Many utilities are now spending millions on trimming trees and vegetation near power lines, burying power lines, investing in better weather monitoring and other measures to harden their equipment and prevent wildfires.

“There’s a lot of investment that they’re trying to make to prevent those wildfires because their systems are really, really dangerous in the environment and in the climate that we have today,” Jenks said.

Wildfire mitigation is the biggest driver of Pacific Power’s proposed rate increase – it includes a proposed “Catastrophic Fire Fund” to cover the utility’s liability for wildfires. A jury in Oregon has found the company was grossly negligent and reckless, awarding millions in damages.

Pacific Power residential customers have already seen two double digit increases and likely will see a third one next year. In January 2023, their bills went up by 21%; this January, they rose by 12.9%; and last month Pacific Power proposed a 17.9% rate hike that would go into effect next January.

One of the big questions is whether customers should pay the wildfire litigation bill, Jenks said.

“There’s a fundamental question whether it’s legal to charge customers for those damages,” he said. “If a court puts punitive damages on a company and that company is just allowed by regulators to pass those punitive damages on to customers, who’s being punished?”

### **CLEAN ENERGY PRESSURES**

Oregon law requires PGE and Pacific Power to reduce their carbon emissions by 80% by 2030 and 100% by 2040. This means getting rid of coal and natural gas and relying 100% on renewable energy sources such as solar and wind.

In addition, new demand – from electric cars, home heating and data centers – will bring additional loads and further increase the need for clean energy.

Utilities project that meeting the state mandates and new loads will require massive new investments. So they're spending more money on new transmission lines, wind turbines, solar farms and battery storage projects – and asking to recover those costs in rates.

PGE's January increase, for instance, "reflects the need to invest in the reliability and resiliency of PGE's system, advance policy objectives like equity and clean energy, and the reality that PGE faces inflationary pressures and high market power prices," Public Utility Commission Chair Megan Decker said in a statement.

While some clean energy investments will push up rates, Jenks said, others can lower them.

This year, for example, PGE brought on a new wind farm in Montana. Because it's producing power when there's no wind in Oregon and knocking out expensive purchase power costs, its overall impact is to lower rates.

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Also, due to the volatility of natural gas costs in recent years and the high cost of retrofitting and cleaning up coal-powered plants, “it’s almost assured that serving new (electric) loads with renewable energy is going to be cheaper than (the fossil fuel) alternative,” Jenks said.

One of the biggest worries, according to Jenks, isn’t the transition to clean energy – but rather, increased demand for energy use from data centers, which will consume dramatically more energy than power planners had anticipated.

The citizens board believes those server farms, owned by big companies like Amazon and Facebook, should pay the full costs for their energy and infrastructure investments, said Jenks, and residential customers shouldn’t have to subsidize them.

## **ENERGY EFFICIENCY IS KEY**

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One of the keys to reducing customer bills and making more space on the grid is energy efficiency, Jenks said.

The average household uses over 20% less electricity today than it did a few decades ago, he said, and that downward trend must continue. This can be accomplished by swapping newer, more efficient furnaces for older ones and by converting natural gas furnaces to electric heat pumps.

But it's equally important to convert electric resistance heaters like baseboard heaters – which are extremely inefficient – to electric heat pumps.

Retrofitting and insulating homes is another way to reduce energy costs. According to the U.S. Department of Energy, insulation retrofits in residential buildings can save homeowners up to 15% on heating and cooling costs.

“When you upgrade your home, when you invest in energy efficiency, your bill directly goes down and your comfort level goes up,” Jenks said. “So investing in energy efficiency is going to be one of the keys to meeting our climate challenges in an affordable manner. It’s the best bang for the buck that we got out there in our energy systems.”



Tax credits under the Inflation Reduction Act kicked in earlier this year, allowing taxpayers to shave a few thousand dollars off the cost of a heat pump, home insulation or other energy efficiency projects.

The much-awaited federal home electrification and efficiency rebates – which would allow some lower-income households to defray the entire cost of a heat pump, electric appliance or home retrofit – won't be available until later this year and will benefit relatively few Oregonians.

## **REGULATORY WOES**

There's a conundrum at the heart of how investor-owned utilities operate, Jenks said: They have an incentive to spend money because their profits come from making capital investments. And the Oregon Public Utility Commission must allow them the opportunity to earn a "reasonable return."

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One issue, said Jenks, is that the rate-setting mechanism has changed, to the detriment of customer affordability. In the past, regulators would set a utility's rate by considering the overall cost of providing service, profits and other factors. The utility wouldn't ask for a new rate until cost increases started to erode its profit margins, he said.

Now, he said, utilities are focused on immediate cost recovery for single issues such as the January winter storm or wildfire mitigation costs.

The utilities also are allowed to update some costs even after the Public Utility Commission has issued a final order – meaning, the commission doesn't know the final price increase when it makes a decision in a rate case.

And, utilities are allowed to keep some information confidential: For example, when PGE updates its power cost forecasts, it designates the expected price increase as confidential, Jenks said.

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As part of its latest rate increase proposal, PGE also has proposed a new policy that would guarantee the utility can charge customers for billions of dollars in new investments every January. It would shorten the process to review proposed increases and prevent scrutiny of investor earnings.

PGE declined to comment on those specific issues.

But it has pushed back on the general idea that it's allowing costs to balloon.

"PGE is focused on managing spending and keeping operating costs low," said Hanson, the PGE spokesperson. "We have managed increased energy demand and infrastructure investments with the same number of employees year over year and implemented new technologies that result in savings."

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Other solutions exist, Jenks said. Utilities can reduce the number of rate requests. The Public Utility Commission could tell a utility to delay certain expenses or take cost-cutting measures.

It also could delay rate increases. Typically, Jenks said, utilities raise rates in the winter.

“We’ve been warning the commission for years that one of these times we’re going to have a big rate change that’s also going to come at a time of an arctic chill,” Jenks said. “And it’s going to have devastating impacts on customers.”

Customers like Veitch, the Aurora retiree, said that moment has arrived.

The Public Utility Commission’s Decker acknowledged as much.

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“We recognize how significant this rate increase will be for families and businesses,” she said, “and we encourage them to seek out help with bills through energy efficiency and the rate discount program.”

Lower income customers can apply for income-qualified utility bill discount programs. PGE has just expanded its [bill discount program](#) to provide up to a 60% monthly energy discount to customers who qualify. Pacific Power has a [similar program](#) as does [NW Natural](#).

— *Gosia Wozniacka covers environmental justice, climate change, the clean energy transition and other environmental issues. Reach her at [gwozniacka@oregonian.com](mailto:gwozniacka@oregonian.com) or 971-421-3154.*

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## Around the Web

## Consumer advocacy group looks to change how utilities' rates are regulated in Oregon

by Christina Giardinelli, KATU Staff

Wed, March 27th 2024 at 5:52 PM

Updated Wed, March 27th 2024 at 6:10 PM



(KATU)

PORTLAND, Ore. (KATU) — Utility affordability in Oregon is on the decline, according to a state-by-state comparison published by the national Citizen's Utility Commission (CUB).

The consumer advocacy group published a state-by-state utility comparison in **2021** and one in **2022**. The review placed Oregon in fourth place nationwide for affordability in 2021, dropping it to ninth place in 2022.

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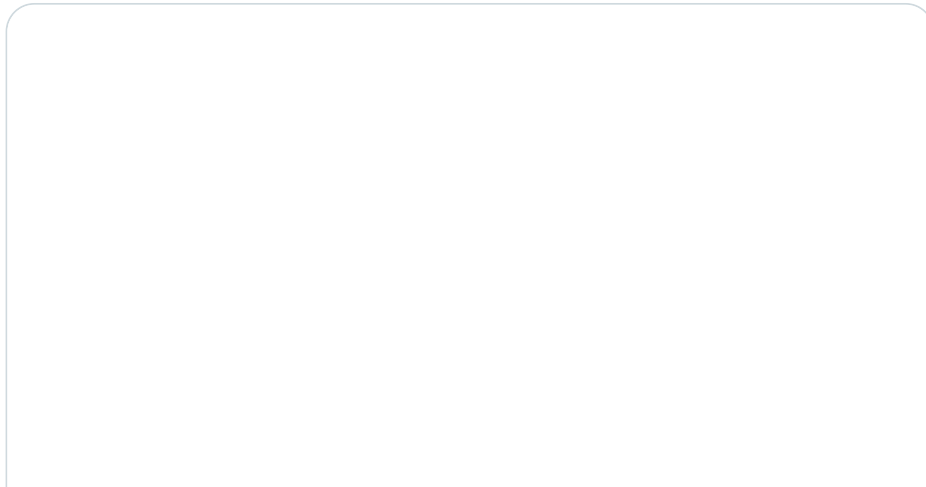
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**Christina Giardinelli**

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"Idaho Power is proposing a 27% rate increase; we have PacifiCorp proposing a 22% rate increase; PGE just did an 18% one and is following that up with a 7% rate increase. Our customers can't afford this. We do have an affordability problem," said Bob Jenks, executive director for Oregon CUB.

Oregon CUB is authorized to intervene in rate increase cases, which are adjudicated by the Public Utilities Commission (PUC), which, in the absence of a competitive free market when it comes to utilities, is tasked with assuring rate increases are "just" and "reasonable."

## 2nd teenage boy found shot dead along I-5 identified

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Jenks believes that definition should include an affordability consideration and says PUC should implement stopgap measures to mitigate impacts to consumers when rate increases are above a certain percentage.

"There is a series of things the commission can do to lower these increases that will make a big difference to customers, including things like phasing in some of that rate increase over a couple of years. One of the big things the commission can do is simply move these rate cases out of the wind," he said.

The effective date for PGE's rate increase was Jan. 1, which coincided with some of the lowest temperatures of the year so far, and bill spikes that were considerably high for some customers.

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raise rates in the spring," Jenks said, adding that the commission also has the ability to push the utilities profit margin to the lowest allowable amount in order to mitigate costs to consumers when rate increases are exceedingly high.

He said CUB is asking the commission to put stopgap measures in place if rates go up any more than 7% plus inflation or 10% overall.

PUC was not immediately available for an interview but sent a written statement.

"Recently many questions have been asked about the role of the Oregon Public Utility Commission (PUC) in ensuring that electricity rates remain affordable for customers," it reads in part. "As we previously noted in a report to the legislature, under the agency's existing authority, the PUC's legal mandate is to set "just and reasonable" rates that reflect utility operating costs and the opportunity for a fair return on capital investments. Although subject to regulation, investor-owned utilities remain private enterprises. Governmental regulation has implied limits that preserve the private rights of these businesses."

Jenks said CUB's proposals to PUC will be made in individual rate increase cases. If those proposals are not implemented, he said they will take the issue up with the Legislature ahead of the 2025 legislative session.

Members of the public who want to let PUC know how they feel about this issue and about individual rate increase cases can comment in writing or during public comment sections of PUC's meetings.

You can find those [here](#).

PUC's full statement below:

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*affordable for customers. As we previously noted in a report to the legislature, under the agency's existing authority, the PUC's legal mandate is to set "just and reasonable" rates that reflect utility operating costs and the opportunity for a fair return on capital investments. Although subject to regulation, investor-owned utilities remain private enterprises. Governmental regulation has implied limits that preserve the private rights of these businesses.*

*The PUC has many regulatory mechanisms to ensure that utilities use a least-cost, least-risk approach to operating and investing in the system and promotes other mechanisms (like energy efficiency incentives) to help customers reduce their electricity bills. The PUC's approach to regulation may seek to produce low rates and bills, but the PUC's core legal mandate is to set rates that are "just and reasonable," not to make sure rates remain at a certain level or have an equal affordability impact on all customers. For more information, please see SB 978 Report to the Legislature (2018)*



**READ THE COMMENTS (37)**

*In that report, the PUC recommended legislative action to address affordability. In 2021, the legislature passed HB 2475 to provide the PUC new authority to set differentiated rates for low income and energy burdened customers. That bill allows the PUC to consider "differential energy burdens on low-income customers and other economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers." Under this new authority, the PUC has approved interim differential rates for five of the six energy utilities (PGE, PacifiCorp, NW Natural, Cascade Natural Gas, and Avista), and is currently working with Idaho Power on a proposal to provide interim low-income relief to its Oregon customers. The PUC is also working with stakeholders and utilities to develop long-term rates to address differential energy burden and factors that affect affordability for certain classes of utility customers."*

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**Fishin50** ...

27 March, 2024

Consumer Advocacy? Well I am an electricity consumer. I listened to GOOD advice after tinkering with solar for many decades. I decided to get it. Hey guess what naysayers it really regulates the rates. \$13 a month. That really a great rate to keep it regulated at. Anyone that claims it doesn't work or isn't worth it do not know what they are talking about.

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**cliffclavin49** ...

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have wires run to my house even if I never ever use one cent worth of electricity, it goes up every year because the cost of wire, fuel, labor, vehicles, and everything else associated with the grid keeps going up. I have always produced more electricity than I use but it doesn't take into account the facilities charges.

👍 1 🗨️ • Share

**Fishin50**

28 March, 2024

My Net metering agreement is what made our very stable. Wind added to your may effected it and mine is PGE Net metering agreement. It was \$12 something for years and recently went to \$13. I never read reasoning for increase. Have a great day.

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**cliffclavin49**

28 March, 2024

The reason that your facilities charge is less is that you live in a larger population density so each pole and mile of wire is shared by many different folks.

My closest neighbor is about a mile away. There are 16 poles and a mile of wire that someone has to pay for. The electricity stops at my place cause there is no one living past us except elk, deer, and lots of rabbits.

👍 🗨️ • Share

**Fishin50**

28 March, 2024

Replying to cliffclavin49

I think the difference is the Net metering agreement. But I understand your statement. Who is your PUD or power company? Is it a PGE Netmtr agreement?

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**cliffclavin49**

29 March, 2024

Replying to Fishin50

Touchstone.

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**McTwister**

27 March, 2024

I have a great southern roof exposure, a lot of it. I'm interested in learning more from someone who isn't trying to sell a system. I have basic understanding, an inverter, battery array, perhaps a transfer switch (manual or auto), secondary power source. Sun track or stationary panels? I want to learn from people that have some experience, not the phonies online.

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**Fishin50**

27 March, 2024

Gotcha. I have a friend that I met when he set up and planned our system but I am more than happy to try and answer your questions publicly here because it's great technology and to be honest pretty old technology. All phones satellites tv cable other global communications use solar power to keep us connected. Internet too.

Most solar systems don't need batteries unless you're in a location where power will cost more to have established to your property line. It's called Grid-Tie. Meaning when sun comes up about 630-7 currently the panels start making DC voltage. That activated the relays and inverters and starts making power for the day even when rainy or cloudy obviously in full sun they produce more. When Bryan came here he had a laptop with software that tells us exactly how much at what angle etc the sun would have produced etc.

South is the key as you have stated.

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**Fishin50**

27 March, 2024

Batteries are used for remote places where it is way more expensive to have power lines extended or just a small camp etc.

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**Fishin50**

27 March, 2024

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pump. Crank the Air and heat pending on season. It's one of best investments ever made. I planned on doing it from day one of buying this home new about 25 years ago. You get tax credit and use it to reduce cost of entire system can finance or pay cash for the equipment and install . Our German Inverters have 20 year from install date warranty. I really don't care if cost me a little after 20 to repair a part in inverters because they are only thing that will wear out besides relays potentially. But our power was about \$10,000 every 3 years now it's about \$450 every 3 years.

2

\$250-300 monthly compared to \$13

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**cliffclavin49**

28 March, 2024

Replying to Fishin50

My house is run by a computer that I programmed. It has been like that for over 40 years. I have upgraded the components as better options came along but I depend in heating and cooling with fans most of the time.

In the summer time I use exhaust fans to scour out the house of hot air and pull in the cool night air. Cost is 2.3 amps per hour. My central air is about 16 amps per hour so I save a lot of money.

In the winter I have ceiling fans and duct fans that pull the warm air in the upper part of the house to the lower levels of the house. Fans are cheap to run.

All of it is controlled automatically by the computer.

👍👎 • Share

**Fishin50**

28 March, 2024

Replying to cliffclavin49

👍👍 smart I have dreamed up all sorts of that same exact idea but new house works good. Ranch place would be cool to do all that but just dress

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**cliffclavin49**

29 March, 2024

Replying to Fishin50

My place is so efficient that at -40°F the place stays at 45°F without heat. In the summer it gets to 110°F and the place never gets above 75°F without air conditioning.

I use Earth heating and cooling which only requires a pump to pump the water. At 10 feet it is about 65°F year round. That is heat...

**See more**

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**cliffclavin49**

28 March, 2024

Electric rates in Oregon are some of the lowest in the US.

The reason for the increases is due to plants shutting down because of laws passed by Congress, the opposite of Progress. As more and more plants shut down expect rates to go up even more.

It is called supply and demand and was taught to me in 8th grade.

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**McTwister**

28 March, 2024

If only we could bring back our one coal plant that shut down and get rid of the many wind farms. That would be progress! People complain about the aging infrastructure of our power system but then complain when THEY have to spend money to fix it. Hard to win with some people.

*(Edited)*

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**Fishin50**

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sooner or later they have to also increase rates because executives and an employees and equipment etc cost goes up but the more Solar the less profit. Mercury is the issue with Coal. It's not as much CO2. I worked in Government that regulates this exact topic. Natural Gas emits Formaldehyde so when uneducated people flip their lips about how none of the older energy sources don't hurt anything I just try to educate them and sooner or later I give up because they will never get it. I am not talking about you. I think you're a really smart person. I am referring to the knuckleheads that are extremist and won't read up on anything they say they know so much about.

👍 🗨️ • Share

**Clack54**

27 March, 2024

More emphasis on reliable power sources like coal, natural gas and hydro-electric, and less emphasis on expensive large solar and wind turbine sources would drive prices down. Let's let power companies do what they really do best - generate electricity - and get government green energy mandates out of the way.

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**Independentbychoice**

28 March, 2024

In many cases, the producers are shutting down plants because they are more expensive than the alternative.

👍 🗨️ • Share

**Fishin50**

29 March, 2024

You are completely not understanding the difference in Toxic Substances and inert ways of generating and producing power. Many smart people caught on. Many of the Solar Farms are private people that are getting ahead currently and not poisoning Air, water and land but whatever. If people want cancer and mercury poisoning etc the sad fact of the matter is it's not only themselves that are exposed it's everyone on earth as well as critters. The cost can be low for consumers but they need to open their eyes and mind to the fact and realize there is clean sources of energy available to all of us. The power companies will always generate power. If people do it themselves their own cost gets very affordable.

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**MC TWISTER**

28 March, 2024

Yep, solar and wind are unreliable, we could run out of them at any moment.

👍 2 🗨️ 2 • Share

**Fishin50**

28 March, 2024

Wind is good too but Solar is a little more constant in long run. The combo is great though. They will both pay for themselves. Wind technology is cool. One can make the equipment if just have the will an open mind and follow plans. Windings etc pretty simple. Alternators etc are very reliable. Look at a weather station. Can use stainless round bowls for the blade essentially and will always rotate same direction no matter which direction wind blows. Can utilize bicycle crank and chain sprocket gear ratios etc belt on wheel without tire.. spinning alternator. Use your inventive mind in conjunction with imagination and previous knowledge.

👍 🗨️ • Share

**Fishin50**

29 March, 2024



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**TheDad**

27 March, 2024

The water bills here are totally insane. I paid \$30 a month for water in the Mojave desert, here i average \$110 a month.. in a rain forest next to a snow capped mountain and the country's 8th largest river

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**Fishin50**

29 March, 2024

I agree with your statement. Many municipalities really charge you for sewer treatment based on the water consumption which is an approximation not 100% accurate. If could effectively monitor actual sewage at each property easily like water is metered it may be a more fair assessment of sewer costs.

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**McTwister**

28 March, 2024

BTW, my water and sewer bill at home is \$0. I have a well and a septic tank.

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**Fishin50**

29 March, 2024

I get your point but water costs power and maintenance on well ( lucky it was already established) functionality. Septic need costly maintenance as well ( pumped etc) but it's probably much less per gallon of each for you... liquid in and liquid /solid out.

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**McTwister**

27 March, 2024

Just passing down their costs. <wink>

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**Fishin50**

27 March, 2024

The winter I get free power for all the overproduction in other seasons. Meter keeps track. You get it at a different time. \$13 a month is for the grid tie which includes maintenance of their wire etc

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**McTwister**

27 March, 2024

Interesting. I pay \$22.80 (the minimum) on 40 acres just to have service there, 0kW per month. It isn't even buildable (EFU80) so not buildable.

*(Edited)*

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**Fishin50**

28 March, 2024

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**Fishin50**

29 March, 2024

Is it EFU/recreational? Or strictly EFU? Outbuildings and Barn/shop can usually be constructed on EFU.

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**Fishin50**

27 March, 2024

I'm headed to hay. Had my tea and getting up early. Hopefully catch up soon if want more details. I have a ranch place and used solar there for long time too on batteries. Works good. Battery bank wiring configuration is important. I worked on Mobile power systems like police command post type set ups and learned about battery wiring configuration if going that route too. A simple change in the wiring changed battery life from 3-4 months to several years. Main leads need to be on positive of one battery and negative of battery furthest from the one with positive. Then all batteries wired in parallel. Or same theory with parallel and series to achieve voltage desired / array produces. Good night.

👍 🗨️ 1 • Share

**McTwister**

27 March, 2024

Thanks.

👍 🗨️ 1 • Share

**Fishin50**

28 March, 2024

No problem

👍 🗨️ 1 • Share

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# Consumer advocates call for dismissal of PGE's proposed 2025 rate increase



Advocate board for Oregonians protests PGE price hike

By [FOX 12 Staff](#)

Published: Mar. 15, 2024 at 1:47 PM PDT



PORTLAND Ore. (KPTV) - A nonprofit consumer advocacy group is calling on the state government of Oregon to dismiss Portland General Electric's proposed 7.4% rate increase for its customers in 2025.

The Oregon Citizens' Utility Board has asked the Oregon Public Utility Commission to reject PGE's request " in the face of record bills for PGE customers."

Last month, PGE requested a 7.4% rate increase for customers in 2025. The job of the Oregon Public Utility Commission is to regulate corporate electric and other utilities.



Who approves PGE's price increases in Oregon?

Bob Jenks, Executive Director the Oregon Citizens' Utility Board said in a statement, "Thousands of PGE customers are still reeling from the rate increase and ice storm bills in January. Rates for PGE households have already gone up by 30% from December 2022."

PGE raised their rates by 18% in January of this year and by 12% in January of 2023.

PGE has said that it needs to increase the rates so that it can make investments in battery storage and other infrastructure improvements.

"To achieve the day-to-day reliability that customers expect while simultaneously solving for the challenges of the future, Portland General Electric is deploying battery energy storage technology to modernize and strengthen the grid," said Larry Bekkedahl, senior vice president of strategy and advanced energy delivery. "We are focused on delivering reliable electricity to customers while keeping the cost as low as possible."

Jenks said that they are asking the Oregon Public Utility Commission to do something it has never done before.

"We need regulators to do something bold and unprecedented. Now is the time to flip the script and show our utilities that consumer protections come before profit."

FOX 12 has reached out to PGE for a response to the Citizens' Utility Board.

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KPTV

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# Consumer group asks Oregon regulators to dismiss new PGE rate hike request

Updated: Mar. 14, 2024, 7:03 p.m. | Published: Mar. 14, 2024, 6:50 p.m.



A state nonprofit group that advocates for utility customers is asking Oregon regulators to dismiss Portland General Electric's newest rate increase proposal. LC- The Oregonian



By [Gosia Wozniacka | The Oregonian/OregonLive](#)

A state nonprofit group that advocates for utility customers is asking Oregon regulators to dismiss Portland General Electric's newest rate increase proposal.

In a [motion filed Thursday](#), the Oregon Citizens' Utility Board asked the Public Utility Commission to throw out [PGE's 7.4% increase request](#). If approved by the commission, the increase would take effect in January 2025.

The Citizens' Utility Board, which was created via a 1984 ballot measure, said in a statement that it has never taken such an action before and is doing so now " in the face of record bills for PGE customers."

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The board points out that PGE's residential customers have seen a 30% increase in power bills over the past two years. Their rates went up 12% in January 2023 and by 18% this past January.

[Customers are reeling from record-high bills](#) that resulted from this year's rate increase and the ice storm in January and many won't be able to handle yet another increase, said Bob Jenks, the board's executive director.



Jenks said the utility's latest request for 2025 will likely grow to cover other costs such as wildfire mitigation or winter storm recovery.

"We're asking the Commission to do something they have never done before," Jenks said. "We are seeing historically high bills for many PGE customers and we need regulators to do something bold and unprecedented."

The Public Utility Commission regulates investor-owned electric and other utilities. Commission spokesperson Kandi Young said the Commission's normal practice would be to seek written replies from its staff and other parties and then issue a written ruling after reviewing responses. But Oregon CUB's petition asks the Commission instead to decide the motion at a public meeting.

"The Commission is considering CUB's request for a change to the standard process, and will advise parties when written responses are due," Young told The Oregonian/OregonLive via email.

PGE declined to comment on the petition and said it would continue to focus on its rate increase proposal.

"PGE is and will continue to be fully engaged in the public Rate Review process administered by the Oregon Public Utility Commission," the utility's spokesperson, Drew Hanson, said in an email.

PGE's 7.4% rate increase request is tied to clean energy needs – specifically, battery storage projects, PGE said previously.

In its petition, the Citizens' Utility Board told regulators that its review of the request found that the new Constable Battery Storage project, which is what's included in PGE's rate increase proposal, will cost only \$17.3 million, or 8.5% of the total \$202 million revenue demand.



The rest, said Jenks, will go toward higher profits for shareholders and shifting financial risk to customers, among other things – issues the commission already ruled on and rejected in December for the increase that went into effect this year.

If the Public Utilities Commission will not dismiss PGE’s entire rate increase case, the Citizens’ Utility Board asks that it limit the scope of what PGE can request, including removing all of the items that the commission previously ruled against.

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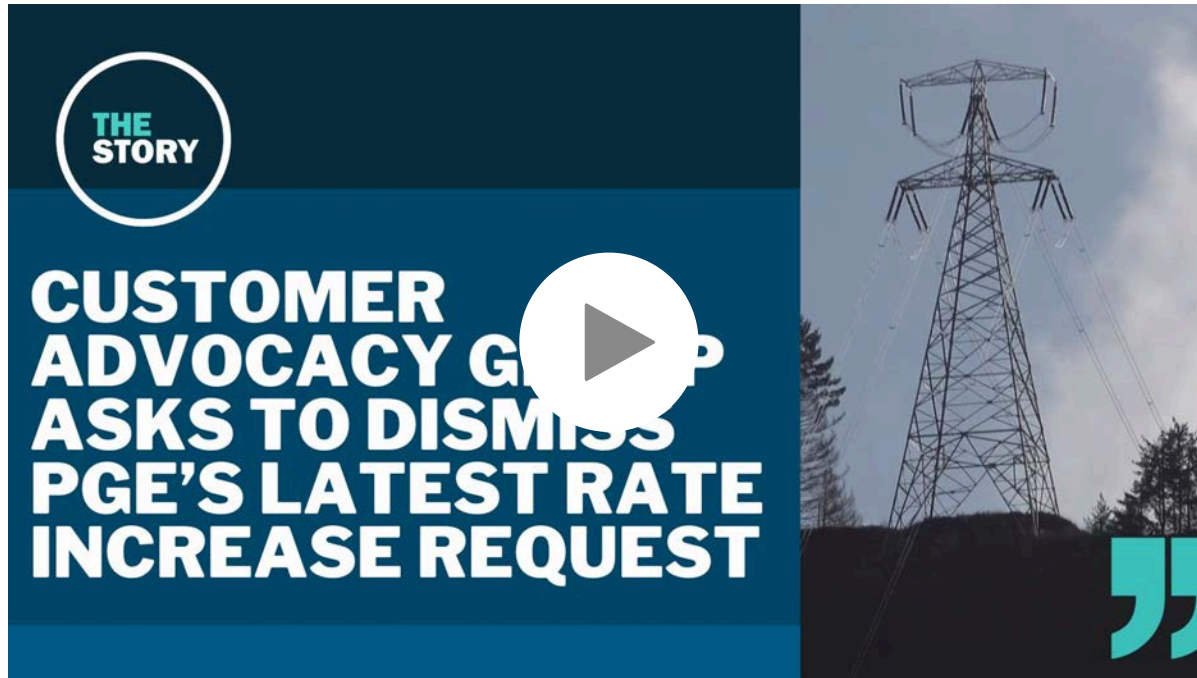
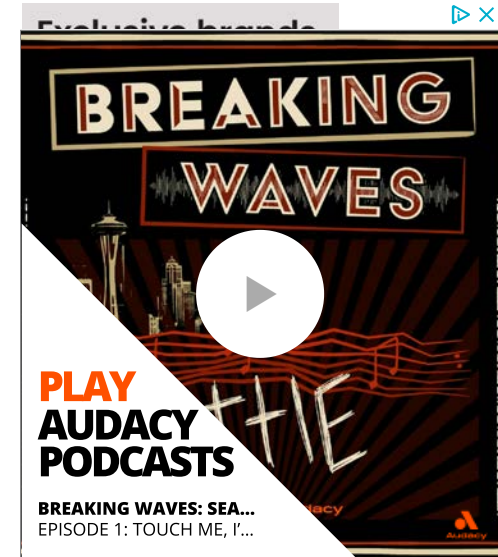
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### Ridiculously Picky Customers

THE STORY

# Customer advocacy group asks for immediate dismissal of PGE's latest 'tone-deaf' rate increase request

The Oregon Citizens' Utility Board says PGE's 7.2% request for 2025, on the heels of January's 17% hike, is "tone deaf" and regulators should throw it out.



Author: Evan Watson

Published: 5:17 PM PDT March 15, 2024

Updated: 7:50 PM PDT March 15, 2024



PORTLAND, Ore. — Portland General Electric (PGE) has [filed for regulator approval to further increase customer rates](#) by 7.2%, starting in 2025.

In response, the Oregon Citizens' Utility Board — a consumer advocacy organization — is taking the unusual step of asking the Oregon Public Utility Commission to immediately reject PGE's filing. PGE raised customer rates by 17% in January 2024, and between 7% and 20% for residential customers in 2023.

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Oregon CUB, which typically opposes rate increases, said it's making an "unprecedented appeal" for regulators to throw out the latest filing before review.

Bob Jenks, the executive director of Oregon CUB, said customers have been clear that "enough is enough" and the latest rate increase request is "tone deaf."

"[The rate increase filing] is loaded up with a bunch of other stuff, including wish list items, like a brand-new mechanism that would ensure large rate increases every January for the next 8 years," Jenks said. "We looked at this and said, 'This is not a good starting place for a case; the commission should reject this and tell the company to go back to the drawing board with a bit more empathy for your customers.'"

Jenks said he couldn't assess the likelihood of OPUC regulators agreeing with CUB in this case.

"To be honest, I don't know — we've never done this before. We've been around for 40 years; we've never asked at the front end of a rate case for it to be dismissed, so this is really new ground for Oregon," Jenks said. "I really don't know what our chances are, but we really do think it's the right thing, and it's what PGE customers want."

PGE previously said the proposed 2025 rate increase would help cover operating costs, upgrade infrastructure and install local batteries.

In response to the CUB motion, a PGE spokesperson shared this statement: "PGE is and will continue to be fully engaged in the public Rate Review process administered by the Oregon Public Utility Commission."

In explaining CUB's latest action, Jenks cited the 17% rate increase in January, higher-than-usual power bills in early 2024 due to a cold snap of weather, recent approved rate increases, and the broad scope of items listed in the PGE filing for regulatory approval.

***To comment directly on this topic, members of the public can share their thoughts with regulators at [this link under docket item UE 435 - PGE Request for a General Rate Revision](#).***

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# Oregon Public Utility Commission responds to public outcry

by Emily Girsch, KATU Staff  
Wed, March 6th 2024 at 10:26 PM

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rate increases and proposed new ones at utility companies.

PGE customers were hit with sticker shock on their first bill in 2024, **average customer rate hike of 18%.**

In February, **PGE submitted another request** for an additional 7% increase.

If approved, this would amount to a 25% increase in two years. And years.

"I recognize that people are struggling with rate increases from the tax they're seeing across the economy," said Megan Decker, chair of Oregon Public Utility Commission. "We won't approve rate increases when we are persuaded based on the evidence representing residential consumers, business consumers, environmental groups, and others. We're managing reasonably, but costs have nonetheless gone up."

Decker also said extreme weather events like ice storms, extreme heat, and drought have forced utility companies to make infrastructure upgrades.

"Our landscapes in Oregon change, and as the risk of catastrophic weather events increases, we're seeing more investment in infrastructure," she said.

### Tigard high school teacher dies

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Pacific Power customers saw rates go up by an average of 12.9% in January. The increase is set to take effect in 2025.

Oregonians using Idaho Power saw an increase of 4% in January.

"We're seeing requests from four major utilities right now," said Nolan Moser, chair of the Public Utility Commission. "That's really unprecedented at the PUC."

Moser and Decker said the commission does consider customers' comments through the process -- via public comments, emails, and public hearings.

"Our staff will synthesize those comments and present them to the commissioners. Commissioners can use those comments as part of the overall framework. Some comments may not result in our staff saying, well we're going to ignore that. But it causes them to bring forward other ideas about changing the way customers experience rates, and the kinds of programs offered."

Decker said the commission does also deny rate increase requests.

"There may be a perception that we are giving the utilities everything they want. The process is meant to hold utilities accountable."

**To get in touch with the PUC, there's a few ways:**

- Submit a public comment [here](#).

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Oregon Public Utility Commission responds to public outcry over rate increases (KATU - 4 PM)



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**cliffclavin49**

7 March, 2024

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Independentbychoice

7 March, 2024

Yeah, people seem to think that all these new neighborhoods and busines and all the power infrastructure already exists. They have no idea what a s transformer costs, or how much transmission or distribution lines cost per They also seem to be ignoring ...

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cliffclavin49

7 March, 2024

The average persons votes with their feelings and have no idea how t little understanding about science.

The transmission lines are part of the problem and loose 5-7% of the push more energy through existing lines since loss will increase. New built and those lines need to be joined rather than having many differ

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I am actually surprised that terrorists haven't targeted the grid since very small and the changes would be minimal. They could shut down not require a lot of folks to get it done. For those thinking I am giving have already thought about it or are already working on it.



The energy grid is a national security issue that needs to be addressed. Legislatures fail to grasp that concept. They can't even fix daylight saving time without an embarrassment.

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**cheesefries**

7 March, 2024

Why not say no to annual increases and let PGE figure out their budget. No matter what they say it seems PGE asks for an increase and they receive it every time. Also using that as a reason for an increase, how much does PGE absorb of this, or are we paying for it?

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**SHope**

7 March, 2024

We pay for all of the income assistance. Your bill shows you how much fees you pay for that. Others can have cheaper bills.

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**Independentbychoice**

7 March, 2024

Did you miss the part where it is just about EVERY utility provider? You know you don't pay for maintenance? Things get old and fail. See: PG&E.

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**LKRH8R**

7 March, 2024



which prior to her involvement was a thriving business for over 100 years.....how charge of anything at this point? I guess it pays to know the right people, they w your red flags.

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**Independentbychoice**

7 March, 2024

Seems a little disingenuous to blame her for a smaller paper company gett environmental disaster (estimated \$62M clean up). Especially considering : Pope and Talbot. Let me guess, she was the one who set up the lumberyar born and it was her fault the trade dispute between the US and Canada be

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**Independentbychoice**

7 March, 2024

If she bankrupts 5 more companies, then she would be considered a finan elected to be President of the USA.

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**GrumpyOldMan**

7 March, 2024

Wait until the payouts for the fire lawsuits hit. It will be another 20% increase.

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**QuentisGoddard**

7 March, 2024

correct they have to pay off those lawsuits somehow, not like they are goir public will of course.

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**LBrogowski**

7 March, 2024

The actual increase from a 7% increase on top of an 18% increase on top of a 15% increase aren't we comparing to the PUDs and co-ops?

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**QuentisGoddard**

7 March, 2024

But we need to build more housing because there is a housing crisis! Tell the city for the higher rates needed to pay for all these.

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**KATUNerfedMyAccount**

7 March, 2024

PUC response. If you don't like the 25% we can increase it to 50% because nobody doing whatever we like to you.

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**MadasWetHen**

7 March, 2024

There's always camp fires and candles.

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**Reaver**

7 March, 2024



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**Bikerbobpoet**

7 March, 2024

I don't make half of Megan Decker's \$166,840.05 salary. Maybe if I made that kind of money I wouldn't mind the screwing she is giving me. My bill went up 30%. I just wish they had to screw me so hard.

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**SickOfItPDX**

7 March, 2024

As the CEO of PGE makes 7 million a year at least. Not to mention their executives

PACIFIC POWER is even worse since it is Warren Buffet and gang.

Tell them to shove it and manage their current funds better. They're sooooo good at not being able to figure out what they need in 1 raise? OH SOMETHING ELSE CAME UP.

This is a crock of crap. You all need new jobs.

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**1PureLogic**

7 March, 2024

Enjoy it, SUCKERS! Democrats encourage you to keep voting for them.

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**Independentbychoice**

7 March, 2024



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From the Portland Business Journal:

<https://www.bizjournals.com/portland/news/2024/03/14/pge-rate-hike-cub-motion-to-dismiss.html>

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Energy

# Ratepayer group asks Oregon regulators to throw out PGE rate hike bid



The Citizens' Utility Board asked the Oregon Public Utility Commission to dismiss Portland General Electric's rate request for 2025.

PORTLAND GENERAL ELECTRIC



By **Pete Danko** – Staff Reporter, Portland Business Journal  
Mar 14, 2024 **Updated** Mar 15, 2024 1:14am PDT

 Listen to this article 3 min



In what it called an "unprecedented appeal" to regulators, Oregon's residential ratepayer advocate on Thursday formally asked the Public Utility Commission to dismiss Portland General Electric's latest proposed rate increase.

PGE late last month **requested a 7.4% overall average rate increase** in 2025, 7.2% for the residential customers that the Citizens' Utility Board represents. It would come on the heels of an 18% overall increase that hit **PGE residential customers** in January, with an expected 2.7% boost for wildfire mitigation costs still due to kick in this July (PGE said it pushed that effective date back from April).

Rates also rose in 2023, and the new PGE request would drive PGE prices some 40% above where they stood in 2022, according to CUB.

### **Something 'never done before'**

"We're asking the Commission to do something they have never done before," Bob Jenks, CUB's executive director, said in a news release. "We are seeing historically high bills for many PGE customers and we need regulators to do something bold and unprecedented. Now is the time to flip the script and show our utilities that consumer protections come before profits."

A PGE representative, responding to a request for comment, emailed that "PGE is and will continue to be fully engaged in the public Rate Review process administered by the Oregon Public Utility Commission."

If not a dismissal, CUB asked the PUC to "segregate" several issues from PGE's request, including PGE's ask for an increase in its return on equity – its profit margin, in essence – from 9.5% to 9.75%. CUB said many of those issues were fought over in last year's PGE general rate case.

"The Company seeks to re-litigate many of the contentious issues that were collaboratively resolved and determined to result in just and reasonable rates mere weeks earlier," it said in the PUC filing.

CUB said it was supported in its motion by Lewis & Clark Law School's Green Energy Institute and the Alliance of Western Energy Consumers, which represents big energy users.

Rates are ultimately set by the three-person, governor-appointed PUC after a 10-month process that includes regulatory staff analysis and stakeholder and public input.

## **PGE's battery investments**

With rates already on the rise, PGE executives earlier last month had told investment analysts that the company would look to file a **narrowly focused general rate case**, mostly to pay for new battery energy storage systems it expects to bring online next year.

But CUB saw the request that came less than two weeks later as far from narrow. Out of a \$202 million revenue requirement boost, just \$17.3 million was directly attributable to the battery systems.

PGE, though, says substation costs to integrate the batteries also need to be paid for, along with other transmission and distribution system upgrades that the utility says will improve reliability and help it meet growing load.



THE STORY

# PGE debriefs after January storm that left thousands without power in Portland metro

The company wants regulators to approve a new mechanism for more frequent rate hikes in order to pay for safety and resiliency work on its system.



Author: Pat Dooris

Published: 6:04 PM PST March 4, 2024

Updated: 6:48 PM PST March 4, 2024



PORTLAND, Ore. — Once the clouds lift, the streets thaw and power gets restored after a winter storm, it's easy to move on and forget just how impactful it was. The ice storm that hit the Portland metro area in January left hundreds of thousands of people without heat amid below-freezing temperatures — some of them for [roughly a week](#).

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The snow, ice and winds took out 850 distribution lines owned by Portland General Electric. Over the course of that week, the utility said that 440,000 customers lost power. About 146,000 Pacific Power customers lost power as well.

[At least 10 deaths](#) were linked to winter weather-related causes during that week — five believed to be from hypothermia and the others from downed trees, power lines or fires.

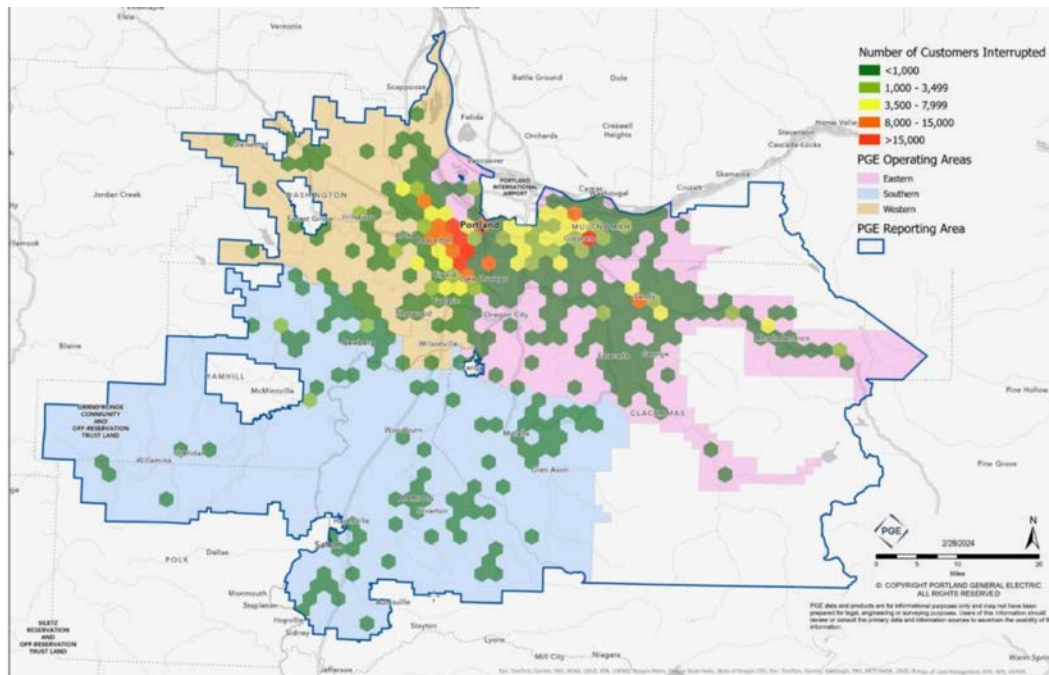
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### RELATED: 'It's dysfunction': Multnomah County under scrutiny after closure of warming shelters amid ice and snow

On Monday, PGE released a formal report required by the Oregon Public Utility Commission which breaks down what happened during the storm and how it responded.

The utility company reports that as the storm arrived, high winds knocked out power to about 270,000 customers in the first wave. More outages came and went as the storm progressed. Many outages from the first day had been resolved when a third wave of the storm came through Jan. 19, causing another spike in outages that persisted for about two days.

The storm ultimately lasted a week, from Jan. 13 through Jan. 20, with waves of wind, snow and ice hitting the area. About 109,000 customers lost power multiple times during that period. The hardest hit areas were in Beaverton, Tigard and Lake Oswego.



Credit: Portland General Electric

Map of outage concentrations from PGE's Major Event Report for January 2024.

In response to customer complaints about poor communication during those outages, PGE said that it was hard for crews to access some areas during the storm, making it difficult to give estimates on when power would be restored.

**RELATED:** [After big rate hike, PGE customers may also be on the hook for winter storm power restoration work](#)

## Pump up the rates

After the storm had passed, many PGE customers got a rude awakening when their bills arrived. Not only did the bitter cold of that week result in higher heating costs, but the company received approval late last year for a [rate hike of about 18%](#), taking effect in the new year and first appearing on those January statements.

**How-to Know if Someone Blocked You on  
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And the utility company has already signaled that they want to raise rates even higher. In a new filing, the company requested another hike of 7.3%. The company argues that it deserves to

X



make a 9.75% rate of return, and that won't happen without another increase in what customers pay.

The company also wants a new mechanism to ask for more frequent rate hikes in order to pay for safety and resiliency work on its system.

### **RELATED: [After raising rates by 17% in 2024, PGE requests further hikes for 2025](#)**

The Story's Pat Dooris reached out to PGE for an interview with CEO Maria Pope, but she was not available to talk Monday. On the other side of the issue is Bob Jenks from the Oregon Citizens' Utility Board, a watchdog group representing consumers. He didn't think highly of PGE's request.

"The most incredible thing is they want a new rate making mechanism that allows them to raise rates every January for billions of dollars in capital investment with a very limited review by the PUC and stakeholders like CUB," Jenks said. "Without any ability to look at profits and see whether shareholders should help pay for this."

## **Pushed to the limit**

In its filings, PGE points out that it is investing in two huge battery storage operations in the Portland area that will store up to four hours of electricity and power as many as 260,000 homes.

And then there is the impact of climate change and the shift toward clean energy, which plays a role in the need to raise rates, according to the company. During testimony to the PUC, Pope said that there are now more days where electricity is needed to cool our homes and businesses and days where it's needed to heat them, leading to more demand.

"Before 2022, PGE's peak load record held for nearly 25 years," Pope said. "Now we are seeing new records set almost annually, with a new winter peak load record set in December 2022 and new summer and all time system peaks set in June 2021, and then again in August 2023."

X

At the same time that the climate is fluctuating more wildly, coal plants around the Western U.S. are being shut down. The plants are dirty and bad for the environment, but they've also been dependable sources of electricity. As those plants close down, there are fewer reliable sources of electricity during big weather events, PGE said.

"As utilities through out our region embrace new clean energy technologies and beneficial electrification to reduce carbon emissions, regional capacity supply has tightened and frequently reaches critical levels during peak events," Pope said. "And energy prices regularly rise to unprecedented levels during high-demand periods."

The January storm was the coldest the region's been in 30 years, Pope said, and it stressed the electrical grid to the extreme.

"This regional weather event created extremely high and volatile wholesale energy market prices," she said.

For example, Pope said, one market charged \$1,000 per megawatt hour. But the massive California Independent System Operator charged \$2,000 — double the cost for the same amount of energy.

Regional electric supplies were stretched to deficit levels, so there simply wasn't enough to go

X

did not elaborate on which ones those were.

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### Energy

# PGE readies another rate filing. Will it be a big one?



Rates have been on the rise for investor-owned utilities PGE and PacifiCorp (Pacific Power), the state's No. 1 and No. 2 biggest electricity providers, respectively.

PORTLAND GENERAL ELECTRIC



By **Pete Danko** – Staff Reporter, Portland Business Journal  
Feb 20, 2024

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Portland General Electric (NYSE: POR) expects to file a new general rate case soon. What that means for electricity prices remains to be seen, but with affordability concerns top of mind, company officials indicated the request will be narrowly tailored to bring two big battery energy storage projects into rates.

In its fourth-quarter earnings call on Friday, PGE CFO Joe Trpik said the projects "put weight on the scale for a near-term" filing. It typically takes 10 months of investigation, stakeholder feedback and public input for the Public Utility Commission to set new rates.



Image: Portland General Electric

Joe Trpik, chief financial officer, PGE

ADAM GUGGENHEIM

Rates have been on the rise for investor-owned utilities PGE and PacifiCorp (Pacific Power), the state's No. 1 and No. 2 biggest electricity providers, respectively. Their circumstances vary, but a spike in power costs, rising wildfire risk and system investments – some related to the clean energy transition – have played a role for both.

Ahead of PGE's earnings call, Bob Jenks of Oregon CUB, which advocates for residential customers in rate proceedings, told the Business Journal that PGE needed to find ways to limit its next rate request.

"They've got the battery storage investment that they need to bring in and a rate case is a way to do that," Jenks said. "But after rates have gone up 30% in 14 months, what the rate case can't be is an opportunity to hang ornaments on the Christmas tree and see what they can get."

### **'Always thinking about affordability'**

Affordability got a lot of attention in the PGE earnings call last week.

"We start our case here always thinking about affordability to the customer, also considering we've had a previous case here," Trpik said, referring to an 18% average residential rate increase that went into effect in January. "I would expect in this case, truly, the focus is going to be on the batteries."

PGE is spending \$150 million on a battery array in Hillsboro that's expected to go online by the end of this year and \$360 million on a larger system in North Portland that has a mid-2025 expected startup.

The projects, selected in a competitive bidding process that concluded last year, are intended to help PGE meet peak demand without increasing climate emissions as its load grows and it moves away from fossil fuels to clean but weather-dependent energy resources.

"We have to always keep customer prices first and foremost," CEO Maria Pope added. "There's no question that we have seen customer price pressures, and we are very attuned to the interest of our customers and making sure that affordability stays first and foremost."

## Spending more on transmission

In the call and a new investor presentation, PGE also outlined big new investments in transmission, breaking it out into a category separate from distribution spending for the first time in recent years. A year ago, PGE forecast it would spend \$2.3 billion on transmission and distribution in the four-year period from 2024 through 2027. Now, with \$870 million earmarked for transmission alone, the total is expected to rise to \$3.3 billion.

Many of the projects are "reconductoring" – boosting capacity – on existing lines and rights-of-way.



Image: Permission granted to PBJ

Maria Pope, president and CEO, PGE

PHOTOSBYKIM.COM

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"Some of the transmission spend was in our historic run rate," Pope said. "Some is new and incremental. We think of this sort of as concentric circles. The first circle being within our service territory, really directly being impacted by customer growth. The

second is to bring clean energy from our area or just adjacent to our area to our customers. And then the third is broader investments across the Northwest."

In a biannual report on its local transmission plans released in late December, PGE identified 18 projects needed to maintain compliance with reliability standards. Several of the projects are intended to feed load growth, often in the Hillsboro-Beaverton area. **PGE has cited data centers** and the semiconductor industry – both commonly found in that area – as big load-growth drivers.



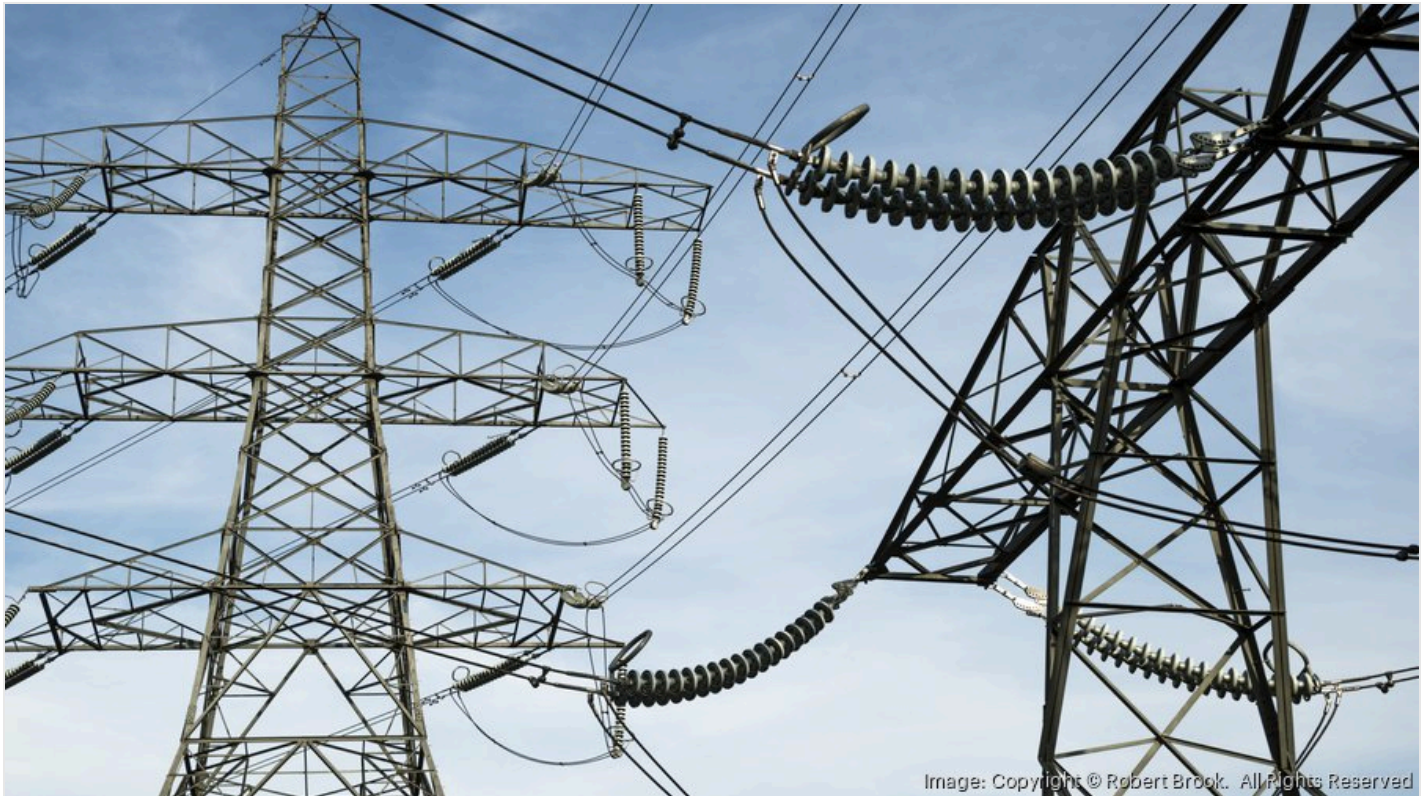
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Energy

# Portland General Electric reveals size of latest rate-increase request




PGE cited battery energy storage systems and transmission and distribution investments in its new rate increase request.

ROBERT BROOK



By **Pete Danko** – Staff Reporter, Portland Business Journal  
Feb 29, 2024

 Listen to this article 3 min



As expected, Portland General Electric has filed for a rate increase in 2025, asking state utility regulators for a 7.4% bump to pay mainly for big new battery systems, the utility says.

PGE earlier this month told investment analysts it was **likely to submit a general rate case** to the Public Utility Commission, largely to start paying for two new battery energy storage projects that cost a total of \$510 million.

Rates have been on the rise for investor-owned utilities PGE and PacifiCorp (Pacific Power), the state's No. 1 and No. 2 biggest electricity providers, respectively. PGE rates rose 17% overall in January – **18% for residential customers**. PacifiCorp recently filed for **16.9% rate increase** next year.

The trend has raised affordability concerns among customer advocates. PacifiCorp's proposal came under fire and PGE was urged to limit any new rate ask to absolute necessities. PGE executives, in the call with analysts on Feb. 16, acknowledged the price concerns.

"We have to always keep customer prices first and foremost," CEO Maria Pope said then. "There's no question that we have seen customer price pressures, and we are very attuned to the interest of our customers and making sure that affordability stays first and foremost."

PGE is spending \$150 million on **a battery array in Hillsboro** that's expected to go online late this year or early in 2025, and \$360 million on a **larger system in North Portland** that has a mid-2025 expected startup.

Technically, the PGE general rate case asks for a 7.3% increase in the new year, based on a \$202 million boost in revenues. But a concurrently filed power cost update pushes the effective hike to 7.4%, although a refund from investment tax credits tied to the battery storage projects would send the figure back down to 7.3% again in June 2025.

In its filing Thursday, PGE said the battery projects are needed "to provide reliable capacity and facilitate integration and firming of emissions-free renewable resources into the generating mix." The company also cited transmission and distribution system investments, including projects to "address aging infrastructure and strengthen electric equipment to better withstand weather events and provide greater resilience and reliability."

In addition, PGE wants regulators to boost its return on equity from 9.5% to 9.75%. That's the profit margin built into rates to attract capital needed to operate and maintain a reliable system. The requested boost "reflects a needed return for PGE's risk profile and required return for PGE to continue to access capital markets and make investments on behalf of our customers," the utility said.

Rates are ultimately set by the three-person, governor-appointed PUC after a process that includes regulatory staff analysis and stakeholder and public input.



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THINK OUT LOUD

# Portland General Electric could raise rates by 7% in new proposal

By **Rolando Hernandez** (OPB)March 8, 2024 3:25 p.m. **Updated:** March 18, 2024 1:15 p.m.

## Broadcast: Monday, March 11

0:00 / 25:31

Portland General Electric residential customers saw an 18% increase in the cost of their electricity bills since the beginning of January, the highest rate increase within the past two decades. Now, [a new proposal](#) from the utility aims to raise those rates again. If approved, electricity bills could be 7% higher than they are now starting at the beginning of 2025. Bob Jenks is the executive director of the [Oregon Citizens' Utility Board](#), an advocacy group that represents consumer interests in utilities. He joins us to share his thoughts on the proposal. We'll also hear from Kristen Sheeran, PGE's senior director of policy planning and sustainability, to learn more on why they believe this increase is needed.

*Note: The following transcript was created by a computer and edited by a volunteer.*

**Dave Miller:** *This is Think Out Loud on OPB. I'm Dave Miller. Oregonians are paying a lot more for electricity than they were just a few years ago. Rates for Pacific Power customers went up 33% in the last 14 months. PGE customers saw a similar*

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*director of the board that advocates on behalf of ratepayers in Oregon, but we start with Kristen Sheeran. She is PGE's senior director of policy, planning and sustainability. Welcome to the show.*

**Kristen Sheeran:** Thank you. Thank you for having me.

**Miller:** *What are the biggest drivers for this proposed increase for next year?*

**Sheeran:** The proposed increase for next year is really to help meet growing customer demand on our system and bolster reliability. In order to do that, it's imperative that we're able to make investments in updating our aging infrastructure, to improve resilience and to create the flexibility on the grid that's going to allow energy to flow for more resources and in more directions to support our changing customer needs.

As we look around the country, PGE is confronting the same challenges as other utilities. We have a grid that was built decades ago for a very different energy system and very different energy needs than what we see from our customers today. We're all operating in a very challenging macroeconomic environment with continued inflation and high interest rate costs.

Our customer energy demands are changing. We're seeing electrification and significant load growth on the commercial industrial side. And climate change is creating extremes and weather patterns that are creating additional wildfire risk, damages from storms, as well as changes in peak energy demands on our system, and how we manage those peak loads to ensure reliable continuous service for our customers.

**Miller:** *In a tweet about this proposed increase, you emphasized "investments in local battery energy storage systems." That was the first thing you mentioned in that short tweet. But KOIN News looked into the filing and found that only about \$17 million of the \$202 million total increase would go towards battery storage facility projects in 2025. Why emphasize batteries in your communication with the public?*

**Sheeran:** Well, capital investments account for 75% of the proposed increase in the filing we just did with the Oregon Public Utility Commission, and this includes capital investments in those batteries that you referenced, as well as

reduce the risk of outages for customers, and they also help us reduce the need to purchase energy from the power markets during times of peak demand. And this has both a cost and the carbon benefit for our customers.

*Miller: I'm just wondering about the emphasis, though. I mean, if it's something like 8% of the total cost, why have that be the focus of your main public communications tweet about the reason for this increase?*

**Sheeran:** Well, I mean, we've talked about both the battery projects and all the costs that go into the battery projects - integrating them into our system, any related operation and maintenance expenses. But then there's also the continued investments we have to make as a utility on our transmission and distribution systems, and that includes enhancing our current lines and updating aging ones. And this is what's gonna ultimately allow us to bring in more regional diversity of sources onto our grid, and to accommodate this very significant load growth we're seeing in our service territory from electrification and economic expansion.

So batteries are a new resource, a new type of resource for us on our system. It's a significant investment in batteries and battery storage that PGE has made; I think the largest single acquisition in batteries outside of the state of California. So that's new and significant. We continuously make investments in transmission and distribution upgrades and enhancements. But as our system continues to age and as electrification and load growth continue to put demands on that existing legacy infrastructure, we'll see more and more of these T&D [transmission and distribution] investments as we move into the future.

*Miller: I wanna run a voicemail by you. This is one of our listeners, Richard, who called in from Portland.*

**Richard [voicemail]:** "I called PGE and asked them if they had done any neighborhood impact studies about what their rate increase might do or cost people, and they had not, they do not, they did not. That's what they told me. They did not do any neighborhood impact studies, which I find really disheartening; people just raise the prices and they walk away like, 'Well, that can't cause any trouble.' And I think it's going to cause a lot of trouble and a lot of unintended consequences."

*Miller: If the current request is approved and not increased, it would mean a 40% increase in electricity rates in just - what, three*

**Sheeran:** Well, absolutely. First of all, as we modernize and strengthen the grid, we are focused on keeping the cost of electricity as affordable as possible for customers. As a utility, we exist to serve power to our customers. And affordability is absolutely at the forefront of all the decisions we're making in terms of our investment, in terms of our day-to-day operations, how we operate the system and how we look to the future. The process that gets set forth once we do this filing at the OPUC [Oregon Public Utility Commission] begins a very public process where the public gets to weigh in on what's been proposed in terms of cost recovery for primarily those capital, but also some related O&M [operating and maintenance] investments. So there are certainly channels for public input.

But I think it's also important to note that as we're trying to mitigate the costs of these investments in our system on our customers, we're looking at all different ways to reduce customer bill impacts. We just recently expanded our Income-Qualified Bill Discount Program, which is an energy assistance program for families and households that qualify, to help folks continue to be able to afford their electricity. We have a variety of different tools and programs that help customers across the income spectrum manage their energy use and cost, including incentives for energy efficiency, where we partner with the Energy Trust of Oregon, and tools like our Smart Thermostat Program, Time of Day, EV Smart Charging, and Peak Time Rebates. All of those are intended to give customers more control over their electricity usage so they can help manage costs on their end, as we're doing everything we can as the utility to make prudent investments to maintain system reliability. So that the same continuous electricity service our customers have looked to us for the last 130 years can continue into the future.

***Miller:** At a time when a lot of ratepayers are struggling to pay these bills that are getting bigger and bigger, you're asking to increase the profit margin from 9.5% to 9.75%. You also write in the filing that if you don't have this increase, the profit margin could go down to say, 4% or 5%. What's wrong with that? What's wrong with having shareholders get a lower profit margin when people are struggling to pay their bills?*

**Sheeran:** Look, our customers are at the forefront in all of our decision-making. And as I mentioned earlier, we exist as a utility to serve safe and reliable and affordable power to our customers. But with the pressures we're seeing, not just on PGE's system but across the country as we look to modernize the grid to meet today's customers energy demands and a cleaner energy future, the reality is it's gonna take all of us to get there. And our shareholders help us

**Miller:** *Let me make sure I understand your argument. You're saying that if you can't get a guaranteed rate of return from Oregon regulators that is close to 10% next year, you won't have enough shareholders, they will just bail, and you won't be able to spend enough money on the required infrastructure needs that you're saying you need to make. Is that your basic argument?*

**Sheeran:** No. What we're saying is that our shareholders and our investors are a critical piece of the puzzle in how we're able to deliver electricity service to Oregon customers.

**Miller:** *But why can't they get a 4% or 5% rate of return? That seems like a pretty good rate of return.*

**Sheeran:** I think rates of returns have to be looked at comparable to rates of return for other utility investments across the country.

**Miller:** *Because if you don't give it, and make it 9% or 10%, you're saying they will take their money out of PGE. I just want to understand the basic point here, because I think listeners will really care about this.*

**Sheeran:** We need a rate of return that's competitive so that we can continue to attract the low-cost capital that allows us to make the investments in our system that will enable us to continue to provide electricity service to our customers in the most affordable, safe and reliable ways we can.

**Miller:** *Kristen Sheeran, thanks very much.*

**Sheeran:** Thank you for your questions.

**Miller:** *Kristen Sheeran is PGE's senior director of policy, planning and sustainability.*

*Let's listen to another voicemail right now. This is Kathy from West Linn.*

**Kathy [voicemail]:** "I got my largest bill I've ever received from PGE for January. And the thing about that was that I was away for a week, and only kept a few lights on for security reasons while I was away. I got my second bill from PGE since I had my solar panels installed and I still have to pay close to what I had been paying when I was on PGE's Equal



**Miller:** *Bob Jenks joins us now. He is the executive director of the Oregon Citizens' Utility Board, which advocates on behalf of ratepayers. Welcome back to the show.*

**Bob Jenks:** Great. Thank you.

**Miller:** *Why are you opposing this proposed increase from PGE for next year?*

**Jenks:** At this point, we don't think customers can afford it. The rate increase that went into January was really, really hard on folks; people don't pay rates, they pay bills. And the week of cold weather - when the temperature gets down to 20 [degrees], it takes a lot of energy to power your house. There's still thousands of customers who haven't paid their January bill. And to immediately turn around and say, "yeah, that was okay, now let's do it again" - we just think is premature. It doesn't make sense.

We think PGE should withdraw this rate request, reduce it down, get rid of things like the shareholder profit increase you proposed, put it off until....you have a second battery storage project coming on in July of 2025. Time it when that gets done or time it at a later point. Let customers absorb the increase that they've already had, let them pay for that January cold snap, and let's move forward.

**Miller:** *You pointed out in a recent blog post that this 7.5% rate increase request does not include a bunch of things: wildfire mitigation costs, costs associated with the utilities Colstrip coal plant, or increases from the cost of wholesale power, what they pay to actually bring the power to their customers. What's a ballpark figure, if you have one, for what those additional requests - when they're added in, in the summer or the fall - could add up to?*

**Jenks:** It's hard to know for sure. We think some of the costs, the wildfire mitigation, I believe, is about a 2.7% increase. That's expected around the first of April. But PGE has these mechanisms that allow them to add costs throughout the year. So the power costs and the costs of fuel will be added on a regular basis throughout the course of the year. New contracts can be added in.

Last year, the rate case didn't start out at 18%. It somewhat caught us by surprise. You expect the original filings to

increase is gonna be next January, but people shouldn't assume that the worst it could be is 7.2% because that's what they're asking for at this time of the year.

*Miller: In other words, even though you're saying they should not make this 7% increase, you wouldn't be surprised if it were higher than that come next year anyway, if it's 10% or 15% or whatever, it ends up being.*

**Jenks:** Right. I think one of the things we need to do is, we need to get control over PGE, the various rate-making mechanisms, and try to start managing their costs.

*Miller: You say PGE, but can you put PGE into the larger context of investor-owned utilities in Oregon?*

**Jenks:** Yes, PGE is just one. We have three investor-owned utilities: Idaho Power, which serves a little bit of Eastern Oregon and isn't subject to any of the clean energy laws in Oregon. Idaho doesn't have any clean energy laws. They're proposing a 26% rate increase. Pacific Power, which serves a good bit of the state, they're proposing a 22% increase on top of what you already listed as 30% over the last couple of years. So, utilities across the state are pushing for higher rates. PacifiCorp, a lot of it is driven by wildfire and wildfire liability.

It's a problem because customers can't afford to see their cost go up and up and up like this every year. When I took this job, and that was quite a while ago, I've been doing this for a number of years, the system used to be different. It used to be, a utility would file for rates. They'd get a rate increase and then they'd live with that rate increase. They'd live with those rates for a period of time until new investments and other things started to erode their ROE, erode their profit margin. And once the profit margin started to get lower and did start to affect its ability to compete with other folks for shareholder dollars, then they would ask to reset their rates. But often four or five years would happen between those rate cases. It may be that we can't go four or five years between them.

But the idea now, there is no longer an idea that a utility will live with the rate that's set. The rate was set in January, and in February - the next month - PGE is asking for another rate increase. And the question becomes, how long should they live with the rate? How long should customers have to adjust to it before we're back in and fighting over this stuff again?

**Miller:** *Did regulation change? Did statutes change in the decades that you're talking about? Or did expectations, on the part of shareholders or investor-owned utilities? I mean, is there something on the books that's different now than in the good old days you were talking about? You know, maybe in the mid-90's, say, when a rate would stay static for three to five years?*

**Jenks:** Yes, there's a couple of things that happened. There has been some legislation that's passed that allows utilities cost recovery. But a lot of it - in fact, this rate case that PGE has filed, the 7.2% rate increase - includes a proposal for a new mechanism to make it easier to raise rates every January for the rest of the decade. And so every time PGE comes in for a rate hike, they're not just asking to recover their new investments. They tack on policy issues. They want a new mechanism that allows them to raise rates, they want to shift risk from their shareholders to their customers. So, wholesale over time, rate making has become more about going line for line through a utilities' line items and saying, what do we allow them to put into rates, than starting and saying what should a just and reasonable rate be for the customer?

That, really, is where we think the conversation of much more focus is, is what's a reasonable rate for customers to pay, what's affordable, what is just to ask customers to pay, and can the utility live with that?

**Miller:** *On that note, it's a complicated question, almost a philosophical one, because if I understand it correctly, you're not saying, no, I don't think utilities should be hardening their infrastructure to make it less likely that their lines will cause forest fires. You're not saying they shouldn't be investing in wind and solar. These are things that you and the majority of Oregonians say are necessary. So it seems that the question is, who should be shouldering the costs? What's your argument for why shareholders should have to pay more for, whether it's innovation or infrastructure?*

**Jenks:** Right, it's not just who pays the cost. It's when the cost will be incurred. When suddenly we had new wildfire costs come in over the last couple of years, since the Labor Day fires. And the question is, did any of the utilities say, oh, we've got a big new cost our customers have to absorb. Maybe we should put off some of the T&D investments...

**Miller:** *T and D?*

**Jenks:** Transmission and distribution. Maybe we should put off some of the other things we're doing, delay it for a year

these things, we've got new costs, we've got things we've got to do. But how do we manage those within the context of the prices that are set by the market?

So, again, utilities need to make these things...

*Miller: ...Just to finish that sentence, because it's an important point, we're not talking about a competitive market here. We're talking about monopolies, right? I mean, when you're a renter or you own a house, there's one place you're going to get electricity from and that's why we have a Utilities' Commission that says, yes or no to these rate increases. But they're also in the funny position, it seems to me, of deciding what is an appropriate return on investment for shareholders. How do you think about that question?*

*I mean, I had a slightly confusing back and forth with Kristen Sheeran, but at least to my ear, in the end, she basically did say as I heard it, that if they cannot give their shareholders a good enough return on investment for this utility investment, that they'll just take their dollars somewhere else. And then I guess the larger point there, then, is they won't have enough money to do all the things that almost everybody agrees they need to do.*

*First of all, do you agree with that basic math, that if the state doesn't set prices high enough or allow PGE to set prices high enough, and Pacific Power and Idaho Power, that ratepayers themselves could suffer from a lack of investment by shareholders? Do you agree with that basic proposition?*

**Jenks:** Yes, but not in the way the utilities approach it. If profits go down for a year or two, it's not the crisis that they make it out to be. Ultimately, shareholders do invest in a company, there's a bunch of different utilities a shareholder could invest in and they're not going to invest in one that's chronically under-earning. But the real question in rate-making is really over time. If, again, utilities earnings can drop for a period of a year or two, knowing that it's going to go back up next time it gets reset, we don't have to be setting rates constantly, trying to always get them back up every time it drops.

Right now their ROE [return on equity] is 9.5. If it drops to 9.0 or it drops to 8.8 - we used to talk about 250 basis points as being a reasonable range for earnings. 250 basis points would be, from 9.5, 250 would be 7.0. So a much

get it up to nine, and utilities are always trying to ask to get it closer to 10, or in the case of Pacific Power and Idaho Power, they're asking for the rate of return to go above 10.

*Miller: You mentioned the wildfire liability. And in terms of wildfires, broadly, I think about this as sort of two directions. One is spending money proactively to make it less likely that a wildfire is going to start. The other is like Pacific Power has to do right now. They settled a recent lawsuit with the victims of the 2020 Labor Day Fire, especially in Southern Oregon. They're going to pay \$300 million for that and that followed losing an earlier suit this past summer. Are ratepayers, in this case, Pacific Power ratepayers, going to be paying those damages? Or will the company pay it in the form of shareholders?*

**Jenks:** In all likelihood, there's going to be some of both. You can't fully insulate customers from the impact of what could be billions of dollars of liability. Their credit's been downgraded, which raises the cost of borrowing. There's gonna be impacts, it's really hard to fully insulate the customer. And if the costs get high enough to drive them into bankruptcy, then there's gonna be consequences to the customer from that. So it's really hard to protect customers from it.

But at the same time, when a court has gone out and found somebody to be reckless, which is the language the court used, when the court goes out and assigns punitive damages to a corporation, turning it around and putting those punitive damages on captive customers who have no other choice, doesn't really punish the company at all. It punishes the customers. So there is a fundamental issue of, how do we address these costs? And shareholders really ought to be taking the costs that really are related to these court cases where they're being fined, that it's the company's fault, and costs are being assigned to the company, to cause pain to the company, to get it to change its behavior. Those costs shouldn't be picked up by customers.

*Miller: Just briefly, I mentioned the Public Utility Commission earlier, but what role do you think the legislature could play in reining in these rate increases? We have about 40 seconds left.*

**Jenks:** Ultimately, you can't do it at the Public Utility Commission. Then I think you will see legislation being proposed. If the legislature says that rent can't go up more than 10% above inflation, that's a reasonable definition of what is just unreasonable increases. And the question is, can we get utility rates into that kind of range? Can we get

**Miller:** *Bob Jenks, thanks very much.*

**Jenks:** Thank you.

**Miller:** *Bob Jenks is the executive director of the Oregon Citizens Utility Board.*

## Contact “Think Out Loud®”

*If you’d like to comment on any of the topics in this show or suggest a topic of your own, please get in touch with us on [Facebook](#), send an email to [thinkoutloud@opb.org](mailto:thinkoutloud@opb.org), or you can leave a voicemail for us at 503-293-1983. The call-in phone number during the noon hour is 888-665-5865.*

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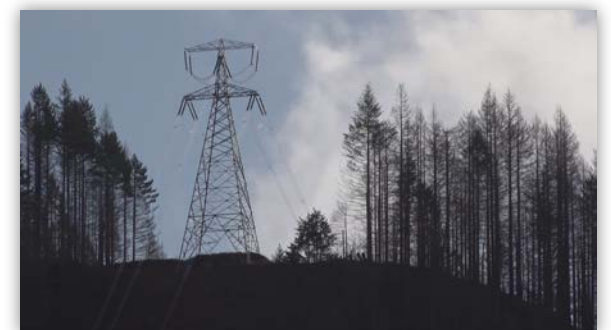


**BUSINESS**

# After raising rates by 17% in 2024, PGE requests further hikes for 2025

If approved, it would be the third year in a row that PGE has increased its rates.

Author: Amy-Xiaoshi DePaola, John Adams  
Published: 6:31 PM PST February 29, 2024  
Updated: 5:50 PM PST March 1, 2024





PORTLAND, Ore. — Portland General Electric (PGE) has asked the Oregon Public Utility Commission (PUC) to further increase rates by 7.4% next year.

If approved, this would be the third year in a row that PGE increased rates. [Rates for 2024](#) went up by 17%. In 2023, rates for residential customers increased between 7% and 20%.

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PGE said Thursday that it filed a [proposed rate review](#) for 2025 with the Oregon Public Utility Commission. An average customer would then, if approved, have a rate increase of 7.4%.

The company said the increased rates are needed to install new local batteries; upgrade the legacy infrastructure; continue maintenance and modernization of other energy facilities; and to cover operating costs.

“To achieve the day-to-day reliability that customers expect while simultaneously solving for the challenges of the future, Portland General Electric is deploying battery energy storage technology to modernize and strengthen the grid,” said Larry Bekkedahl, senior vice president



of strategy and advanced energy delivery. “We are focused on delivering reliable electricity to customers while keeping the cost as low as possible.”

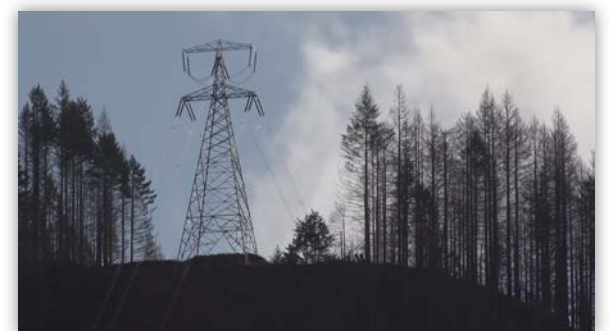
St. Vincent De Paul of Portland operates on the largest utility assistance programs in the area. Their office is typically inundated with calls.

"We get anywhere between 100 and 150 calls per day," said Craig Loughridge, the emergency services program manager with St. Vincent De Paul.

On the subject of the rate hike, Loughridge said, "It's going to make it tough for people who are challenged with paying their utility bill, especially the people we serve."

The Oregon Public Utility Commission has 10 months to review the request. If approved, the rate changes would take effect on Jan. 1, 2025, at the earliest, PGE said.

This month, [Pacific Power](#) also requested a 16.9% rate adjustment — roughly \$304 million — to invest in wildfire risk management, transmission infrastructure and renewable projects. If approved by the Oregon Public Utility Commission, the average residential customer could see a \$29.47 increase to their power bill each month.



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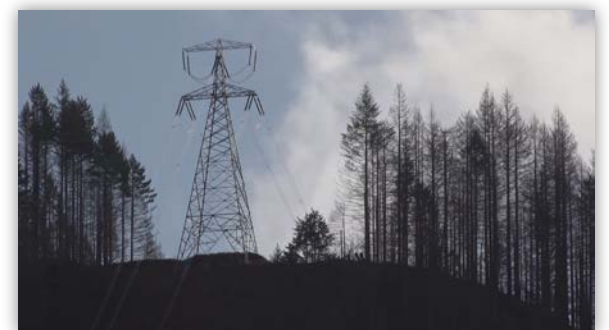


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# Portland General Electric wants to raise rates again



Portland General Electric (PGE) on Thursday requested a rate review with the Oregon Public Utility Commission.

By [FOX 12 Staff](#)

Published: Feb. 29, 2024 at 2:57 PM PST



PORTLAND Ore. (KPTV) - Portland General Electric (PGE) on Thursday requested a rate review with the Oregon Public Utility Commission.

The utility company said in a statement that it wants to raise customers' rate by an additional 7.4% in 2025 so that it can make investments in battery storage and other infrastructure improvements.

*"To achieve the day-to-day reliability that customers expect while simultaneously solving for the challenges of the future, Portland General Electric is deploying battery energy storage technology to modernize and strengthen the grid,"* said Larry Bekkedahl, senior vice president of strategy and advanced energy delivery. *"We are focused on delivering reliable electricity to customers while keeping the cost as low as possible."*

This comes just after the utility [raised customers rates](#) by 18% at the start of the year.



PGE customers surprised by charges appearing on days of power outages, rate hikes

PGE's rate increase in 2022 was 8%, and in 2023 it was nearly 9%. The 18% increase in 2024 plus the proposed 7.4% increase in 2025 means a more than 42% increase in total since 2021.

PGE serves over 930,000 customers in Oregon.

PGE customers we [spoke to recently](#) said raising utility costs are adding to the stress of the already-rising rents and groceries.

"Everybody I know is struggling to pay their rent right now, like everybody I know," Pratt said. "There's rich people, poor people, all in between, unable to make payments on what their house is."

"The cost is very prohibitive for people just to have a life that they enjoy even, not just surviving," Andre added.

The Oregon Energy Trust recommends a few methods to save on energy:

- Install LED bulbs in your most frequently used lights to save the most on energy costs—kitchens and bathrooms are a great place to start. Look for the Energy Trust logo at participating retailers.
- Turn off lights when not needed and use motion sensors for outdoor lighting.
- Unplug battery chargers for mobile phones, tablets, laptops and other devices when not in use—they use energy even when they're not actively charging anything.
- Group office and entertainment equipment on easily accessible power strips that can be switched off.

PGE offers rebates and incentives for energy efficiency, which you can learn more about [here](#).

You can also find more resources for saving energy and bill assistance from the Oregon Energy Trust [here](#).

FOX 12 has reached out to the Oregon Public Utility Commission for comment.

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PORTLAND

# Push back, petitions arise amid PGE's 'unaffordable' proposed rate increase

by: Brandon Thompson  
Posted: Mar 4, 2024 / 06:02 PM PST  
Updated: Mar 4, 2024 / 06:03 PM PST



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PORTLAND, Ore. (KOIN) — A **proposed rate increase from Portland General Electric** is being met with frustration from its customers. The increase, according to Oregon Public Utility Commission reports and analysis by the Oregon Citizen Utility Board would bring a total 40% increase since January 2022.

Last week, PGE announced in a social media **post** it had filed for an increase of 7.4% with the OPUC that would take effect next January.

Current	Tonight	Tomorrow
43°	40°	58°
Rain Shower	Showers Late Precip: 32%	Cloudy Precip: 24%

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...don't know what we will have to do if the rates are raised again," said Newton, an 88-year-old Portland resident said. "It is simply unconscionable for seniors to freeze in their own homes while PGE continues to raise their rates."

Newton is one of several people to take to social media after the announcement, voicing their frustration. The **latest increase of 17%** hit customers' wallets this past January, just as a week-long **ice storm** set in on the Willamette Valley.



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proposed. Jenks says it is common for more costs to be added to the filing during the months-long process of the OPUC evaluating the increase.

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PGE says the increase “supports investments in local battery energy storage systems to enhance reliability and flexibility, and other system upgrades.” However, in reviewing the filing, KOIN 6 News found just \$17.3 million is described to go to a battery storage facility project in 2025. When asked, PGE says the remaining amount of the \$202 million proposed increase includes other system upgrades, like distribution and transmission lines.

“The battery storage is the excuse, not the cause of this rate increase. What they’re asking for in this rate increase is it will be a corporate, which means they want higher profits for their shareholders.” Jenks said.

Part of the request does ask for PGE’s approved “return on equity” or profit margin to be raised from 9.5% to 9.75%. PGE says if the filing is not approved, the approved profit margin will drop down to 5.29%.

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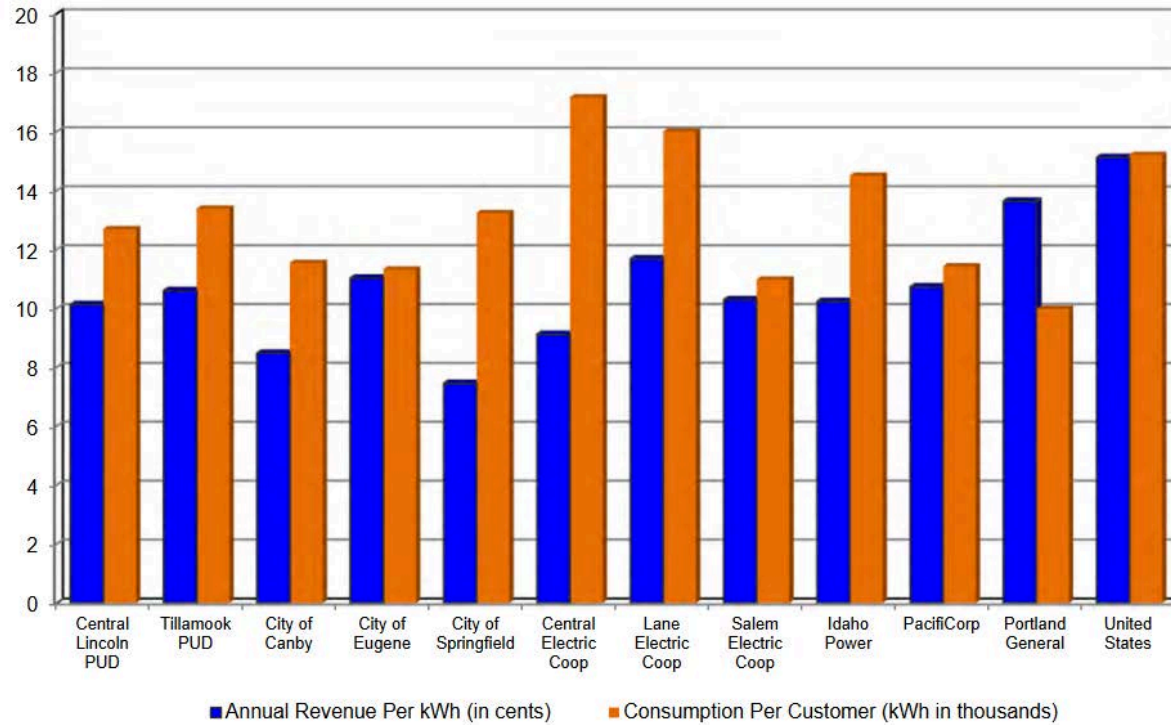


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[A] United States data for residential averages is from the Energy Information Administration, Department of Energy.

*Oregon DTC 2022 report shows how rates across different utilities compare. Not all rates are listed in the graph*

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Jenks argues the 30% increase in rates over the last 14 months is unfair to its customers.

“It clearly seems to me they are out of touch. They don’t understand who their customers are. They don’t sympathize with the struggles of their customers to pay their bill. And they’re really just focused on how they can get more money.”

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- Quite a lot
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Boone says his \$300 bill this month for his 800 sq. ft. duplex is hard to manage while being laid off from one job and starting another. He says he is considering having to move to keep up. Boone believes the OPUC is not protecting customers after allowing several years of rate increases to go forward.

“Our Public Utilities Commission has failed us,” Boone said. “Failure to truly limit PGE’s rate hikes to an affordable and acceptable percentage for everyone goes against everything they are for.”

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PODCASTS

# Why are Oregon electric, gas rates going up so fast? Beat Check podcast

Updated: Mar. 11, 2024, 8:40 a.m. | Published: Mar. 04, 2024, 6:00 a.m.



Three high voltage transmission towers, located just south of Sauvie Island, span the Willamette River in Portland, Oregon. LC- The Oregonian



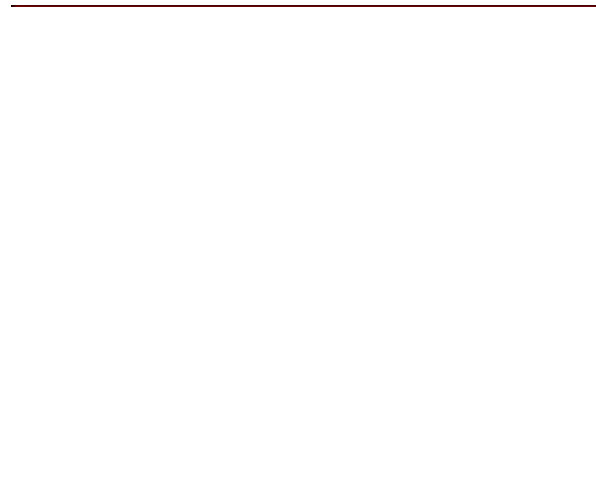
By [Gosia Wozniacka | The Oregonian/OregonLive](#)

Utility customers in Oregon have seen steep rate increases in the past two years – and more are in the works. What gives?

Portland General Electric customers saw their bills go up by [18% in January](#), in addition to a [14.8% rate increase in 2023](#). And PGE just proposed a 2025 [rate increase of 7.4%](#) on average for its customers.

Pacific Power customers saw bills increase by 21% at the start of 2023 and by another 12% in January. Pacific Power just filed another rate increase proposal in Oregon [seeking a 17% average increase](#). Idaho Power is also seeking to raise rates [by nearly 27%](#) for its eastern Oregon customers.

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And it's not just electric utility customers who are feeling the pinch. NW Natural gas rates have gone up by over 32% since September 2022.

Bob Jenks is executive director of the Oregon Citizens' Utility Board, a nonprofit organization created via a 1984 ballot measure to advocate for all state utility customers. On Beat Check, Jenks talked about why those rates are climbing so steeply, what the future of utility rates is and how climate change and our transition to clean energy and an all-electric future are affecting utilities.

Jenks also spoke about flaws in utility regulations and how his organization is working on reforming them.

He encouraged lower income customers to apply for the income-qualified utility bill discount programs, but said those programs aren't a panacea to solving the issue of energy affordability. PGE has just expanded its bill discount program to provide up to a 60% monthly energy discount to customers who qualify. Pacific Power has a similar program as does NW Natural.

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Beat Check with The Oregonian  
Why are Oregon electric, gas rates going up so fast?



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— Gosia Wozniacka covers environmental justice, climate change, the clean energy transition and other environmental issues. Reach her at [gwozniacka@oregonian.com](mailto:gwozniacka@oregonian.com) or 971-421-3154.

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Hello, Beach Check listeners. I'm Gosia Wozniacka and I'm the Environmental Justice Reporter at The Oregonian. Today, I'm with Bob Jenks, Executive Director of the Oregon Citizens Utility Board, also known as the Oregon CUB. It's an organization that advocates for utility customers. We're going to be talking about the significant rate increases that many PGE, Pacific Power, and Northwest Natural customers have seen in recent months. We'll talk about why those rate hikes are so large, what the future of utility rates is, and how our transition to electric and climate change are impacting utilities. So let's get started. Lots of important topics there. Welcome to the show, Bob. Thanks for taking the time to speak with me.

Before we get started on the rate hikes, can you just very briefly describe CUB's work?

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Bob Jenks (00:44)

Thank you. Yes, we're an independent nonprofit that represents utility customers. We were formed in 1984 because at that time, Oregon was one of just a handful of states that had no advocate working on behalf of customers. And we go before regulators, the regulators at set rates and supposed to protect customers, but if they don't hear from somebody on the side of customers, if they only hear from utilities, it's really hard for regulators to protect customers and act in our best interests.

So we were established to represent those interests before the legislature and state regulators. We have a team of lawyers and economists who dig into utility rate requests and into utility policies to find out if things are really in the best interest of customers. And we look for alternatives. When PGE wanted to spend hundreds of millions of dollars on retrofitting the Boardman coal plant, we looked at it and said no and pushed them to look at an analysis that would phase it out and close it in 2020 and found that doing that would save customers about \$200 million. But if somebody didn't step in and demand that was examined as an option, quite frankly, we wouldn't have been able to get there.

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Gosia Wozniacka (02:05)

That's great that you're able to represent customers and ask the utilities to perhaps make some changes in their proposal. So let's talk about those rate hikes. Customers of investor-owned utilities in Oregon have seen steep, steep rate increases recently, and more increases are in the works. PGE recently saw an 18% increase, and over the past two years, a 30% cumulative increase.

Pacific Power saw their bills go up by 21% in 2023 and another 12% in 2024. And Pacific Power just filed for another increase, 17% for residential customers. And Idaho Power is asking for a 27% rate increase for Eastern Oregon customers. So those are some pretty steep increases. Why are they happening?

Bob Jenks (03:02)

Right, there's a variety of factors and there is some truth that there's general inflation, just as things at the supermarket, a lot of prices have gone up, a lot of things utilities buy prices have gone up, steel for example is up more than 200% since 2020 and their salaries are going up. There were supply change issues coming out of COVID, things like line transformers and utility meters suddenly didn't have enough supply and that shot prices up.

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The wildfires that we've been having have been exposed to, the two big utilities are spending more than a billion dollars on hardening their system to protect from wildfires, and Pacific Power has huge wildfire liability. Capital investment in new transmission lines and batteries add costs. Load growth is a large part of what's driving that. The big server farms are causing them to have to add generation to their system.

And of course, utilities always want to take advantage of any kind of rate increases to say, oh yeah, let's increase officer salaries, let's increase shareholder profits and things like that. So anytime there's an opportunity to raise rates, they want to make sure that they're getting in on the additional money also.

Gosia Wozniacka (04:13)

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Mm-hmm. So many, many different reasons, and we're going to unpack a few of them later in the show. One thing I did want to ask, you know, rate increases obviously are a mechanism for the utility to recover costs and also to make some money for its shareholders. But why do customers have to pay for business costs versus investors? Like, why do customers have to pay for wildfire mitigation or for clean energy? Is there a general rate of return that PUC [Public Utility Commission] allows and that beyond that utilities can't ask for more?

Bob Jenks (04:54)

Yeah, there's really two types of utilities out there. There's non-profit consumer-owned utilities, and there's for-profit or investor-owned utilities. For-profit utilities are monopolies, and to prevent them from taking advantage of customers, they're rate regulated. By law, the regulator, in this case, the Public Utility Commission, the PUC, is supposed to allow them the opportunity to earn a reasonable return. Now, the definition is reasonable return, reasonable profits.

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In Oregon, our gas utilities are all for profit, our electric utilities are mostly for profit, and our water utilities are almost all non-profit and run by local governments. So the for-profit utilities, again, they get to earn a profit margin. And they're always wanting to... One of the things I've learned in decades of doing this is utilities always want higher profit margins for their investors, and they always want less risk for their investors. And that doesn't make a whole lot of sense to me. Why should I be giving you a higher profit for taking less risk. But that's the way the system sort of works right now.

Gosia Wozniacka (05:58)

Hmm. What is a reasonable profit? Is it like a percentage or?

Bob Jenks (06:05)

Yeah, normally the way you think about that is it's comparable to other companies, other businesses with comparable risk. Normally they look at other utilities out there and you think about it in terms of a reasonable range. There's not a single point that is a reasonable return that if you're a little bit below that you need to raise rates. So you can think of it as a range, say between a 9 and 10 percent return on equity and equity is the amount of equity investment that shareholders have in the utility. So you have that reasonable range and the Commission is supposed to be trying to sort of land the rate case with the utilities earnings in that reasonable range. One of the things we're going to be advocating for this year with these big rate increases is the Commission said itself to the legislature that one of the

ways it can help control large rate increases and respond to them is by setting the profit margins at the lowest level that meets that legal definition of reasonableness. So we're going to be asking the commission to move utility profit margins, not to the, not establish them at the midpoint of a reasonable range, but set them at the lowest place that is reasonable, that is legally meets that definition of reasonableness. And that sends a message to utilities that your big rate hikes and not controlling your costs are going to affect the profit margins that your shareholders are going to get. And we'll send, I think, a powerful message to them that they need to start to control their costs.

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Gosia Wozniacka (07:33)

Mm-hmm. You mentioned multiple reasons for why utilities raise rates in addition to trying to make money for their shareholders. Things like inflation, wildfire mitigation, cost of adding new clean energy projects and transmission into the grid.

And so I want to unpack a few of those because I think they're all really important. And maybe let's start with the wildfires since there is a lot of litigation around that. It's an area where all of the utilities or most of the utilities, the electric ones are asking for a lot of money. And just to clarify, wildfire management means tree trimming, vegetation removal in areas that are prone to wildfires. Why are utilities spending so much money on lessening wildfire risks and asking customers to pay that bill?

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Climate change has changed Oregon and across the West. Our forests exist in a climate that's hotter and drier than the trees evolved yet. And that means that they're very prone to wildfires, particularly in late summer where we have these long hot summers that are dry. You add a little bit of wind to those, or a significant amount of wind, and utility lines when they touch trees can catch on fire. And so you've got a problem where we've seen across the West fires created by utility equipment because of the forests are so much different than they used to be. And that drives...

One of the things we found is it's very clear that a jury will hold the utility accountable. A jury will say if you didn't shut off power, if you had the opportunity, if you knew the weather event was coming, if you knew the wind was going to be blowing strongly in a dry forest and you didn't turn off the power to that line, you're liable for the damage, you're liable for those communities that burned. Suddenly we're seeing utilities facing bankruptcy because of wildfire liability, that creates a big motivation to prevent that. So utilities have turned around and are investing huge amounts of money, billions of dollars into wildfire mitigation. That does mean things like vegetation management, cutting down vegetation near the power lines. It means covering lines, so we don't have bare lines in forested areas. It means a lot more sort of automatic circuits that shut off automatically when there's disruptions and get rid of the things that turn on automatically when those things get cleared. Better weather, micro weather reporting from all over

their systems so they're better monitoring it and getting feedback instantly from their system and know what's going on. So there's a lot of investment that they're trying to make to prevent those wildfires because their systems are really, really dangerous in the environment and in the climate that we have today.

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Gosia Wozniacka (10:47)

Mm-hmm. And I should add that utilities pretty much across the West face billions in damages over their failure to prepare and leading to catastrophic wildfires, including Pacific power in Oregon, and also utilities in California, Hawaii, and Colorado. So this is becoming a big issue across the West. Should ratepayers bear the damages awarded to wildfire victims? or should shareholders?

Bob Jenks (11:24)

Yes, that's going to become a big issue. That's the biggest driver of the Pacific Power rate case. They have a rate case that the residential increase part is more than 20% now. And over half of that rate case is wildfires, a wildfire related. Some of it is cost mitigation. A large part of it is this wildfire catastrophic wildfire fund, which is really a liability fund. Let's be honest. This is to cover the the liability from the Labor Day fires and any fires that their systems have caused beyond that. One of the big questions is should customers pay for this? A court, a jury in Oregon found the company was grossly negligent and reckless. Utility rate making is done on a just and reasonable basis. Rates are



supposed to be just and reasonable. We look at cost for prudence... they have a prudence standard to determine what's just and reasonable. It's hard to reconcile a prudence standard with recklessness, with gross negligence. So there's a fundamental question whether it's legal to charge customers for those damages as well as if a court puts punitive damages on a company and that company is just allowed by regulators to pass those punitive damages on to customers, who's being punished? What's the purpose? What's the mechanism? So those are really, really serious issues. Again, the company's asking for those costs to be broadly put on customers. We're going to be pushing back and saying, no, the shareholders need to step up. We can't fully, but let's be honest, we can't fully protect customers from the costs of these things. The wildfire costs, the liability costs are causing insurance rates to go up.

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They're raising the cost of capital because to borrow money, the utilities are a greater credit risk. The utility goes into bankruptcy from these costs. It stops making investments. There's all kinds of financial consequences throughout the utility for that some of them get passed through to customers. So we can say why it's okay and we can say we shouldn't be charging customers for gross negligence and reckless. A utility that is grossly negligent and reckless with its system is going to inherently have costs come due to it that are going to float through to the customer. You can't insulate customers from a poorly managed utility that's acting irresponsibly.

Gosia Wozniacka (14:00)

Right, wow. And it sounds like we're gonna be struggling with those issues more and more as the climate gets drier and wildfires become more frequent. Another, I wanna move on to another issue that is something that we're gonna be struggling with for many, many years, which is the clean energy transition. As you mentioned, one of the costs that utilities try to recover as part of the rate cases is the cost of adding new clean energy or transmission into the grid. Oregon law requires PGE and Pacific power to reduce their carbon emissions by 80% by 2030 and by 100% by 2040. So this means the utilities have to get rid of coal, natural gas and rely 100% on clean renewable energy by 2040, pretty tall feet. So the utilities are spending a lot more on new transmission lines, wind turbines, solar farms, battery projects, battery storage projects, all in their hope to reduce emissions. And so Oregonians are very supportive, I think, in general of this transition. We all want to help reduce our contribution to climate change. But how much is this transition going to cost customers of utilities? This is significant investments that the utilities need to make to reach these state mandates. How much is this going to cost?

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Bob Jenks (15:39)

Yeah, I think that's an important question. And I think the first thing is to recognize that because we're in a transition to clean energy and utility rates are going up, people tend to connect the two and say one is caused by the other. Idaho Power has a 26% rate increase, 27% rate increase before the PUC for residential customers. They're not subject to a clean energy law here in Oregon, and Idaho doesn't have clean energy laws. So that's not what's driving their rate increase.

Pacific Core is still 50% coal. They've got a 20% rate increase before the commission for residential customers. And it's being driven by wildfires, which are caused by climate change. It's not responding to climate change. It's the fact that the climate is changing that that's causing those increases. So there are definitely lots of new investments we need to make. Some of them will push up rates. Some of the capacity costs, batteries, things like that do put upward pressure on rates. Other investments can actually lower rates. This year PGE brought on a new wind farm in Montana. That wind farm from day one is lowering rates. The capital costs, the investment costs of that are all being put into rates, but because there's no fuel costs associated with that, and it's knocking out purchase power costs, which are more expensive, and there's a bunch of tax credits from the federal government, the overall impact of that new investment is to lower rates, not to increase rates. When we closed the Boardman power plant as an alternative to retrofitting it, that saved customers \$200 million. Natural gas rates went up 40%. They came down a little bit this year. They went up 40% the two years before that.

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So there's lots of things that are causing utility rates to go up. Some like battery storage relate to clean energy. Other ones like coal and natural gas costs, which have both gone up dramatically in the last few years, are unrelated to climate change. In fact, responding with clean energy will reduce some of those costs. So I think we have to recognize that utility rates are going up.

Some of what's driving rates up is increases in electric demand. Server farms are going in throughout Oregon and in a lot of utilities territories. Those are big, big demands on the system. And they have to go out and purchase power and build transmission and build the system to do that. That's pushing up rates. Part of what's happening with Idaho power customers in Eastern Oregon is there's been tremendous load growth in Idaho, customers coming on that the utility has to suddenly go out and serve. Now the territory in Eastern Oregon hasn't grown. Only 500 new customers have been added in Eastern Oregon to idle power service territory in the last decade. But because the system is growing and incurring additional costs, those are really being spread throughout the territory. So there's a bunch of different factors. Investing in clean energy does do some upward getting out of coal can lower rates. And so we just have to be a little bit careful about assuming that the clean energy is the cause of all these rate increases.

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Gosia Wozniacka (19:03)

Got it, got it. Yeah, and I wasn't suggesting that it was the entire cause, that it was one of the pieces of the pie. One of the things with wind and solar power is that they are not always reliable sources of energy. For example, during the ice storm in January that we all still remember, we got pretty much no power from wind or solar. And battery storage, which a lot of utilities like to point to as a savior, is still a pretty nascent idea. It's very new. There isn't a lot of battery storage around the state. So is this a concern that, you know, are these goals realistic? We can add a lot of more wind

and a lot more solar, but if they're not reliable, if they're not giving us the power in those sort extreme weather moments when we need it the most, is this a concern for the future when we're going to be relying pretty much on clean energy 100% of the time?

Bob Jenks (20:10)

Yes, there is a concern and it's a current turn that I think is solvable though. Again, Oregon built flexibility into the clean energy law So if there's reliability constraints if we can't solve some of these problems then we can allow There's allowances to deal with that. So what we need is first of all, it's a diversity. That Montana wind that PGE is bringing into their system this year, when the gorge wind isn't blowing, the Montana wind likely is. The wind blows more often in Montana. A windmill in Montana will produce more wind than a windmill in the Columbia Gorge, and it blows at a different time. So that's a good resource. You're right, batteries have an important role. They do great for summer, where the summer peak is just after the sun goes down and they can take solar power from 1 p.m. in the afternoon when there's an excess and move it to nine o'clock at night where people are still running their air conditioners. So batteries do a lot in the summer. In the winter where you may have wind not blowing for two or three days, we need more than batteries. And there I do think things like Rocky Mountain wind, offshore wind may be a good resource.

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There's a lot of work going on in long duration storage. There's capacity in our hydro system that we don't utilize as effectively as we could. So there does need to be some changes. I think when the 100% Clean Law passed, we recognized that we had a pretty good handle on getting to somewhere in the 85%, 90% range. But that last little bit was going to be a bit of a challenge. But we gave ourselves 20 years to figure it out and gave off ramps and things in case we can't. So there are some challenges there. But I also think it's important to recognize that there are constraints on the energy system. And clean energy isn't the only problem there.

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You mentioned the ice storm. During the ice storm, the biggest threat to our energy systems in the Northwest was the Jackson Prairie natural gas storage facility in Washington State went down. Suddenly gas customers in one of the cold and throughout the region, one of the coldest weeks were being asked to cut back on demand. Their electric utilities were worried about whether they could get enough gas to run their peaking units to supply gas. So our fossil fuel systems are also really vulnerable and are stressed out. And some of the problems are demand and supply and transmission, all the parts of our system are just so constrained that we're closer to the edge than we would like to be in reliability. And it can be a dangerous place. But it's not just renewable systems. Our fossil fuel systems are also pretty stressed. And if they go down, we're going to see problems in the Northwest like they've seen in other parts of the country. And so what I'm hearing you say is that part of the answer is to diversify the sources of our energy and then expand the system.

Bob Jenks (23:32)

We need to diversify the system, or we need to expand the system. We need to bring in sort of new things like demand response, where we can actually work with customers to lower demand at key times. And your EV will automatically change its charging if there's too much demand on the grid and things like that. So there's a bunch of things that I think we need to do to do that. Diversifying resources is important. And then we need some technological innovation on long-term storage. It would help getting over the hump on how do you do floating offshore wind in North America. So there's innovations that are out there that everyone says is likely. There's new technology for geothermal that could produce great resources in the Western United States. So all of those things, there's lots and lots of people working on all those challenges. And the fact that we don't have all the answers today doesn't worry me as much, quite frankly, as the fact that there's just too much stuff going on.

Gosia Wozniacka (24:48)

By too much stuff, what do you mean?

Bob Jenks (24:51)

I mean, just too much demand, we're growing too fast, all the server farms going on, it's like you think we have this figured out, and then suddenly we realize, wait, we're growing 9% per year, and that hasn't happened since the really the 1960s. Suddenly there's changes in our system that are happening much more rapidly than we thought. The changes in our forests and wildfires. We didn't think wildfires were such a big problem in the Northwest till just a few years ago. So it's not, it's the problems that we anticipated with the need to diversify and bring in new technology and people are working on. I think we can solve those problems. What I worry about is the things that related to climate change and what's happening that we don't know about that we're not anticipating that that's gonna hit our systems.

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Gosia Wozniacka (25:41)

Got it, got it. And as you mentioned, the growth in customers such as data centers. But we're also going to add a lot of additional generation that we're going to be needed when everybody goes electric. So right now, only a few people, a few thousand people drive EVs. Only a few thousand or a million people have heat pumps. But eventually, everybody's going to drive an EV. Everybody's going to have a heat pump. Everything is going to be electric. That's a significant additional load. And, you know, utilities say that they need a ton more renewables, like PGE, you know, 3,500 to 4,500 megawatts of new renewable energy to avoid capacity issues by 2030. How do you add that amount of renewable energy, plus the transmission lines, which takes such a long time and are so difficult to add, to serve both the clean energy mandates, so the fact that the utility has to produce all clean energy and the additional load from EVs, heat pumps, data centers, and whatever else may come our way. How do you add that and not send the rates soaring?

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Bob Jenks (27:06)

Well, the first thing to remember, all that new load pays a rate, so it brings money with it. So we're not in a system that's growing, has new revenues coming in, that can help pay those costs. You're right, load growth is requiring we build new resources. Now, one of the questions becomes, if we didn't build renewable resources to meet that new load, could we do it cheaper through gas, or coal, or fossil fuels? And there's no evidence of that. In fact, the volatility of gas costs, the high cost of coal mining in this day, retrofitting and cleaning up coal plants, means it's almost assured that serving this load with renewable energy is going to be cheaper than the alternative. That doesn't mean that it won't affect rates, but it does mean that if you have a new load coming on.

We've got to look at the most cost-effective way to serve that. And even without our clean energy laws, it would probably be renewable energy that we would be investing in to serve that. We also need to make sure that we're getting rate structures correct. A server farm should be paying the cost of serving them. We shouldn't be subsidizing Amazon. We shouldn't be subsidizing Facebook. We shouldn't be subsidizing Apple as residential customers. The cost of that new load coming on the system should be allocated to that new load.

Gosia Wozniacka (28:27)

Hmm.

Bob Jenks (28:30)

And we shouldn't be asking other people to pick it up. So we've got to get those sorts of things right. But it is a challenge. There is a lot of resources that are going to have to be brought on in the next decade. On some of the new growth, EVs are low. If it's done properly, it's fairly flexible. I have an EV that I plug in at night where there's less demand on the system. Or I program my car to charge at night. You can also have, and PG's doing an experiment where they've got a bunch of EVs signed up where the utility manages the charging. So as the wind goes up and down at night, the charging goes up and down. And so the EVs are actually helping to integrate and manage renewables because you have intermittent resources coming onto the grid and you have flexible load on the grid.

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And those things complement each other really, really well. So EVs can be helpful on the grid at times. The heat pumps and how do we manage the electrification of some of the heating load, the movement from natural gas burning fossil fuels to heat your home to electricity. That one's, there's a challenge there, but I think the most important thing when it comes to, in my mind, the heat pumps is to recognize that an electric customer converting from resistance heat to a heat pump creates room for a couple gas customers to convert to a heat pump. If a heat pump is three times as clean as a resistance heat, then putting in a heat pump where there's resistant heat creates room for new. So part of what we have to do is make sure we're not just focused on new customers on gas conversions. But our movement to get heat pumps installed in homes is also including electric homes and folks with expensive electric resistance heating are getting the benefits of those low cost heat pumps and lowering their monthly bills and creating the room on the grid for gas conversion.

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Gosia Wozniacka (30:35)

This brings me to another sort of unpacking another piece of the pie of these high rate increases, which is usage and efficiency. So another reason why customers' bills may be going up significantly is that their usage is increasing and for some of them, their equipment isn't very efficient. So some of that is linked to extreme weather when it's very, very cold. Obviously, we use our heating equipment a lot more. When it's very, very hot, we're using our air conditioners. But then the rates are how much people are paying is very different for somebody who's got an efficient heat pump versus somebody, like you mentioned, who has the resistance heating. So I guess I'm just wondering, you know, is CUB supportive of programs to help customers reduce those costs, either through some energy efficiency measures, home energy retrofits, you know, by making homes more insulated and also this teaching customers how to conserve energy?

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Bob Jenks (32:03)

Oh, yes, we are and we have been for decades. And this is a place where I don't think people realize the success we've had in the Pacific Northwest. The average household uses more than 20% less electricity today than they did when I started in this job. Energy use per capita has gone down. Electric use has gone down. Natural gas use has gone down because we've invested in energy efficiency. We retrofitted homes. We've insulated homes. We push for new equipment. We have a whole series of programs and have for decades. And a lot of states have done that at times when suddenly they have a problem with demand, they'll invest in energy efficiency and then when that goes away they stop doing it. And that just doesn't work. You've got to do this on a continuous cycle.

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Because if suddenly you've got a constraint and energy efficiency would be a good resource, you've got to start that resource 10 years earlier. You've got to build into that resource. You've got to invest into that resource. So the fact that we use 20% less than we used to, and most of the country uses more energy than they used to. So it's not we're doing something more than everyone else. We're going in a different direction in the Pacific Northwest. And have been for two decades in the rest of the country. And that makes a real difference. We have less gas plants, we have less coal plants, we have less investment that we have to pay off in the energy system. And that keeps our rates lower. It also, because we use less, our bills are lower. When you upgrade your home, when you invest energy efficiency, your bill directly goes down and your comfort level goes down, your health can improve. So investing energy efficiency is going to be one of the keys to meeting our climate challenges in an affordable manner. And it's really important again. We've done great things in this region, but it's not it's time to not take the foot off the gas. We need to keep doing it and keep doing it and part of the reason we don't... it doesn't get highlighted as much as we've been doing it so long and so successful. I think it's just taken for granted in the background, but we shouldn't do that. We really need to recognize energy efficiency investment is one of the best, the best bangs for the buck that we get out there on our energy systems.

Gosia Wozniacka (34:27)

Interesting. And you partially answered my next question, which is, you know, energy affordability isn't obviously limited to Oregon. There's utility customers in other states also seeing significant increases. But, you know, from what I know, Oregon's rates are, like you mentioned, some of the lowest, you know, I guess I'm wondering if, you know, how we compare to others in rates and it sounds like we're going in the right direction.

Bob Jenks (35:02)

Right, I think we have to be careful about comparing state rates to state rates because we don't pay state rates, we pay utility rates. And again, we have two kinds of utilities here. We have investor-owned utilities and we have consumer-owned utilities. The consumer-owned utilities are largely fueled from Bonneville, from federal hydropower, is their primary resource, which is really low-cost hydro. So that brings our state average down. Our investor-owned utilities, the PG, Pacific or Idaho Power, their rates are lower than the national average, but not by that much. They're quickly approaching the national average if they keep raising rates the way they are. So I do think the assumption that our rates are lower than the rest of the country, we have to be careful with that. If we don't manage our rates well, if we don't invest in efficiency and make the right investments, we're going to lose that advantage.



Gosia Wozniacka (36:04)

Got it, got it. I wanna go back for a moment to PGE's recent 18% rate hike because I've heard from many an outraged customers, some people are seeing really high bills, \$400, \$500 per month, bills that have doubled. One customer actually had over \$1,000 bill that he compared to a mortgage. He said he has never seen a bill like that before. Some people are seeing smaller increases of 30, \$40. I guess I'm wondering why some folks are seeing such steep increases. Is there something in the way that the bills are calculated or things that are adding up that are the reason why the increases are so high?

Bob Jenks (37:00)

Right, right. There's a couple reasons. One is the rate increase combined with cold weather. The other issue is PG has really, really poor bill design where it's hard for people even know what their rate increase was. On the first issue is we've been warning the PUC and utilities for several years that some of these big rate hikes that they have, and they always raise rates in winter. Rates tend to change in either November or January for customers. So they always change just as we approach the winter or in the middle of winter. And that we've been warning for years that one of these times we're going to have a big rate change that's also going to come at a time of an Arctic chill. And it's going to have devastating impacts on customers. When the weather gets really cold, your bill goes up a lot. It takes a lot of energy. It takes a lot more energy to heat your home when it's 20 degrees out than when it's 40 or 50 for 24 hours a day is just a huge amount of energy that's running through your house. So you have a cold spell like we did for a week in January

and bills are gonna shoot up. You add to that an 18% rate increase and it really becomes real difficult and customers weren't prepared for it. Customers weren't prepared for the fact that they have the potential for really, really high bills.

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Gosia Wozniacka (38:09)

Got it.

Bob Jenks (38:21)

And then in PGE's case, it was made more difficult. And we were getting lots of calls from people saying, I'm looking at my bill, they say it's an 18% increase, but look, my energy charge went up 30%, my transmission charge went up 19, my distribution went up 20 some, this thing can't possibly add up to 18%. And I literally, I've been, right, and I've been doing this work for decades. I know how to read a utility bill. I literally had to create a spreadsheet and list out the charges line by line to figure out what's going on.

Gosia Wozniacka (38:21)

That's exactly what I've been hearing.

Bob Jenks (38:51)

And what's happening is, yes, energy charges went up by more than 30%, different elements of your bill went up a significant amount, but one line item on your bill completely dropped off. And that was what's called schedule 125. It's the energy update. It's really the difference between base energy charges that are set in a general rate case like we just finished and the costs that PG is incurring. So next year it'll be a... there'll be a charge for it. But this year, because we set the base, means that gets reset to zero. So there was one charge that went down to zero. And when you include that charge in, but look at somebody's bill, they can't tell that that, again, I've been doing this for decades and I was able to say, oh, that charge is from December, not from January, therefore I know that this bill, this cost dropped off in January. But... No customer or most customers are going to be able to figure that out from the bill. So bad bill design really made it impossible for folks to figure out how much the rates really went up. When I sat down with my bill, my calculation did come up to 18%. But it took me time. Again, I had to do a spreadsheet to get to that answer. And we shouldn't ever be in a situation where customers need a spreadsheet to understand what they're being charged by a utility. That's just insane.

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Gosia Wozniacka (40:08)

Right, right. What about the fixed charge on those bills? Did that go up as well? I know some of the utilities have been raising those fixed charges and that actually goes up more for folks who don't use as much energy, strangely enough.

Bob Jenks (40:27)

Yes, the fixed charges went up for customers. The utilities tend to charge a different fixed cost for single-family homes than multifamily homes, because it takes less effort, less equipment to hook up a multifamily home per household. Those went up. Those really, and people were looking at those on their bill and saying, look, this thing went up this amount. But on your bill, you can't find the fixed charge, because it's prorated over the number of days. You can't really, from seeing that before and after, you can't tell without knowing how many days of your billing period was in December and how many days were in January. But the fixed charges did go up. When we talk about an 18% increase, that included the fixed costs change. But it didn't go up as dramatically as some of the other costs.

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Gosia Wozniacka (41:06)

Got it. Okay. So don't try to read your utility bill essentially, or you'll get very frustrated.

Bob Jenks (41:37)

We should redesign the bill so the bill gives customers good information. It's the real issue. We shouldn't be, the message shouldn't be, don't read this because it tells you bad information. The real issue is how do we get good information to customers so they understand what they're being charged?

Gosia Wozniacka (41:41)

Absolutely. And I should add that PGE, perhaps, in response to this customer outrage, just expanded its income qualified bill discount program. It's now going to provide up to a 60% monthly energy discount to customers who qualify based on income. So folks should definitely inquire about that if you have a high bill and you are income qualified. And Pacific Power also has a similar program. One thing I'm wondering is: do rate payers also pay for the cost of these bill discount programs?

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Bob Jenks (42:31)

Yes, yes, the bill discount programs are, the legislature passed a law requiring these. They aren't coming out of the generosity of utilities. They're coming from direction from the legislature. And to me, they're important. It's in Oregon, we care about our neighbors. We don't want people living without electricity. And we've heard horrible stories over the years. I once got a call from an emergency medical technician who went to an elderly person's home and that person had hypothermia because they were trying to get through the winter without heat. And again, that shouldn't be happening in the 21st century. So yes, and what we do is we allow low-income customers, customers who are qualified by their income to get reduced utility bills by looking at what's their energy burden, how much of their income goes to their energy, and give them different discounts. And then we spread that cost over all ratepayers. So the impact on you or me is pretty small, but the impact on our neighbors, on the families that are struggling, that are undergoing hardship. And then we spread that across all the way through.

The effect on those folks are dramatic because they can keep the lights on, they can afford medicine, they can afford food. It makes a huge difference. The one caveat I have with those programs is there's lots of eligible people who don't know about them, who haven't signed up. And so we have to be careful about assuming because those programs exist, affordability is no longer a problem. There's a lot of folks struggling to pay their bills with those programs. And so we have to be careful about just assuming that solves the problem. We can just raise rates without worrying about the impact anymore because as well as there's a lot of folks who live paycheck to paycheck, may have high medical costs, may have other things going on in their life, but don't income qualify.

The problem is that their income, the problem is they've had huge expenses that they've got to deal with and a big rate hike is still hard for them to absorb. So those are great programs. We encourage everyone, if you're struggling, if you think you may qualify, call your utility, find out. But we also want to caution people that those programs don't mean energy affordability is no longer an issue for customers.

Gosia Wozniacka (44:58)

Hmm, absolutely. That's a great point. I think the last question I would like to ask you is, you mentioned a few flaws with regulations and also with the way that utility bills are written. There's a sort of a conundrum at the heart of the problem that investor-owned utilities don't necessarily have an incentive to keep rates low. They have an incentive to spend money. And your organization has been advocating for changes in some of the regulations. And I'm wondering if you could maybe talk about the most important policy changes that you'd like to see and in how utilities deal with these rates and their investments.

Bob Jenks (45:47)

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Yeah, I'd be glad to. When I started doing this work, utility rate making was much more straightforward. A utility would come in, ask for a rate hike. The PUC, along with input from people like me, would decide how much the utility rate should go. They would set a new utility rate, and then that would be it. The utility is expected to live with that rate until they had enough cost increases that it was starting to erode their profit margin and they were they needed to come back in to restore reasonable returns. That's not the way it operates anymore. PG got a big rate hike, they got one the year before, their rates have gone up 30 percent and what happens is cost change and they immediately file a deferral. So they contract costs, so they it's not where they allow cost changes to start to erode their earnings. Well before there's any erosion of earnings, they're asking for deferrals. They want to defer the storm related costs so they can later put those in rates. They're about to file another rate case because new costs are coming in and they want to get those. So we moved out of this idea that we establish rates and utilities live with those. And that's a really important thing to get, really important change because regulation, utilities are monopolies. They're not subject to a competitive market.

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Regulation is supposed to impose the discipline of a competitive market. If you're a business out in the competitive market and your costs change, you can't just go and change your price because you're competing against other people. The price is largely set by the market and you have to adjust your cost structures. You have to adjust your CEO pay, you have to reduce profits, you have to prioritize, you have to do things to try to manage your costs within the prices you can charge. And because we've gotten away from a sort of holistic rate making. That's no longer the case. For the utilities, it's all about cost recovery. The PUC's job is to allow them to recover their costs, not set reasonable prices for customers. And because of it, we have single issue rate making. So if a new cost comes in, the utility is going to come in and ask for recovery of that cost on an individual basis. The utilities are allowed to update some costs after the commission's already considered an issue to final order in a docket. That to me is amazing. The commission doesn't know the final price increase when it makes a decision in a rate case. Utilities get to hide information. They're talking about, I mean, PGE kept filing updates on what its cost increase was going to be this January, and I couldn't tell people. I couldn't prepare people for the cost increase that was coming, because they're saying their forecast of a cost increase is confidential. Those things just really undercut the ability for us to have an honest conversation about what's the affordable rate? Is that what's coming? And what can we do about it? The commission has tools it can use to manage this, to reduce rate shock, to spread rate increases out. But again, we're not focused on rates. We're focused on cost recovery.

Gosia Wozniacka (48:40)

That's right.

Bob Jenks (49:04)

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That just creates a much different world. And quite frankly, it's not working. In my mind, I don't think it's too dramatic to say that we've sort of corrupted the rate making process to the point that it doesn't work for customers anymore. That doesn't mean anyone's, I'm not saying any individual is, I think the process has been corrupted to the point that it's no longer about setting just at reasonable rates, which is the legal standard. It's now about giving utility cost recovery for every dollar that they spend. And that's not the right approach.

Gosia Wozniacka (49:43)

Got it. Would we need legislation to change that, or does the commission, the PUC, have already tools that would allow it to make changes?

Bob Jenks (49:56)

The Commission has tools that allow it to make changes. They have some pretty broad authority. On the other hand, if we can't do it through the Commission, the legislature passed a law a few years ago that said landlords can't increase prices more than 10% above the rate of inflation in a year. It may be that we ought to go to the legislature and ask them to say utilities can't raise rates more than 10% above inflation in a year. If we can't get discipline from the utilities, if we can't get discipline from the regulatory process, then I think it is appropriate to go to the legislature and say, you've got to impose some sort of structure that provides some sort of market discipline so utilities are constrained by the prices they charge just like any other business.

Gosia Wozniacka (50:41)

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Mm-hmm. Absolutely. Bob, this has been a really important and fascinating conversation. And we're going to be following this topic in the future. I'm sure there's going to be more rate increases to write about and analyze. So I'll drop a few links to some of the things that you mentioned in the show notes. Thank you so much, everyone, for listening to Beat Check with the Oregonian. If you like this show, please give us a five-star rating and review in Apple podcasts, it really helps people find the show. The best way to support our journalism and stories like this is with a subscription to Oregon Live. You can do that at [oregonlive.com](https://oregonlive.com) slash pod support. Until next time, thank you.

Bob Jenks (51:26)

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## BUSINESS

# PGE rates are up 31% since 2022. The surge may continue

The trend of rising utility fees raises further questions about regional affordability, long a Portland competitive advantage over other West Coast urban areas.



*Credit: AP Photo/Jenny Kane, File)*

A worker from Portland General Electric replaces a power line as crews worked to restore power after a storm on Jan. 16, 2024, in Lake Oswego, Ore.

Author: Pete Danko Portland Business Journal

Published: 2:21 PM PDT March 20, 2024

Updated: 2:23 PM PDT March 20, 2024



PORTLAND, Ore. — Just as nobody thinks about electricity service until the power fails, rates don't get much attention until they go up. Then there's hell to pay.

Oregon's two major investor-owned electric utilities are finding that out. After a long run with prices only creeping higher, Portland General Electric and PacifiCorp's [Pacific Power utility](#) face an uproar [over big spikes](#) and the [prospect of more](#).

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PGE (NYSE: POR), the state's largest electricity provider, felt a particular sting last week when the Citizens' Utility Board asked regulators to [scrap the company's proposed 7.4% increase](#) for 2025.

The residential ratepayer watchdog inevitably works to trim increases in the long, public ratemaking process, but its [quick call to trash PGE's proposal](#) was unprecedented. CUB's leadership, noting that PGE's request would push rates more than 40% above where they stood in 2022, said the toll on customers was simply too much.

It's a trend that raises further questions about regional affordability, long a Portland competitive advantage over other West Coast urban areas. Expensive housing, [high taxes](#) and the cost of various city, county and Metro services have already chipped away at that reputation. Now, once comparatively reasonable electricity rates appear under threat as big investments to tackle decarbonization, wildfire risk, [increasing demand](#) and [transmission hurdles loom](#).

It's put a sharp focus on PGE, which provides power to most of the city and nearly all its suburbs. It's not a city bureau like Portland Water (whose rates are also climbing), but to a large degree and in spirit and perception it's Portland's electric company.

PGE executives say they're doing what's needed to deliver the emissions-free, reliable electricity system that customers and [policy makers have demanded](#).

*The Portland Business Journal, a KGW news partner, has more on the situation here.*

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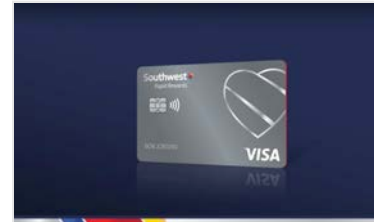
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# **Attachment B**



# Why Are PGE Bills Increasing in 2024?

Posted on January 11, 2024 by **Charlotte Shuff**

Tags, **Oregon Utilities 101**, **Energy**, **General Interest**



Customers of Portland General Electric (PGE) saw billing rates increase on January 1, 2024. This 18% increase is the largest in more than 20 years. An average household can expect an average of \$22 per month more on their PGE bill. This is on top of a rate increase on January 1, 2023. Combined the two increases mean bills in January 2024 are 30% higher than bills 13 months ago, in December 2022.

02/12/24 | 4 Comments | [Why Are PGE Bills Increasing in 2024?](#)

## Comments

1. How do I sign up for the newsletter? Every link I click on produces an empty page.

Many people in my area were without power for a full week during the Arctic Blast due to insufficient staff attending to outages. They are left with significant damages to their homes from burst pipes and downed trees. Meanwhile, their utility rates are up again and Patti Poppe earns over 50 million annually. Where's the justice?

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Vicki Zeitner | January 2024

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2. Thank you for finally getting me on line! You could save coins now by not sending me reports by USPS. Failing vision causes most to end up in waste.

We heat our one level "ranch" home with electric and wood. With recent increase our "equal pay" will now top \$300. Mo.

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Adele Richey McMurry | February 2024

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3. My bill went up over 25% due to the rate increase. One-level ranch home (1000 sq ft) with energy efficient appliances and heat pump/mini-split. No other source of energy for the home. We are now at \$275-300/month. When we moved in 10 years ago, monthly bill was \$75-100. We had never approached \$200 until last year. I don't know how it is okay to increase rates so drastically on people during tough economic times. Energy and water are necessary services that should be kept at reasonable costs.

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Kristen P | February 2024

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4. Our apartment complex was without power for a total of 7 days during that January ice blast, and yet I get a bill adding \$145 dollars to my usual \$75? Just in December of 2023 when I had all the heaters going my bill just topped out at \$90 with no power outages so how does PGE and Oregon justify this?

It seems Oregon's politicians has adapted a plan to force those making less than \$100K a year to move out of the state!

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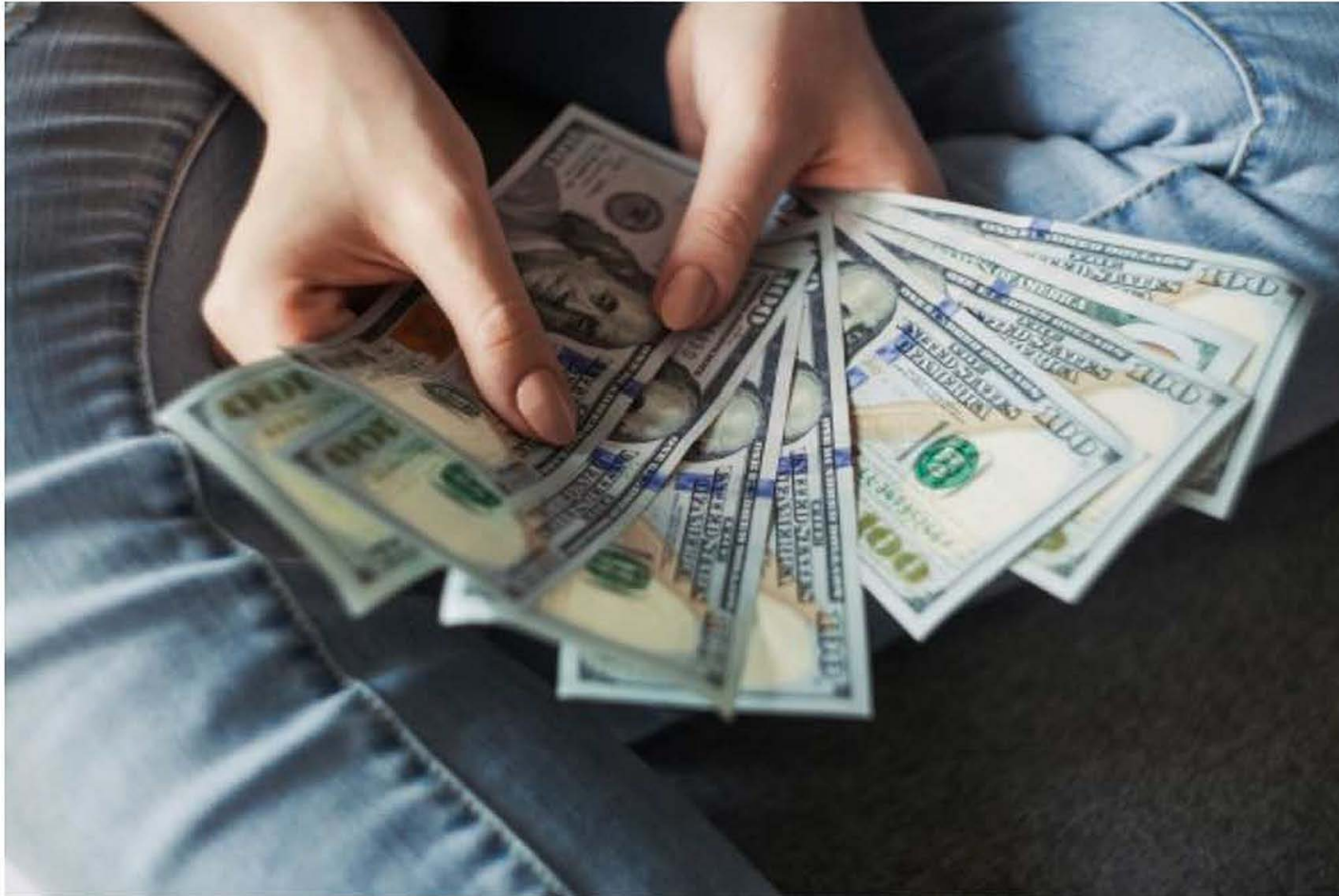
Gregory Alexander | March 2024

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# PGE Asks for Even More Rate Increases

Posted on March 5, 2024 by **Charlotte Shuff**

Tags, **Oregon Utilities 101**, **Energy**, **General Interest**



Despite an 18% increase in January, skyrocketing bills, and heavy outcry from customers, Portland General Electric is asking for another rate increase. PGE is requesting an increase of \$202 million or 7.2% for residential customers on January 1, 2025.

03/11/24 | 4 Comments | **PGE Asks for Even More Rate Increases**

## Comments

1. 100%. Enough is enough!

Over the past year I have made huge investments in my HVAC systems to reduce energy use. I have added multiple mini split systems in all my living spaces so I can heat and cool individual rooms as needed and augment the system with my central system as required such as during really cold days. I am now using much less gas during the cold months and increased my electricity usage but compared to prior years, my combined gas and electricity energy usage has gone down and yielded a net financial savings. These PGE rate increases compounded and far outpacing any inflation rate we are experiencing. I would love to invest in an industry that can yield 9%-18% return each year. Remember these rate increases by PGE are compounded compared to prior years. For example if you get a rate increase of 8%, 18%, and 9.75% over three years the cumulative increase is  $(8\%+18\%+9.75\%) = 35.75\%$  but reality is these rate increases are compounded so it's really  $1.08*1.18*1.0975=1.3987$ . Meaning you will be paying 39.87% higher than before the three rate increases. I do not believe wages and salaries can keep up with that kind of increase. If we were to lock PGE to any permanent rate increase we should tie it to the CPI.

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Bob | March 2024

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2. Power is an essential need, not a luxury.

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Christian Dolan | March 2024

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3. This is what happens when a utility is a private corporation, not a public utility. Corporations prime directive is profit, not service. Shareholders are not civic-minded about their profits.

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J. Michael Albrich | March 2024

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4. Why cant we have a choice of electricity providers like in other countries. This is what happens when you have a private company operating as a monopoly. Very poor service (five days without power and no text updates or information ever during that period), very inefficient and overpriced. Its time we had a choice of providers.

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Johan. | March 2024

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# **Attachment C**

PGE	Jan 2023	Feb 2023	March 2023	April 2023	May 2023	June 2023	July 2023	Aug 2023	Sept 2023	Oct 2023	Nov 2023	Dec 2023
shut offs	3,249	1,356	4,188	1,313	1,933	4,353	201	2,524	1,976	3,249	1,824	1,241
residential customers	814,505	813,954	814,335	813,771	814,528	815,029	814,996	816,133	816,703	817,937	819,522	820,631
energy asst accts shut off	420	164	480	157	219	451	22	334	211	301	144	85
medical certificate holder accounts shut off	15	6	5	5	5	16	0	1	8	10	3	2
folks who are both 5 and 6	1	1	0	2	2	3	0	0	2	2	0	1
<b>2023 total residential shut offs</b>	<b>27,407</b>											
<b>total customers shut off who receive energy asst</b>	<b>2988</b>											
<b>total customers who have med certificates and are shut off</b>	<b>76</b>											

Data retrieved from PGE monthly filings in RO 12, *In the Matter of Energy Utility Quarterly Report of Residential Disconnections for non-payment and subsequent reconnections per OAR 860-021-0408:*

<https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=21694>

## **Attachment D**



**Portland General Electric**  
121 SW Salmon Street • Portland, OR 97204  
portlandgeneral.com

Attachment D 1

March 25, 2024

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street, S.E.  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: UM 2315 Investigation into Comprehensive Deferral and Adjustment Tracking**

Portland General Electric Company (PGE) submits the enclosed in accordance with Administrative Law Judge Nolan Moser's March 6, 2024 Ruling requesting Deferral and Adjustment Tracking in the provided template.

Please direct any questions regarding this filing to Stephen Leeb at [stephen.leeb@pgn.com](mailto:stephen.leeb@pgn.com)  
Please direct all formal correspondence and requests to the following email address  
[pgc.opuc.filings@pgn.com](mailto:pgc.opuc.filings@pgn.com)

Sincerely,

*\s\ Jaki Ferchland*

Jaki Ferchland  
Senior Manager, Revenue Requirement

Enclosure



Description	Regular annual filing schedule (y/n)	Filing Date	Rate Effective Date	Rate adjustment mechanism type (AAC, etc)	Schedule # (if applicable)	Associated deferral (docket #)	Currently in use (y/n)	Notes
Bonneville Regional Power Exchange Credits	n	n/a	1/1/2025	Required rate adjustment	102	n/a	y	This is typically filed every two years with a BPA rate case, can also change if needing to amortize balance due to actual customer loads being materially different from the forecast.
Metro Supportive Housing Services Business Income Tax Recovery	y	11/15/2024	1/1/2025	AAC	103	UM 2131	y	
Regulatory Adjustments	y	11/15/2024	1/1/2025	Deferral, with one AAC	105	1991, UM 2064, UM 1301, UM 1	y	
Multnomah County Business Income Tax	y	11/15/2024	1/1/2025	AAC	106	UM 1986	y	
Public Purpose Charge	n	n/a	n/a	Required rate adjustment	108	n/a	y	This is only updated when dictated by statute.
Energy Efficiency Funding Adjustment	y	2/14/2025	4/1/2025	Required rate adjustment	109	n/a	y	This is a pass through the ETO and required by statute. Current rates will be effective 4/1/24.
Energy Efficiency Customer Service	n/a	n/a	n/a	AAC	110	UM 2039	n	This is in base rates as of 1/1/24.
Low Income Assistance	n	not anticipated in 2024	n/a	Required rate adjustment	115	n/a	y	
Bill Adjustment Cost Recovery Mechanism	y	11/15/2024	1/1/2025	AAC	118	UM 2219	y	
Renewable Resources Automatic Adjustment Clause	n	Mar-24	4/1/2025	AAC	122	UM 2306	n	This rate schedule was originally filed with a July effective date. If the Commission accepts the settlement reached with parties, the rate will be effective April 1, 2024.
Decoupling Adjustment	y	n/a	1/1/2024	Deferral	123	UM 1417	y	This version of decoupling will conclude at the end of 2024 and a new decoupling proposal, docketed as UE 432 is currently going through Commission process and may be effective at a later date.
Annual Power Cost Update	y		n/a	AAC	125	UM 1988	y	Integrated into base rates when rate case is effective.
Annual Power Cost Variance Mechanism	n	n/a	n/a	AAC	126	UM 1294	y	This rate adjustment is only filed when the parameters of the PCAM indicate a refund or collection.
Short Term Transition Adjustment	y	2/15/24, 11/15/24	4/1/24, 1/1/25	Transition adjustment	128	n/a	y	Only applicable to customers who elect service on Short Term Direct Access. There are two election windows for which there are separate rates, depending on when the customer opts out.
Long Term Transition Adjustment	y	7/1/24, final 8/30/24	1/1/2025	Transition adjustment	129	n/a	y	Only applicable to customers that opt out of cost of service in the long term.
Oregon Corporate Activities Tax	n	11/15/2024	1/1/2025	AAC	131	UM 2037	y	Currently amortizing a balance, the rate will be set to 0 on January 1, 2025 and the schedule will no longer be needed.
Demand Response Cost Recovery Mechanism	y	11/15/2024	1/1/2025	AAC	135	UM 2234, UM 1827, UM 1514	y	
Oregon Community Solar Program Cost Recovery Mechanism	y	11/15/2024	1/1/2025	AAC	136	UM 1977	y	
Customer Owned Solar Payment Option Cost Recovery Mechanism	y	11/15/2024	1/1/2025	AAC	137	UM 1482	y	
Energy Storage Cost Recovery Mechanism	y	11/15/2024	1/1/2025	AAC	138	UM 2078	y	
New Large Load Transition Cost Adjustment	n	n/a	n/a	Transition adjustment	139	n/a	y	Only applicable to customers who elect service on new load direct access. This rate schedule is only adjusted with changes to fixed generation.
Spent Fuel Adjustment	n	n/a	n/a	n/a	143	UM 1186	n	
Boardman Power Plant Decommissioning Adjustment	y	11/1/2024	1/1/2025	AAC	145	n/a	y	
Colstrip Power Plant Operating Life Adjustment	y	11/1/2024	1/1/2025	AAC	146	n/a	y	
Environmental Remediation Cost Recovery Adjustment Automatic Adjustment Clause	n/a	tbd	tbd	AAC	149	UM 1789	n	Rates are currently set to 0 and PGE will amortize when needed.
Transportation Electrification Cost Recovery Mechanism	y	11/15/2024	1/1/2025	AAC	150	UM 2218, UM 1938, UM 2003	y	
Wildfire Mitigation Cost Recovery	y	tbd	tbd	AAC	151	UM 2019	y	The filing schedule for this is still being discussed.
Major Event Cost Recovery	n	n/a	1/1/2024	Deferral	152	UM 2156, UM 2064, UM 2115	y	
Community Benefits and Impact Advisory Group Cost Recovery Mechanism	y	11/15/2024	1/1/2025	AAC	153	UM 2249	y	

UM 2315 Investigation into Comprehensive Deferral and Adjustment Tracking  
PGE Response - Page 2

Attachment D 3

Deferral										Amortization											
Description of costs/revenues	Docket #	Initial/ reauthorization	Date Filed	Deferral Period	Authorized /Pending	Date Authorized	Reauthorization anticipated (y/n)	Calendar Year	Amounts deferred (\$ by deferral period)	Applicable interest rate	Accrued interest (to date)	Current balance (total \$)	Amortization ongoing (y/n)	Applicable interest rate	Amortization term	Amortization request pending (y/n)	Anticipated			Associated with recurring filing (y/n)	
																	Amortization request (approx date)*	Amortization schedule/method	Schedule # (if applicable)		Most recent Advice filing #
Intervenor Funding	UM 1103	Reauthorization	6/30/2023	6/30/2024	Pending		Y	2023	\$ 673,700	5.13%	\$ 56,172	\$ 899,658	N	5.13%	One Year	N	1/1/2025	Deferral	Sch 105	23-27	Y
Power Cost Adjustment Mechanism	UM 1294	Reauthorization	12/28/2023	12/31/2024	Pending		Y	2023	\$ -	1.82%	\$ 1,178,210	\$ 15,968,926	Y	1.82%		N	1/1/2025	Deferral	Sch 126		Y
Direct Access Open Enrollment	UM 1301	Reauthorization	12/28/2023	12/31/2024	Pending		Y	2023	\$ (2,715,255)	5.13%	\$ (76,952)	\$ (2,741,131)	Y	5.13%	One Year	N	1/1/2025	Deferral	Sch 105	23-27	Y
PV Volumetric Incentive Rate	UM 1482	Reauthorization	5/26/2023	5/26/2024	Pending		Y	2023	\$ (2,566,118)	1.47%	\$ (24,566)	\$ 105,780	Y	1.47%	One Year	N	1/1/2025	AAC	Sch 137	ADV 23-36	Y
Non-Residential Direct Load Control	UM 1514	Reauthorization	12/29/2023	12/31/2024	Pending		Y	2023	\$ (529,892)	5.13%	\$ (17,211)	\$ (835,495)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 135	ADV 23-30	Y
Environmental Remediation and Portland Harbor	UM 1789	Reauthorization	7/19/2023	7/19/2024	Authorized	12/29/2023		2023					N				TBD		Sch 149	N/A	Y
Demand Response Water Heater Pilot	UM 1827	Reauthorization	12/29/2023	12/31/2024	Pending		Y	2023	\$ (1,598,918)	5.13%	\$ (16,549)	\$ (1,098,199)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 135	ADV 23-30	Y
Major Maintenance Expenses	UM 1915	Reauthorization	12/31/2023	12/31/2024	Authorized		Y	All	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Base Rates	Base Rates	N/A	Y
Transportation Electrification	UM 1938	Reauthorization	4/25/2023	4/22/2024	Authorized	7/13/2023	Y	2023	\$ 475,077	5.13%	\$ (11,954)	\$ (226,009)	N	5.13%	One Year	N	TBD	Deferral	Sch 150	ADV 23-33	Y
CEI Customer Touchpoints	UM 1948	Initial	5/11/2018	5/11/2019	Pending		N	2018					N				N/A				N
Community Solar	UM 1977	Reauthorization	11/7/2023	11/7/2024	Pending		Y	2023	\$ (794,433)	5.13%	\$ 116,524	\$ 1,115,391	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 136	ADV 23-34	Y
MCBT Balancing Account	UM 1986	Reauthorization	12/6/2023	12/6/2024	Pending		Y	2023	\$ (100,382)	5.13%	\$ (32,965)	\$ (219,618)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 106	ADV 23-25	Y
QF CODs	UM 1988	Reauthorization	12/28/2023	12/31/2024	Pending		Y	2023	\$ 648,000	5.13%			Y	5.13%				Deferral	Sch 201		Y
R&D Tax Credits	UM 1991	Reauthorization	12/14/2023	12/17/2024	Pending		Y	2023	\$ (1,523,394)	5.13%	\$ 7,279	\$ (907,501)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 105	ADV 23-37	Y
EV Charging Pilots	UM 2003	Reauthorization	2/22/2024	2/21/2025	Pending		Y	2023	\$ (227,189)	5.13%	\$ (3,764)	\$ (599,146)	Y	5.13%	One Year	N	TBD	AAC	Sch 150	ADV 23-33	Y
Wildfire Risk Mitigation Measures	UM 2012	Reauthorization	12/29/2023	12/31/2024	Authorized	2/8/2024	Y	2023	\$ 23,970,497	6.13%	\$ 1,985,624	\$ 26,928,103	Y	6.13%	One Year	Y	TBD	AAC	Sch 151	ADV 23-16	Y
Energy Efficiency Customer Service	UM 2059	Reauthorization	12/6/2023	12/31/2023	Pending		Y	2023	\$ (626,538)	5.13%	\$ (70,469)	\$ (1,252,806)	Y	5.13%	One Year	N	N/A	AAC	Sch 130	ADV 23-33	Y
OPUC Regulatory Fee	UM 2046	Reauthorization	12/29/2023	12/31/2024	Pending		Y	2023	\$ 1,486,333	5.13%	\$ 90,143	\$ 1,513,262	Y	5.13%	One Year	N	1/1/2025	Deferral	Sch 105	ADV 23-37	Y
Residential Battery Energy Storage	UM 2076	Reauthorization	4/24/2023	4/20/2024	Pending		Y	2023	\$ (361,349)	5.13%	\$ (6,573)	\$ (316,261)	N	5.13%	One Year	N	1/1/2025	AAC	Sch 138	ADV 23-21	Y
BPSC Microgrid Storage	UM 2113	Reauthorization	8/31/2023	8/31/2024	Pending		Y	2023	\$ 22,110	5.13%	\$ 38,037	\$ 102,083	N	5.13%	One Year	N	1/1/2025	AAC	Sch 138	ADV 23-21	Y
Metro Supportive Housing Services Tax	UM 2131	Reauthorization	12/28/2023	12/31/2024	Pending		Y	2023	\$ 330,973	5.13%	\$ (7,975)	\$ 317,222	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 103	ADV 23-24	Y
TC Charge Deferral (0.25%)	UM 2218	Reauthorization	12/28/2023	12/31/2024	Pending		Y	2023	\$ (3,757,049)	5.13%	\$ (415,016)	\$ (10,376,102)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 150	ADV 23-13	Y
Energy Affordability Act Deferral - IQBD	UM 2219	Reauthorization	12/28/2023	12/31/2024	Pending		Y	2023	\$ 21,512	1.82%	\$ 39,363	\$ (130,651)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 118	ADV 23-28	Y
Flexible Load Plan - DR pilots	UM 2234	Reauthorization	12/29/2023	12/31/2024	Pending		Y	2023	\$ (2,089,526)	5.13%	\$ (159,901)	\$ (3,126,079)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 135	ADV 23-30	Y
Community Benefits & Impacts Advisory Group	UM 2249	Reauthorization	8/16/2023	8/15/2024	Authorized	12/29/2023	Y	2023	\$ (562,784)	5.13%	\$ (5,300)	\$ (3,174,437)	Y	5.13%	One Year	N	1/1/2025	AAC	Sch 153	ADV 23-32	Y
2023 RFP Costs for 3rd Party Consultants	UM 2281	Initial	4/21/2023	4/21/2024	Authorized	9/11/2023	Y	2023	N/A	N/A	N/A	N/A	N	N/A	N/A	N	1/1/2025	Deferral	Sch 105	ADV 23-37	Y
Clearwater Wind Project Costs	UM 2305	Initial	10/31/2023	10/31/2024	Pending		Y	2023	N/A	N/A	N/A	N/A	N	N/A	N/A	Y	1/1/2025	AAC	Sch 123	ADV 23-30	N
Washington Climate Change Act Carbon Compliance	UM 2308	Initial	12/19/2023	12/31/2024	Pending		Y	2024	N/A	N/A	N/A	N/A	N	N/A	N/A	N	1/1/2025	Deferral	Sch 125	N/A	Y
Sales Normalization Adjustment Revenue Treatment	UM 2313	Initial	1/8/2024	12/31/2024	Pending		Y	2023	N/A	5.13%	\$ 155,480	\$ 4,503,842	Y	5.13%	One Year	N	TBD	Deferral	Sch 123	ADV 24-01	Y
Wildfire Emergency Costs and Lost Revenues	UM 2115	Reauthorization	9/14/2021	9/9/2022	Authorized	3/11/2022	N	2023	\$ -	5.20%	\$ 1,590,984	\$ 28,527,497	Y	5.20%	Seven Years	N	N/A	Deferral	Sch 152	ADV 23-29	N
Emergency Restoration Costs - Ice	UM 2156	Initial	2/15/2021	2/14/2022	Authorized	1/26/2022	N	2023	\$ -	5.20%	\$ 3,609,425	\$ 68,601,264	Y	5.20%	Seven Years	N	N/A	Deferral	Sch 152	ADV 23-29	N
COVID	UM 2064	Reauthorization	3/21/2022	3/22/2023	Authorized	5/10/2022	N	2023	\$ -	5.22%	\$ 982,173	\$ 15,696,953	Y	5.22%	Two Years	N	N/A	Deferral	Sch 152	ADV 23-29	N
Boardman	UM 2119	Reauthorization	10/4/2021	10/7/2022			N	2023	\$ (6,500,000)	4.74%	\$ (139,387)	\$ (5,117,123)	Y	4.74%	Two Years	N	N/A	Deferral	Sch 152	ADV 23-29	N

Docket #	Notes
UM 1303	This is not amortized each year if the overall balance for all intervenor funding is low.
UM 1294	Subject to filing depending on applicable deadband and sharing mechanisms for actual power cost.
UM 1301	
UM 1482	This uses a balancing account and depending on the level of the balance, PGE may update the tariff to collect a different amount. For example, January 2024 was the first time the rate was adjusted in two years.
UM 1514	
UM 1789	
UM 1827	
UM 1515	Major Maintenance amounts are only established in a general rate case.
UM 1938	Proposing to include in base rates beginning in 2025 in UE 435.
UM 1948	Pursuant to Commission Order No. 17-511, parties agree to move the unamortized CET deferred costs into a supplemental schedule (Sch112) for amortization. The supplemental schedule amortized the 2014-2016 deferral balance and the 2017 and 2018 costs over 5 years beginning in 2018, with interest accruing at the modified blended treasury rate for 2018 (2.02%). While schedule 112 was active in January 2023, no remaining balance needs to be amortized and this is no longer an active deferral.
UM 1977	
UM 1986	
UM 1988	Commission approved CF COD track and true up mechanism, where the difference between a cost associated with forecasted and actual CF Online dates is deferred and included in PGE's next scheduled NVPC forecast. See Order 23-493.
UM 1991	
UM 2003	Proposing to include in base rates beginning in 2025 in UE 435.
UM 2019	
UM 2039	Moved into base rates Jan 1, 2024.
UM 2046	Reauthorized 12/31/2023 because potential increase possible in Feb 2024.
UM 2078	
UM 2113	
UM 2131	
UM 2218	
UM 2219	
UM 2234	
UM 2249	
UM 2281	
UM 2306	Expected amortization in 2025, but see also related docket, UE 437.
UM 2308	This will be associated with a recurring filing (Sch 125) but the first deferral period has not concluded yet and is for calendar year 2024.
UM 2313	Decoupling ended during 2022, so there are no actual deferred amounts for 2023.
UM 2315	
UM 2356	
UM 2064	
UM 2119	

\*PGE typically updates its pricing for these schedules on Jan 1, so the default date is 1/1/25. During a review in September of 2024, PGE will evaluate the status of the schedule and will determine if a new rate will be needed.

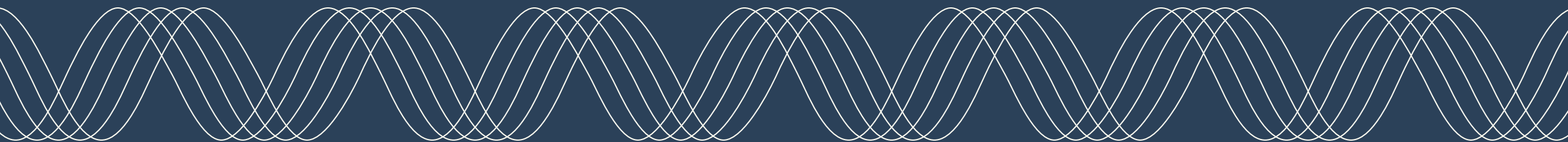
## **Attachment E**



# Investor Presentation

**PORTLAND GENERAL ELECTRIC**

**March 12, 2024**





# Cautionary statement

## Information Current as of February 20, 2024

Except as expressly noted, the information in this presentation is current as of February 20, 2024 - the date on which PGE filed its Annual Report on Form 10-K for the year ended December 31, 2023 - and should not be relied upon as being current as of any subsequent date. PGE undertakes no duty to update this presentation, except as may be required by law.

## Forward-Looking Statements

This presentation contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Forward-looking statements are based on assumptions about the future, involve risks and uncertainties, and are not guarantees. Future results may differ materially from those expressed or implied in any forward-looking statement. These forward-looking statements represent our estimates and assumptions only as of the date set above. The company assumes no obligation to update or revise any forward-looking statement as a result of new information, future events or otherwise.

Forward-looking statements include statements regarding the Company's full-year earnings guidance (including assumptions and expectations regarding annual retail deliveries, average hydro conditions, wind generation, normal thermal plant operations, operating and maintenance expense and depreciation and amortization expense) as well as other statements containing words such as "anticipates," "assumptions," "based on," "believes," "conditioned upon," "considers," "could," "estimates," "expects," "forecast," "goals," "intends," "needs," "plans," "predicts," "projects," "promises," "seeks," "should," "subject to," "targets," "will continue," "will likely result," or similar expressions.

Investors are cautioned that any such forward-looking statements are subject to risks and uncertainties, including, without limitation: the timing or outcome of various legal and regulatory actions; changing customer expectations and choices that may reduce demand for electricity; the sale of excess energy during periods of low demand or low wholesale market prices; operational risks relating to the Company's generation and battery storage facilities, including hydro conditions, wind conditions, disruption of transmission and distribution, disruption of fuel supply, and unscheduled plant outages, which may result in unanticipated operating, maintenance and repair costs, as well as replacement power costs; delays in the supply chain and increased supply costs (including application of tariffs impacting solar module imports), failure to complete capital projects on schedule or within budget, failure of counterparties to perform under agreement, or the abandonment of capital projects, which could result in the Company's inability to recover project costs, or impact our competitive position, market share, revenues and project margins in material ways; default or nonperformance of counterparties from whom PGE purchases capacity or energy, which require the purchase of replacement power and renewable attributes at increased costs; complications arising from PGE's jointly-owned plant, including ownership changes, regulatory outcomes or operational failures; the costs of compliance with environmental laws and regulations, including those that govern emissions from thermal power plants; changes in weather, hydroelectric and energy market conditions, which could affect the availability, cost and required collateral for purchased power and fuel; changes in capital and credit market conditions, including volatility of equity markets, reductions in demand for investment-grade commercial paper or interest rates, which could affect the access to and availability or cost of capital and result in delay or cancellation of capital projects or execution of the Company's strategic plan as currently envisioned; general economic and financial market conditions, including inflation; the effects of climate change, whether global or local in nature; unseasonable or severe weather conditions, wildfires, and other natural phenomena and natural disasters that could result in operational disruptions, unanticipated restoration costs, third party liability or that may affect energy costs or consumption; the effectiveness of PGE's risk management policies and procedures; PGE's ability to effectively implement Public Safety Power Shutoffs (PSPS) and de-energize its system in the event of heightened wildfire risk; cyber security attacks, data security breaches, physical attacks and security breaches, or other malicious acts, which could disrupt operations, require significant expenditures, or result in claims against the Company; employee workforce factors, including potential strikes, work stoppages, transitions in senior management, and the ability to recruit and retain key employees and other talent and turnover due to macroeconomic trends; widespread health emergencies or outbreaks of infectious diseases such as COVID-19, which may affect our financial position, results of operations and cash flows; failure to achieve the Company's greenhouse gas emission goals or being perceived to have either failed to act responsibly with respect to the environment or effectively responded to legislative requirements concerning greenhouse gas emission reductions; social attitudes regarding the electric utility and power industries; political and economic conditions; acts of war or terrorism; changes in financial or regulatory accounting principles or policies imposed by governing bodies; changes in effective tax rate; and risks and uncertainties related to All-Source RFP projects, including, but not limited to, regulatory processes, transmission capabilities, system interconnections, permitting and construction delays, legislative uncertainty, inflationary impacts, supply costs and supply chain constraints. As a result, actual results may differ materially from those projected in the forward-looking statements.

Risks and uncertainties to which the Company are subject are further discussed in the reports that the Company has filed with the United States Securities and Exchange Commission (SEC). These reports are available through the EDGAR system free-of-charge on the SEC's website, [www.sec.gov](http://www.sec.gov) and on the Company's website, [investors.portlandgeneral.com](http://investors.portlandgeneral.com). Investors should not rely unduly on any forward-looking statements.

## Investor Relations Contacts

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### Sydnie Hinds

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[Sydnie.Hinds@pgn.com](mailto:Sydnie.Hinds@pgn.com)

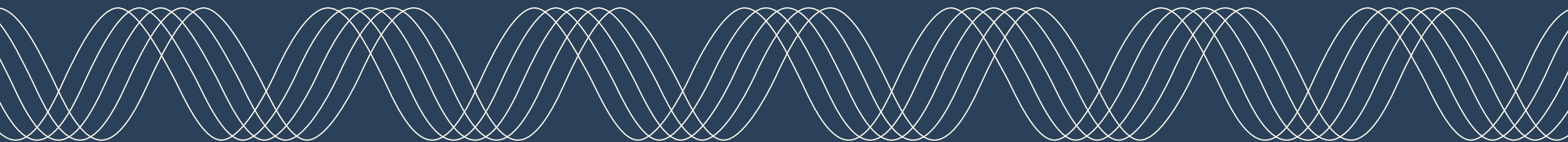
## Portland General Electric

[investors.portlandgeneral.com](http://investors.portlandgeneral.com)

121 SW Salmon Street  
Suite 1WTC0506  
Portland, OR 97204



# The Company





# PGE at a glance

## Quick facts

- Vertically integrated energy company that generates, transmits and distributes electricity
- Approximately 934,000 retail customers within a service area of approximately 1.9 million residents<sup>(1)</sup>
- Roughly half of Oregon's population lives within PGE service area, encompassing 51 incorporated cities entirely within the State of Oregon
- Roughly two-thirds of Oregon's commercial and industrial activity occurs in PGE service area

## Leading the way to a clean energy future for Oregon

- Our goals align with the 100% clean energy by 2040 framework. The targets to reduce baseline greenhouse gas emissions from power served to Oregon retail customers are:
  - 80% reduction in greenhouse gas emissions by 2030
  - 90% reduction in greenhouse gas emissions by 2035
  - 100% reduction in greenhouse gas emissions by 2040

(1) As of December 31, 2023

(2) In 2023, GAAP net income was \$228 million, or \$2.33 per diluted share. After adjusting for the impacts of Boardman revenue requirement settlement charge, non-GAAP net income was \$233 million, or \$2.38 per diluted share. The net effect of the deferral release was \$0.05 per diluted share (see appendix for important information about non-GAAP measures, guidance, and reconciliations)

## 3,500+ MWs of Generation



## Financial snapshot

- 2023 revenue: \$2.9 billion
- 2023 diluted earnings per share: \$2.33 GAAP, \$2.38 adjusted non-GAAP<sup>(2)</sup>
- Net utility plant assets: \$8.6 billion<sup>(1)</sup>





# Investment thesis

## Investing in a reliable and clean energy future

- Adopting 100% clean energy by 2040 framework
- Entered into agreements for 475 MW of battery storage and 500 MW of hydro contracts; 2,700 to 3,700 MW of additional non-emitting resources remain to be procured through multi-stage RFP processes through 2030

## High-growth service area

- Urban service territory with strong growth in high-tech industrial segment
- Growing number of customer connects and 2% long-term load growth, through 2027

## Building a smarter more resilient grid

- Investing in our system to maintain and increase resiliency to mitigate against extreme weather and wildfires
- Modernizing our grid with a community-centered distribution system to advance environmental justice, accelerate distributed energy resources and maximize grid benefits

## Constructive regulatory environment

- Regulatory mechanisms to recover costs and add renewables, including a Renewable Adjustment Clause, Wildfire Mitigation Automatic Adjustment Clause and forward test year
- Vertically integrated, regulated utility

## Focusing on operational effectiveness and efficiency

- 5% to 7% long-term EPS growth<sup>(1)</sup> and dividend growth guidance<sup>(2)</sup>
- Improved key safety and reliability metrics
- Continuing to implement efficiencies and manage costs through technology

## Delivering exceptional customer experiences

- No. 1 ranked renewable power program in the United States for 14 years<sup>(3)</sup>
- Ranked as a Top 5 Utility in the United States for Customer Experience according to Forrester's The US Customer Experience Index for 3 consecutive years<sup>(4)</sup>

(1) Long-term EPS growth base year is 2022 adjusted results

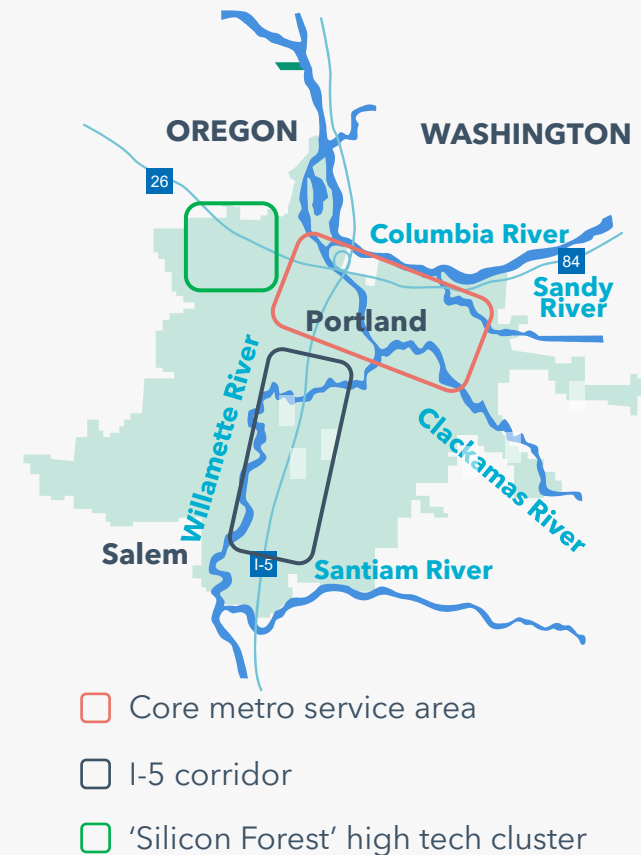
(2) The amount and timing of dividends payable and the dividend policy are at the sole discretion of the Portland General Electric Board of Directors and, if declared and paid, dividends may be in amounts that are materially less than projected. EPS estimates and projections are based on assumptions and there can be no assurance regarding the amount of future earnings consistent with earnings guidance

(3) National Renewables Energy Laboratory. NREL did not release rankings in 2011

(4) Forrester's The US Utilities Customer Experience Index Rankings, 2023

# Diverse, growing service area

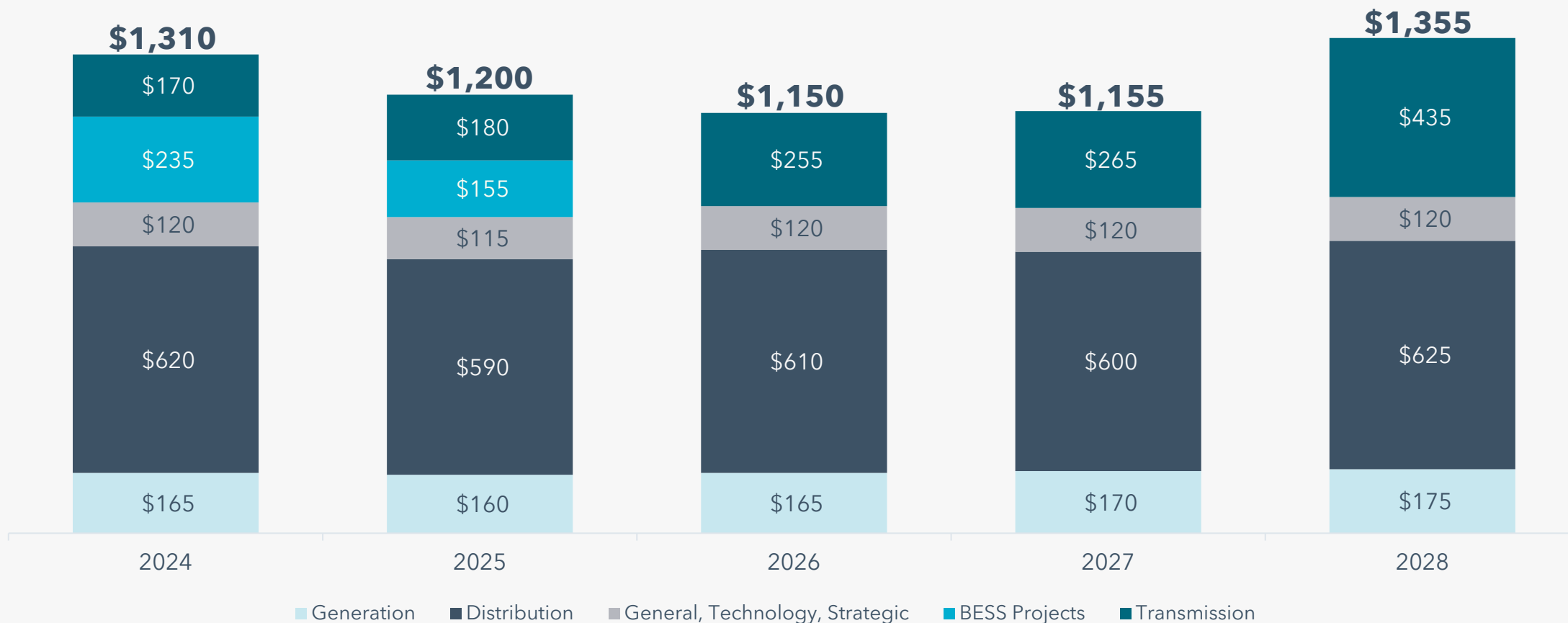
- Growing **core urban service area** with strong population growth supporting services (government, education, restaurants, healthcare, and other services)
- **I-5 corridor** and port access provide opportunity for transportation and warehousing and market access for traditional manufacturing (wood products, food, metals)
- **'Silicon Forest' high tech cluster** includes R&D and component manufacturing. Hillsboro fiber infrastructure provides unique opportunity for continued growth connected to AI expansion, including data center and high-tech development. Companies with operations in PGE's service territory include Intel, Lam Research, Analog Devices, Microchip Technologies, Qorvo, Adobe, DRT, QTS and others
- Residential customers accounted for 37% of retail deliveries in 2023, commercial 34%, industrial 29%
- Strong industrial load growth, 7.5% CAGR from 2018-2023
- Forecast energy deliveries growth of 2% per year through 2027 driven by high-tech industrial customers and stable residential and commercial segments





# Reliability and resiliency investments

## Capital expenditures forecast<sup>(1)</sup>



Note: Dollar values in millions. Capital expenditures exclude allowance for funds used during construction. These are projections based on assumptions of future investment. Actual amounts expended will depend on various factors and may differ materially from the amounts reflected in this capital expenditure forecast

(1) Values presented do not include incremental potential investments for future RFP cycles



# Clean energy transition

Advancing toward a clean energy future

## PGE Path to 2030 Emissions Target<sup>1</sup>

**8.1** MMTCO<sub>2</sub>e

2010-2012 baseline

### Previous actions led to reduction

- Boardman Coal closure (518 MW)
- New renewables (647 MW)
- Voluntary program renewables (360 MW)
- QF Solar (278 MW)
- Rooftop solar (197 MW)
- Energy efficiency (157 MWa)
- Demand response (87 MW)
- Hydro agreements (185 MW)

**6.0** MMTCO<sub>2</sub>e

2022 actual

**25% Reduction**

### 2023 actions to support the path forward

- Renewables (311 MW)
- Battery storage (475 MW)
- Rooftop solar (53 MW)
- Energy efficiency (25 MWa)
- Demand response (97 MW)
- Hydro agreements (500 MW)

### Actions targeted for 2024-2030

- Colstrip Coal Plant exit (296 MW)
- RFPs for renewables & storage (3200 MW)
- Community-based renewable (155 MW)
- Energy efficiency (216 MWa)
- Demand response (228 MW)
- Re-class unspecified resources (~250 MW)
- Voluntary program renewables (390 MW)

### Additional goals for 2024-2030

- Rooftop solar (500-650 MW)
- Hydro agreements (250 MW)
- Standby generation (300 MW)
- Distributed storage (300 MW)

**1.6** MMTCO<sub>2</sub>e

2030 target

**80% Reduction**

2010-2012

2022

2030

<sup>1</sup> Emissions associated with power served to Oregon customers, as reported to ODEQ

## PGE has made significant progress toward decarbonization in the past decade

### Meaningful steps underway to meet 2030 emissions targets:

- Removing coal from our portfolio to meet our legislative requirement
- Advanced construction of the Clearwater Wind Development, bringing online 311 MW of non-emitting energy in January 2024, and entered into agreements for 475 MW of battery storage and 500 MW of hydro contracts
- 2,700 to 3,700 MW of additional non-emitting resources remain to be procured through multi-stage RFP processes through 2030

### Our decarbonization strategy is multi-faceted to support reliable and affordable power:

- Clean energy
- Customer-sited solutions
- Technology and innovation
- Regional solutions to resource adequacy



# Resource planning and procurement

## 2023 IRP Action Plan

### Customer Actions

- Increased energy efficiency, distributed energy resources and incorporation of customer demand response

### Community-Based Renewable Energy (CBRE) Action

- RFPs for qualifying CBRE resources, 66 MW in service by 2026, 155 MW in service by 2030

### Energy Action

- Renewable RFPs, target acquiring 261 MWa per year

### Capacity Action

- Capacity RFPs to acquire sufficient capacity to meet forecasted needs

### Transmission Actions

- Pursue options to alleviate congestion and upgrade key transmission resources

## 2023 RFP Timeline

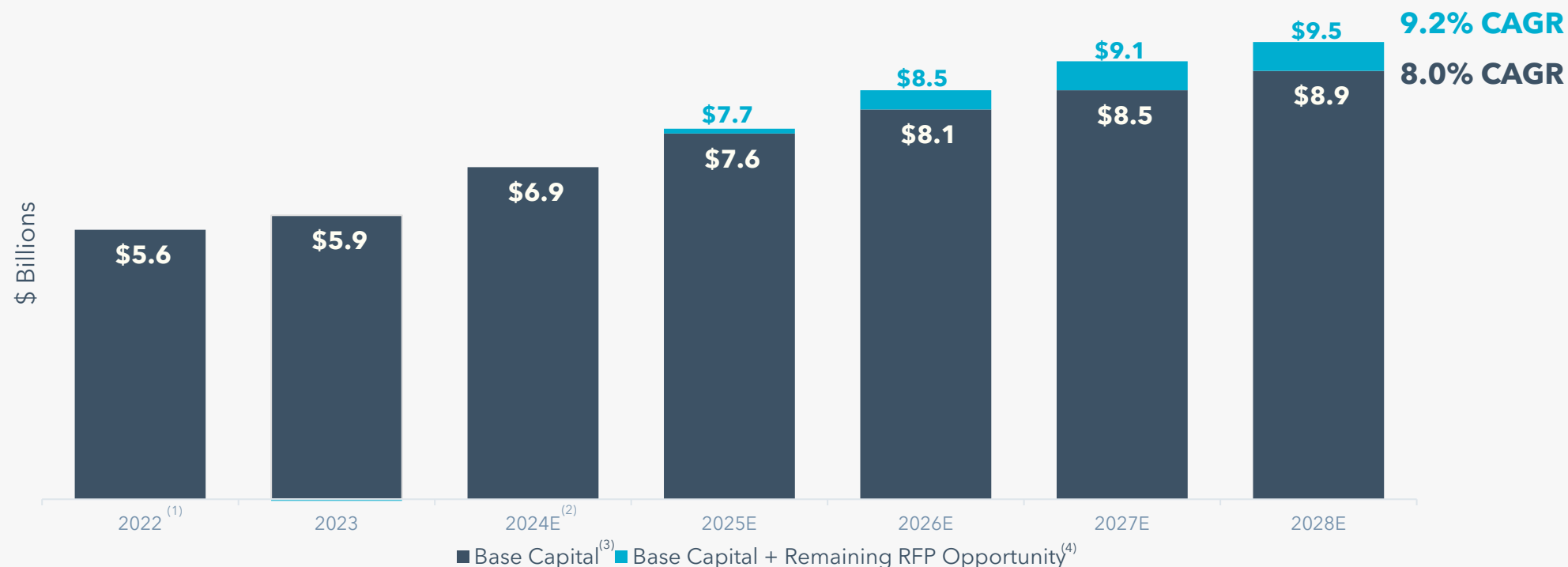
- ✓ **May 2023** Draft RFP submitted to OPUC for approval
- ✓ **February 2024** Final RFP issuance
- ☐ **Q1 2024** Bid submissions due
- ☐ **Q2 2024\*** Submit request for acknowledgement of final shortlist to OPUC and shortlist publication
- ☐ **Q3-Q4 2024\*** Execution of final contracts with winning bidders

\*Subject to change depending on the quantity and complexity of bids received and should circumstances require



# Illustrative rate base growth

- PGE's five-year base capital expenditure forecast of \$6.2 billion drives 8.0% average rate base growth, from 2022 base year
- Illustrative incremental RFP opportunities<sup>(2)</sup> potentially increase average rate base growth to 9.2%, from 2022 base year



Note: Amounts presented below are for illustrative purposes and represent potential values based on the assumptions outlined below. Amounts do not represent guidance and actual amounts may differ materially

(1) 2022 rate base value based on UE 394 2022 GRC Rate Base amount, inclusive of Colstrip

(2) 2024 beginning rate base is assumed consistent with the stipulated 2024 GRC value (\$6.2B) plus capex of \$405M for the Clearwater wind project

(3) Base scenario illustrates the potential impact of the following assumptions: a) 2024 beginning earnings power rate base is assumed consistent with the stipulated 2024 GRC value (\$6.2B) plus capex of \$405M for the Clearwater wind project; b) annual capital expenditures from 2024-2028 consistent with current capital expenditures forecast on slide 7; c) 2024 depreciation and amortization of \$500M (mid-point of 2024 earnings guidance assumption); d) multi-year closing of transmission capex to rate-base, and; e) 25-year useful life for new asset additions thereafter

(4) The base capital + incremental opportunity from RFPs illustrates the potential impact of the following assumptions: a) a total remaining IRP opportunity of 3,200 MW (mid-point of remaining resource need of 2,700 to 3,700 MW, including both energy and capacity resources); b) 25% ownership of the midpoint 3,200 MW opportunity; c) \$1,900 installed cost per KW (based on indicative values for 2021 RFP PGE-Owned Resources); d) RFP projects procured in serial cycles and with evenly spread project spend through year-end 2029 (Note: This is illustrative and actual RFP opportunity spend may be unevenly distributed); and e) 25-year useful life for RFP asset additions



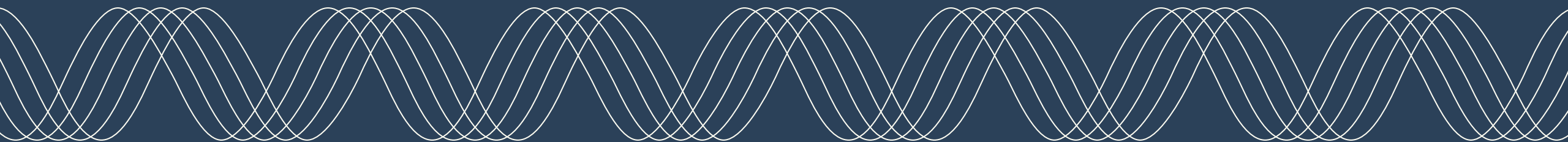
# 2025 General rate case

Rate Case Key Terms	
Rate Base	\$7.5 billion
Rate Base Increase	\$878 million, 13%
ROE	9.75%
Capital Structure	50/50
Cost of Debt	4.628%
Cost of Capital	7.189%
Revenue Requirement Increase	\$225 million, including \$37 million for power costs
Other Key Terms	<ul style="list-style-type: none"> <li>• Recovery of Constable and Seaside BESS projects</li> <li>• Redefining definition of "associated storage" within the Renewable Automatic Adjustment Clause mechanism to include standalone energy storage</li> <li>• Proposed investment recovery mechanism for reliability and resiliency assets</li> <li>• Proposed refund of monetized Investment Tax Credits to customers over 5-year period</li> </ul>

Management cannot predict the outcome of the rate case and all items are subject to OPUC approval



# Key Strengths







# Operational excellence

Continued focus on safety and a leader in reliability



**Lost Time Incident Rate**

**0.29**  
2022: 0.74



**System Average Interruption Duration Index (SAIDI)<sup>(1)</sup>**

**2<sup>nd</sup> Quartile**  
2022: 2<sup>nd</sup> Quartile



**Overall Generation Availability**

**86.5%**  
2022: 86.3%

Note: All data is as of December 31, 2023

(1) Excluding major event days. Benchmarked against the 2022 Institute of Electrical and Electronics Engineers (IEEE) Reliability survey



# Customer focus

## CUSTOMER SATISFACTION



Ranked in the **top decile** nationwide for Residential Customer Delight according to Escalent's National Energy Utility Benchmarking Study (2023)

**TOP  
5**

Ranked as a **Top 5** Utility in the United States for Customer Experience according to Forrester's The US Customer Experience Index for 3 consecutive years (2021, 2022, 2023)

## PGE PROGRAMS

**#1**

Continued position as **number 1** ranked renewable power program in the United States for 14 years according to the National Renewable Energy Laboratory (2023)<sup>(1)</sup>



Enrolled **over 69,000**<sup>(2)</sup> households in our Income Qualified Bill Discount Program, 80% program satisfaction rate of households surveyed

(1) NREL did not release rankings in 2011

(2) Amount enrolled as of the end December 31, 2023



# Clean energy and transmission investment

Building a smarter, stronger, more flexible grid to deliver the power customers need today and into the future

## Advancing the clean energy transition

### Clearwater Wind Facility

- **311** MW of emissions-free generation for PGE customers
  - PGE owns **208** MW of the project, a \$415 million investment
  - PGE entered into a PPA with a subsidiary of NextEra Energy Resources for the remaining **103** MW
- This facility is eligible for recovery under the Renewable Resource Automatic Adjustment Clause (RAAC)



## Upgrading infrastructure to enable growth

### Transmission Projects

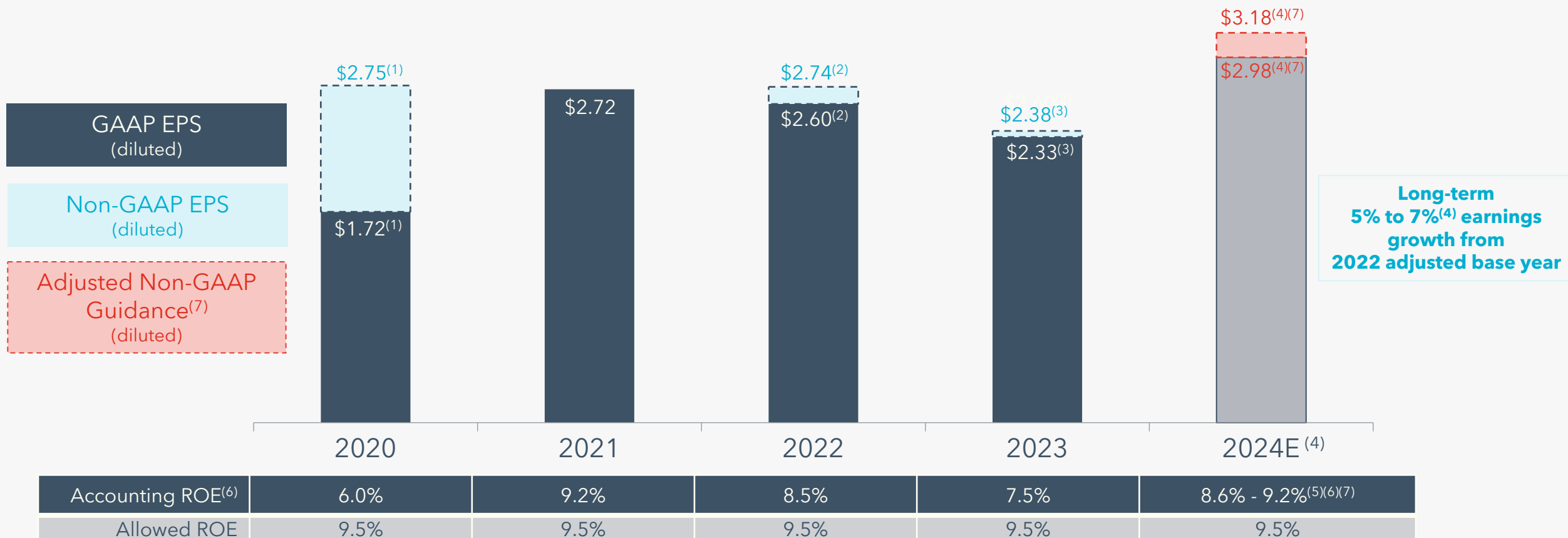
Multi-phase projects that support customers and improve reliability for the region

- **Tonquin Project**
  - 115kV transmission lines and substation upgrade
- **Hillsboro Reliability Project**
  - 230kV transmission lines and substation upgrade
- Additional substation upgrades throughout the service territory to enable load growth, led by high-tech and digital customers





# Long-term financial performance



(1) In 2020 GAAP net income was \$155 million, or \$1.72 per diluted share. After adjusting for the impacts of the Energy Trading Losses, non-GAAP net income was \$247 million, or \$2.75 per diluted share. The net effect of the energy trading losses was \$1.03 per diluted share (see appendix for important information about non-GAAP measures, guidance, and reconciliations)

(2) In 2022, GAAP net income was \$233 million, or \$2.60 per diluted share. After adjusting for the impacts of released deferrals related to 2020, non-GAAP net income was \$245 million, or \$2.74 per diluted share. The net effect of the deferral release was \$0.14 per diluted share (see appendix for important information about non-GAAP measures, guidance, and reconciliations)

(3) In 2023, GAAP net income was \$228 million, or \$2.33 per diluted share. After adjusting for the impacts of Boardman revenue requirement settlement charge, non-GAAP net income was \$233 million, or \$2.38 per diluted share. The net effect of the deferral release was \$0.05 per diluted share (see appendix for important information about non-GAAP measures, guidance, and reconciliations)

(4) Estimates and projections are based on assumptions and there can be no assurance regarding the amount of future earnings consistent with earnings guidance and earnings growth guidance

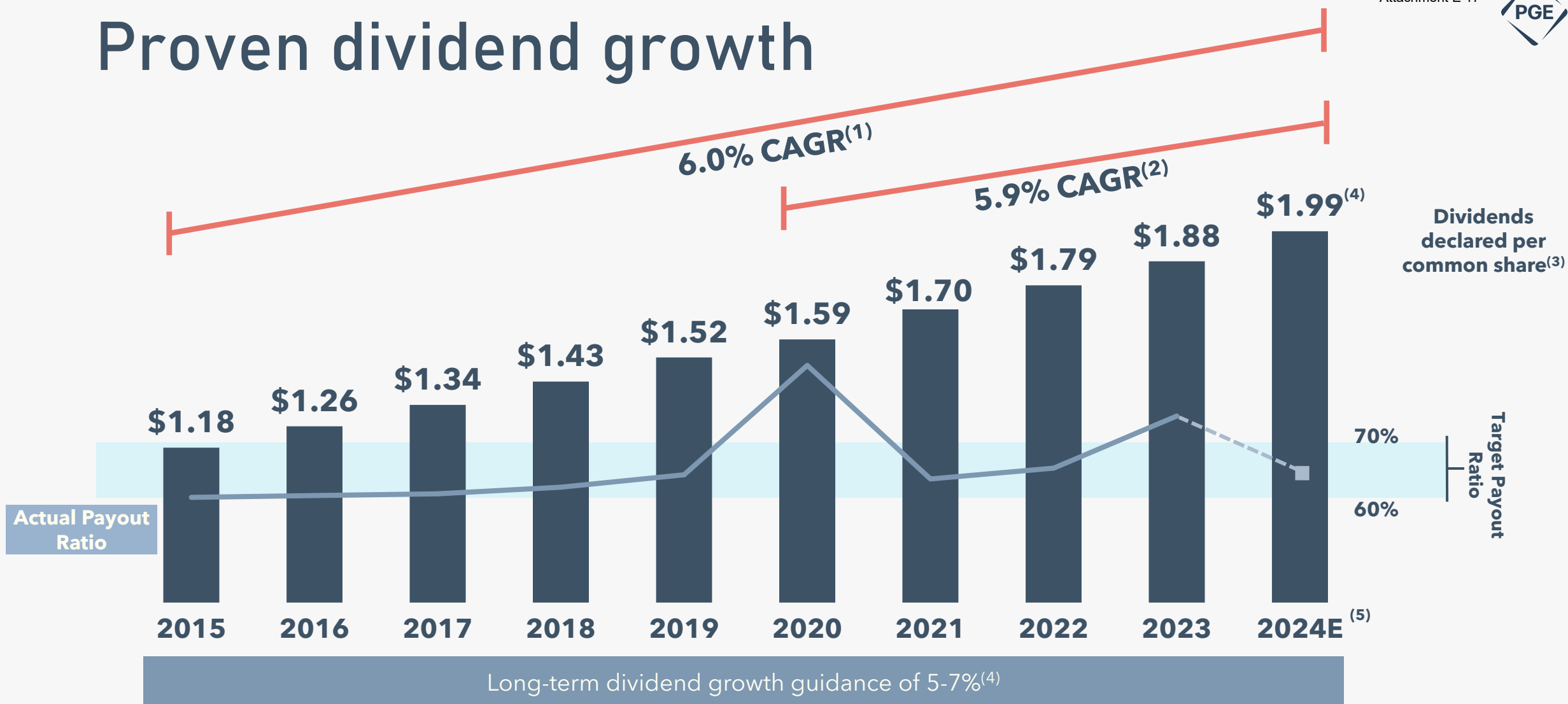
(5) 2024E Accounting ROE calculated based on adjusted earnings guidance range of \$2.98 to \$3.18 (see appendix for important information about non-GAAP measures, guidance, and reconciliations)

(6) Return on average equity

(7) See appendix for important information about non-GAAP measures, guidance, and reconciliations



# Proven dividend growth



(1) Compound Annual Growth Rate from 2015 through 2024E

(2) Compound Annual Growth Rate from 2020 through 2024E

(3) Represents annual dividends declared per common share

(4) Estimates and projections are based on assumptions and there can be no assurance regarding the amount of future dividends. The amount and timing of dividends payable and the dividend policy are the sole discretion of the Portland General Electric Board of Directors, and if declared and paid, dividend may be in amounts that are less than projected

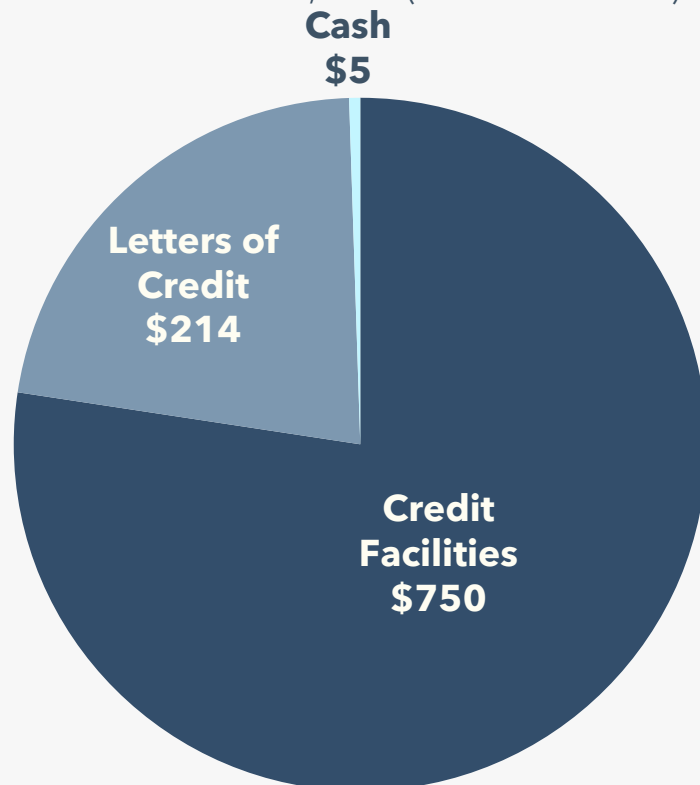
(5) 2024E estimated dividends declared are calculated using the mid-point of PGE's long-term dividend growth guidance of 5-7% and 2024E dividend payout ratio is calculated using the midpoint of adjusted earnings guidance of \$2.98 to \$3.18



# Liquidity and financing

## Total Liquidity: \$969 million

as of December 31, 2023 (dollars in millions)



Ratings	S&P	Moody's
Senior Secured	A	A1
Senior Unsecured	BBB+	A3
Commercial Paper	A-2	P-2
Outlook	Stable	Stable

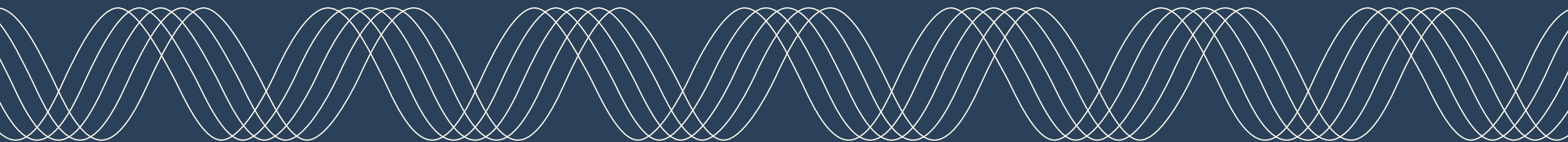
Expected 2024 debt financings (dollars in millions)	Q1	Q2	Q3	Q4
Long-term debt	\$450		\$140	\$140

Equity financings (dollars in millions)	Total facility	Settled to-date
At-The-Market Offering Program <sup>(1)</sup>	\$300	-

(1) PGE entered into an at-the-market offering program in the second quarter of 2023. As of December 31, 2023, pursuant to the terms of the equity distribution agreement, PGE entered into separate forward sale agreements with forward counterparties and under such agreements, the Company could have physically settled by delivering 1,714,971 shares to the counterparty in exchange for cash of \$78 million. Any proceeds from the issuances of common stock will be used for general corporate purposes and investments in renewables and non-emitting dispatchable capacity



# Environmental, Social and Governance





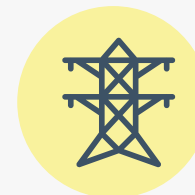
# Environmental, social, & governance highlights







Decarbonize



Electrify



Perform

 <p><b>GHG Emissions Targets</b></p>	<p>In 2023, PGE's total system load was comprised of 35% specified, non-emitting energy sources. PGE continued to make steady progress, reducing emissions from unspecified sources<sup>1)</sup>, procuring clean energy resources and investing in the tools that will support driving emissions toward target levels in future years</p>
 <p><b>Clean Energy Investment</b></p>	<p>Completed construction of the new Clearwater 311 MW wind energy facility in January 2024 and procured 475 MW of battery energy storage systems to begin serving customers in 2024 and 2025</p>
 <p><b>Green Financing Framework</b></p>	<p>Executed an additional \$500 million in green bonds in 2023 to continue supporting clean energy investments under our Green Financing Framework</p>
 <p><b>Diversity, Equity and Inclusion</b></p>	<p>Amidst tight labor market conditions, PGE continued to attract and retain a diverse workforce, with women accounting for over 35% and Black, Indigenous and People of Color (BIPOC) employees more than a fourth, of the leadership at PGE</p>

Our [2023 Environmental, Social & Governance Report](#) highlights key initiatives and achievements that support PGE's **commitment to decarbonization and advancing well-being for customers, employees, communities and the environment**

1) Unspecified sources consist of purchased power for which a specific generating resource is not defined, and could be any of the generation types (e.g., wind, hydro, gas)

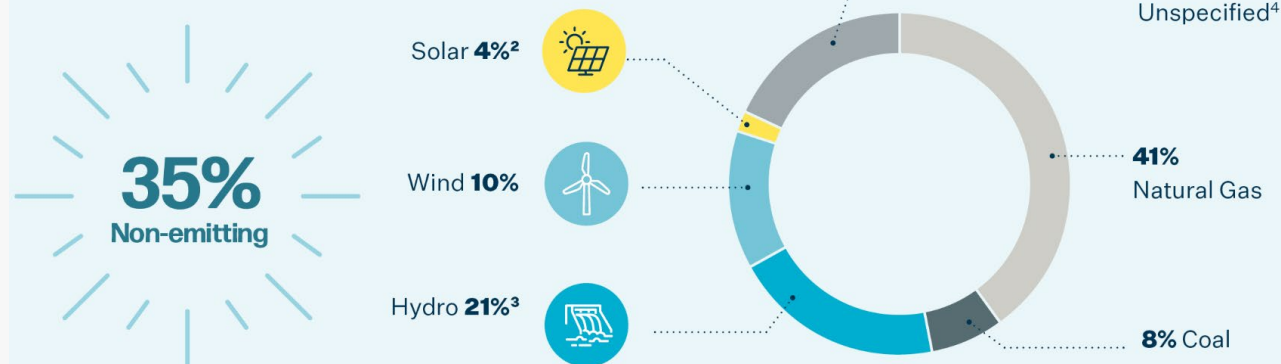




# Clean energy commitment

PGE's clean energy and emissions goals have always been rooted in our customers' preferences, who are some of the most sophisticated renewable energy buyers in the world

## Resource mix for PGE's total system load<sup>1</sup> Retail and wholesale



### Scope 1

**6.84** million metric tons of CO<sub>2</sub>e

**Scope 1 emissions** includes all of PGE's direct emissions, made up of fuel burned by thermal generating resources, fuel burned by PGE's vehicle fleet and natural gas used at PGE's office facilities.

### Scope 2

**0.04** million metric tons of CO<sub>2</sub>e

**Scope 2 emissions** are emissions related to Transmission and Distribution line loss and emissions associated with power purchased from a third party that is consumed by PGE.

### Scope 3

**2.29** million metric tons of CO<sub>2</sub>e

**Scope 3 emissions** include the generation of purchased electricity then sold to end users. Reporting and data collection capabilities are still being developed for other Scope 3 sources of emissions.

## PGE's goals go above and beyond required emission reduction targets and PGE was the first utility in the U.S. to sign The Climate Pledge

- Commitment to reach net-zero carbon emissions by 2040, which will require reducing Scope 1, 2 and 3 emissions

**THE CLIMATE PLEDGE**

## PGE has made significant progress towards decarbonization in the past decade, with meaningful steps in place to meet future goals

- By 2030, PGE will no longer generate electricity with coal to serve Oregon customers
- 2,700 to 3,700 MW of additional non-emitting resources to be procured through 2030
- Commitments to reduce environmental impacts from other areas of the business, including goals set to electrify PGE's vehicle fleet

1. Percentages above represent 2023 resource mix from PGE's total system load, inclusive of wholesale volumes.

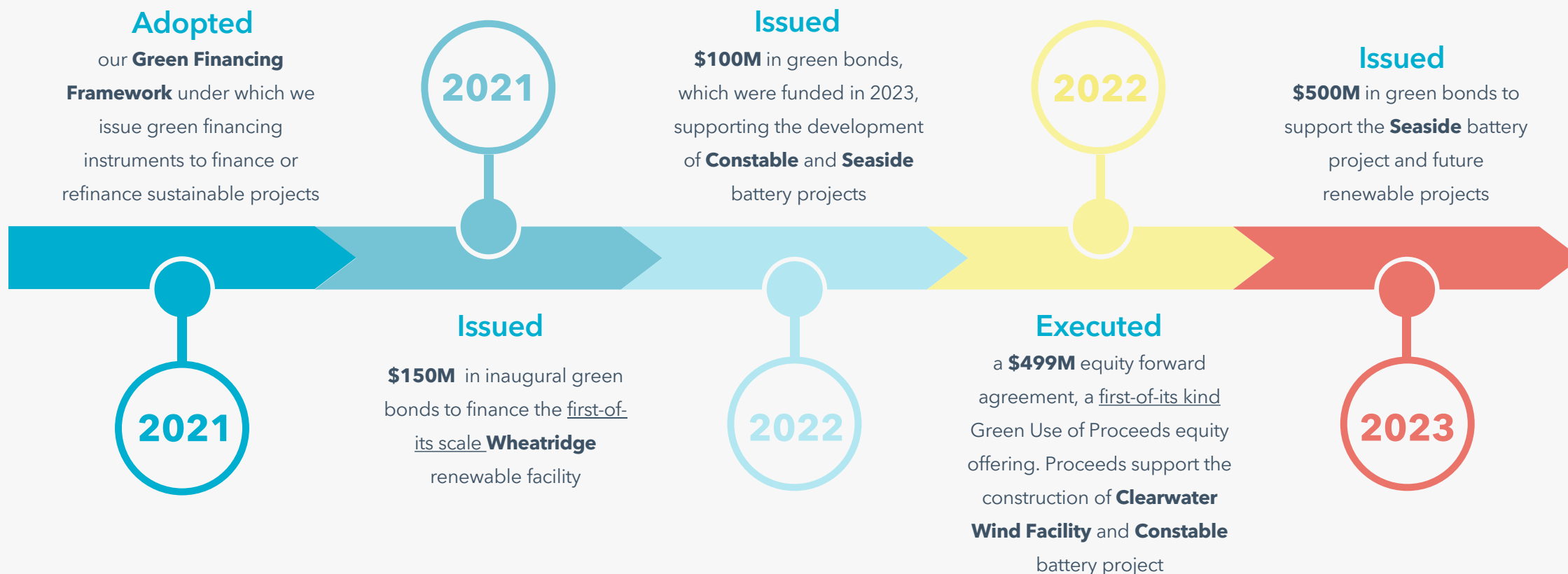
2. Represents utility-scale solar, does not include customer rooftop solar resources.

3. Hydro amounts include purchases from Bonneville Power Administration, which may have an immaterial amount of emissions associated with them, per ODEQ rules.

4. Unspecified is purchased power for which a specific generating resource is not defined and could be any of the generation types (e.g., wind, hydro, gas).



# Green financing framework





# Community and employee engagement



**\$197M** spent with diverse suppliers in 2023, 18% of total spend for 2023



**20,000+** volunteer hours completed by employees and retirees



**67%** employee participation in charitable giving and/or volunteering



**\$4.6M** in total charitable giving



Established **Community Benefits and Impact Advisory Group**, working to develop more equitable strategies for the clean energy future



Developed a **Strategic Tribal Engagement Plan (STEP)**, enhancing engagement with the 7 area Tribes that PGE works with

**27%** Black, Indigenous and People of Color make up over **one-fourth** of leadership

**35%** Women make up over **one-third** of leadership, including our CEO



Multiple **leadership development programs** offered to employees to cultivate high performing and diverse leaders



100% rating as a Best Place to Work for LGBTQ Equality for **10 years** in a row



**Recognized globally** in the 2023 Bloomberg Gender Equality Index



# Diverse and experienced Board

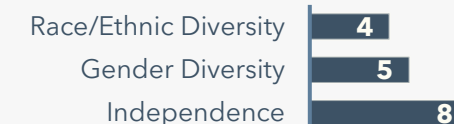
Track record of thoughtful refreshment enables us to have a Board with the experience and diverse perspectives needed to oversee our business

## Diverse and Independent Leadership

Board Tenure












Board Diversity



Board Skills



Name	Age	Director Since	Industry/Experience	Diversity	Committee Membership <sup>(1)</sup>	Other Public Boards
 <b>Dawn Farrell</b> Independent	64	2022	Utilities/Energy	White/Woman	<ul style="list-style-type: none"> <li>Finance</li> <li>Governance</li> </ul>	1
 <b>Marie Oh Huber</b> Independent	62	2019	Law/Technology/Customer Experience	Asian/Woman	<ul style="list-style-type: none"> <li>Compensation</li> <li>Governance</li> </ul>	0
 <b>Kathryn Jackson</b> Independent	66	2014	Technology/Environmental	White/Woman	<ul style="list-style-type: none"> <li>Audit and Risk, Chair</li> <li>Governance</li> </ul>	2
 <b>Michael Lewis</b> Independent	61	2021	Utilities	African American/Man	<ul style="list-style-type: none"> <li>Compensation</li> <li>Finance, Chair</li> </ul>	2
 <b>Michael Millegan</b> Independent	65	2019	Communications/Technology	African American/Man	<ul style="list-style-type: none"> <li>Audit and Risk</li> <li>Finance</li> </ul>	1
 <b>John O'Leary</b> Independent	63	2024	Automotive/Clean Transportation	White/Man	<ul style="list-style-type: none"> <li>Audit and Risk</li> <li>Finance</li> </ul>	1
 <b>Patricia Pineda</b> Independent	72	2022	Human Resources/Consumer Products	Latina/Woman	<ul style="list-style-type: none"> <li>Compensation, Chair</li> <li>Finance</li> </ul>	2
 <b>Maria Pope</b> President and CEO	59	2018	Utilities/Finance	White/Woman		1
 <b>James Torgerson</b> Independent Chair	71	2021	Energy/Finance	White/Man	<ul style="list-style-type: none"> <li>Audit and Risk</li> <li>Governance</li> </ul>	0

(1) Key to Abbreviated Committee Names: Compensation- Compensation, Culture and Talent Committee, Governance- Nominating, Governance and Sustainability Committee  
 Note: Information as presented in the 2024 Proxy statement, filed on March 6, 2024

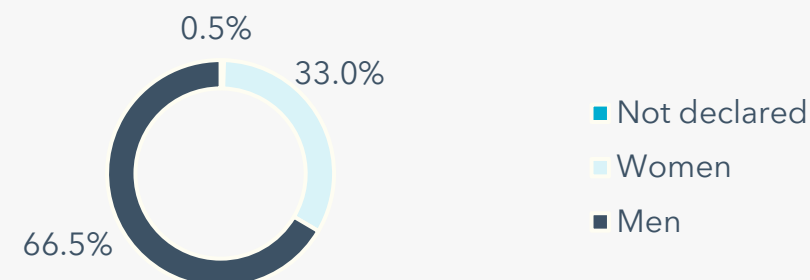


# Diversity, equity, and inclusion

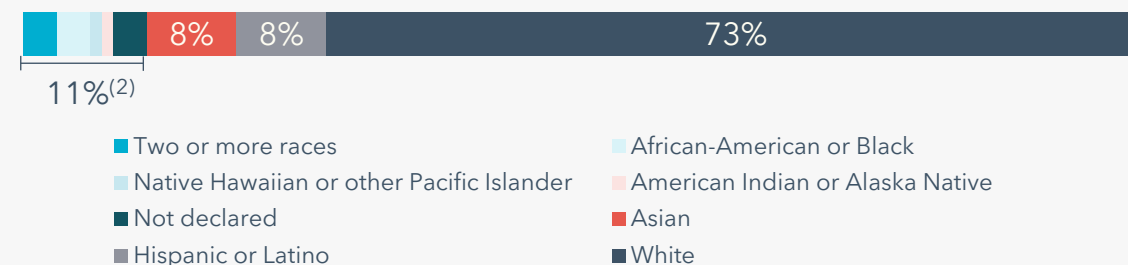
## Committed to DEI across our business

- **Partners and suppliers:** Increased our supplier diversity to 18% of total supplier spending in 2023, up from 14% in 2022
- **Awareness, education, and training:** Racial equity education for our board, leadership and employees
- **Recruitment and development:** Development opportunities for underrepresented, high-potential employees interested in leadership
- **Awards and recognition:** Perfect score on the Human Rights Corporate Equality Index for 10 years in a row and inclusion in the Gender-Equality Index for 5 years in a row
- **Competitive pay and benefits:** Diversity metrics included in incentive programs. PGE employees in the same role, with comparable work experience, at the same location earn a near-perfect dollar-for-dollar pay
- **Policies and purpose:** Human Rights Policy Statement established, promoting our commitment to our employees, communities, suppliers and partners

**Workforce by Gender<sup>(1)</sup>**



**Workforce Racial/Ethnic Diversity<sup>(1)</sup>**

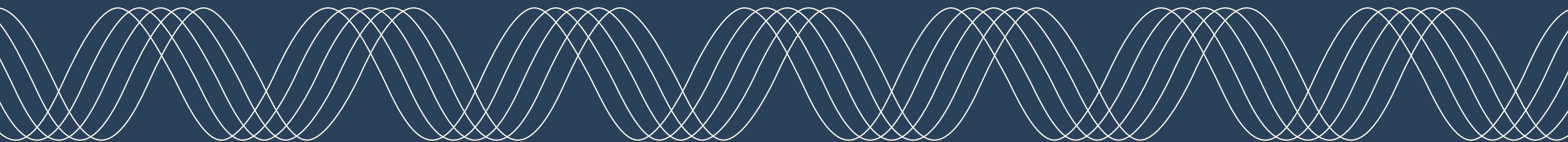


(1) As of December 31, 2023

(2) Two or more races, 3%; African-American or Black, 3%; Native Hawaiian or other Pacific Islander, 1%; American Indian or Alaska Native, 1%; No answer, 3%



# Appendix





# Wildfire regulatory framework



## WMP

Annually, PGE files a Wildfire Mitigation Plan with the OPUC which summarizes our approach to addressing wildfire risk. The 2024 [Wildfire Mitigation Plan](#) (Docket UM 2208) was submitted in December 2023

## AAC

PGE's Wildfire Automatic Adjustment Clause (AAC) enables timely recovery of wildfire mitigation costs, including O&M and capital expenditures

## PGE works closely with key stakeholders to plan and coordinate on wildfire prevention and response, including

- Peer utilities
- State, Tribal and local fire agencies
- Fire management officers
- District foresters
- Oregon Department of Forestry
- Oregon Joint Use Association
- Private landowners
- Electric Power Research Institute
- Western Energy Institute
- Edison Electric Institute
- US DOE
- Federal fire agencies
- International Wildfire Risk Mitigation Consortium



PANO AI cameras detect fires and notify PGE and local agencies instantaneously



# PGE's wildfire risk mitigation hierarchy

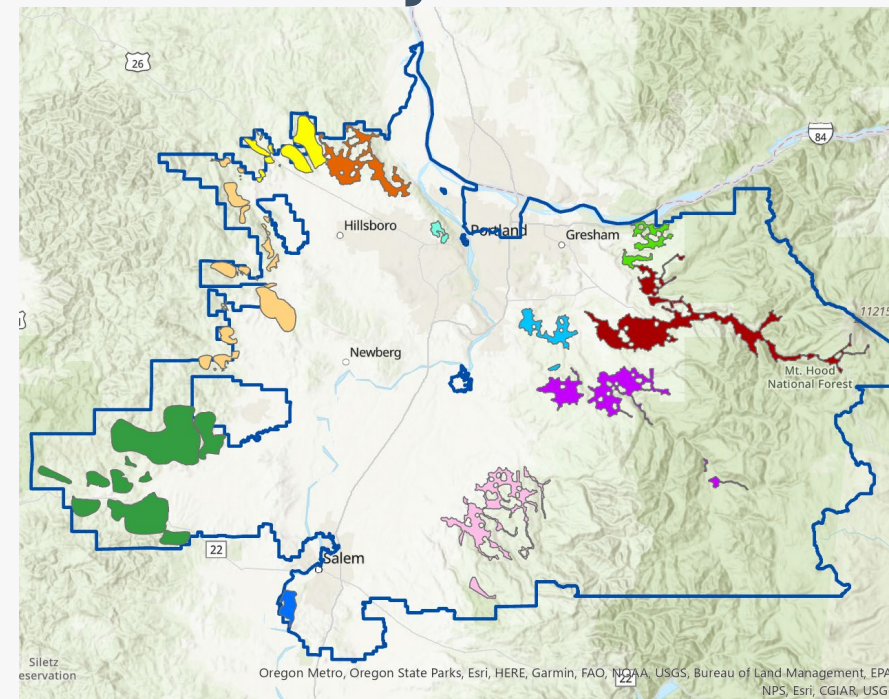


### Public Safety Power Shutoff

**2** In response to extreme conditions, PGE has successfully implemented two Public Safety Power Shutoffs (PSPS), one in 2020 and one in 2022 to protect lives, property and public spaces

### Operational Practices

- 11** Defined high risk fire zones (HFRZs) within PGE's service territory
- 2.4%** Percent of PGE customers within HFRZs
- 9%** Percent of PGE service territory identified as HFRZ
- 4%** Percent of PGE's overhead system located within a HFRZ
- 78** Reclosers throughout HFRZs, enabling operational readiness and protection during fire season



High Fire Risk Zones (brightly shaded) within PGE's service territory (outlined)

### System Hardening And Situational Awareness

- \$91M** Forecasted 2024 Wildfire Mitigation spend<sup>1</sup>
- 50%** Percent of distribution lines that are undergrounded in PGE's service territory
- 100%** HFRZ camera detection and weather station coverage

1) Per PGE's 2024 Wildfire Mitigation Plan. Amount calculated using the midpoint of the \$43 - \$49.2 forecasted capital costs





# Public safety power shutoff (PSPS)

Temporarily turning off power during extreme weather conditions to reduce wildfire risk

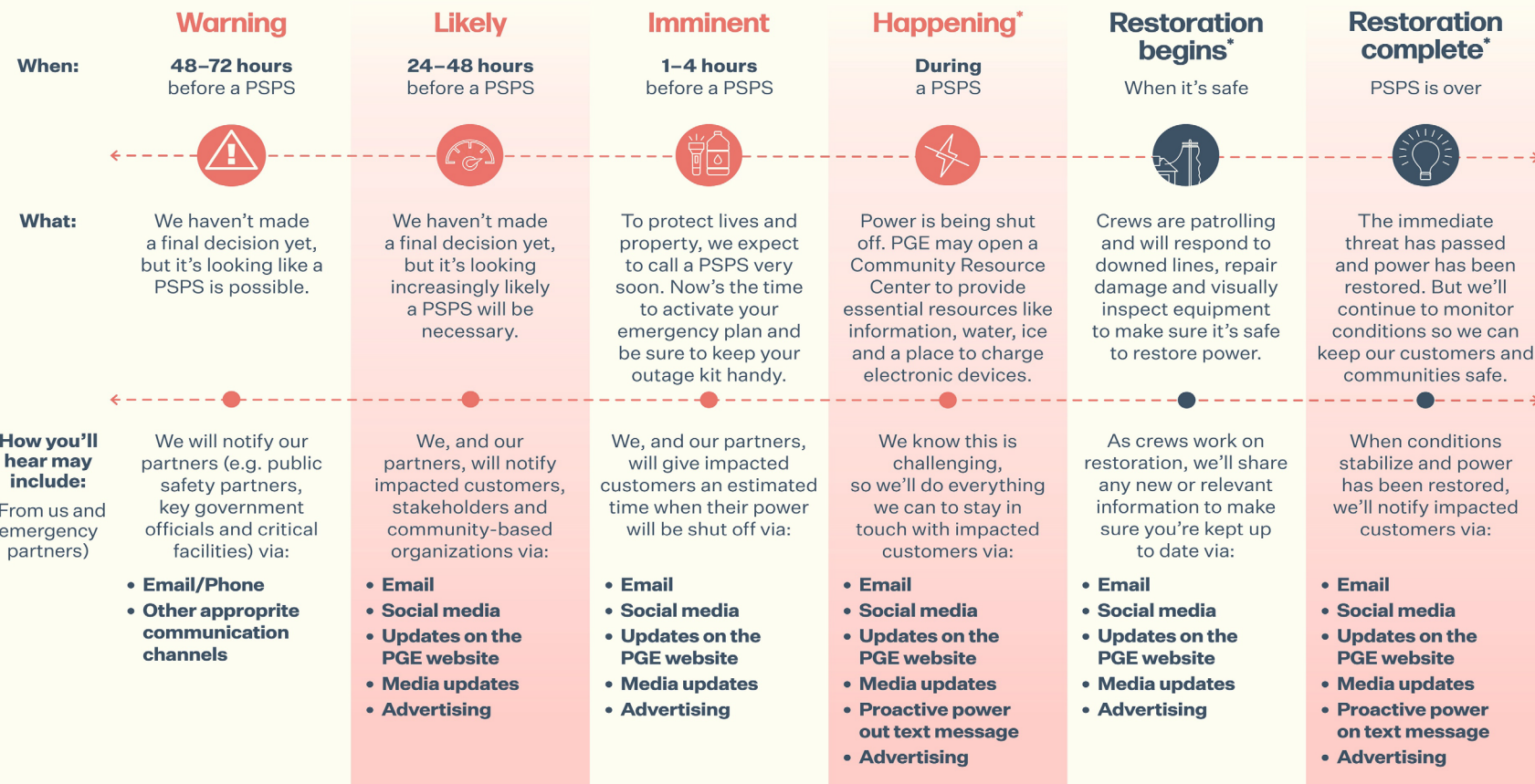


## Factors we consider before calling a Public Safety Power Shutoff (PSPS)

These may include but aren't limited to:

	High winds		Real-time observations from the field
	Dry vegetation		Red Flag Warning
	Temperature		Collaboration with local, state and regional agencies
	Low humidity levels		

## PSPS notifications to partners, customers and other stakeholders



\*PGE will provide status updates at least every 24 hours



# Constructive regulatory / policy environment

Oregon	Federal
<ul style="list-style-type: none"> <li>• Oregon legislation requires 100% clean energy by 2040</li> <li>• Oregon Public Utility Commission               <ul style="list-style-type: none"> <li>• Governor-appointed 3-member commission with staggered 4-year terms</li> <li>• Commission has consistently approved investments in renewables, going back to Biglow Canyon Wind Farm, which went online 15 years ago</li> </ul> </li> <li>• Regulatory dynamics support PGE and the transition to clean energy               <ul style="list-style-type: none"> <li>• Renewable Portfolio standard (adopted in 2007; increased in 2016)</li> <li>• Renewable Adjustment Clause</li> <li>• Forward test years</li> <li>• Integrated resource planning framework</li> <li>• Accelerated depreciation of Colstrip to 2025</li> <li>• History of reasonable settlements in rate cases</li> <li>• Regulatory support for recovery of storm response and wildfire mitigation costs</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The Inflation Reduction Act (IRA), which was signed into law in August 2022, is expected to further enhance PGE's already strong prospects for renewables-based growth</li> <li>• Better positions renewables to be owned and operated by regulated utilities like PGE and makes renewables more affordable for PGE customers               <ul style="list-style-type: none"> <li>• Allows for solar projects to elect ITC or PTC</li> <li>• Allows for the transfer of tax credits after 2022</li> <li>• Standalone storage can earn tax credits</li> </ul> </li> <li>• Makes tax credits available for renewable energy through the later of 2032 or when annual greenhouse gas emission in the U.S. electric sector falls 75% from 2022 levels               <ul style="list-style-type: none"> <li>• Effectively increases the competitiveness of renewables relative to conventional generation, bolstering long-term deployment</li> <li>• Improves the economics for repowering existing renewables as they age</li> </ul> </li> </ul>

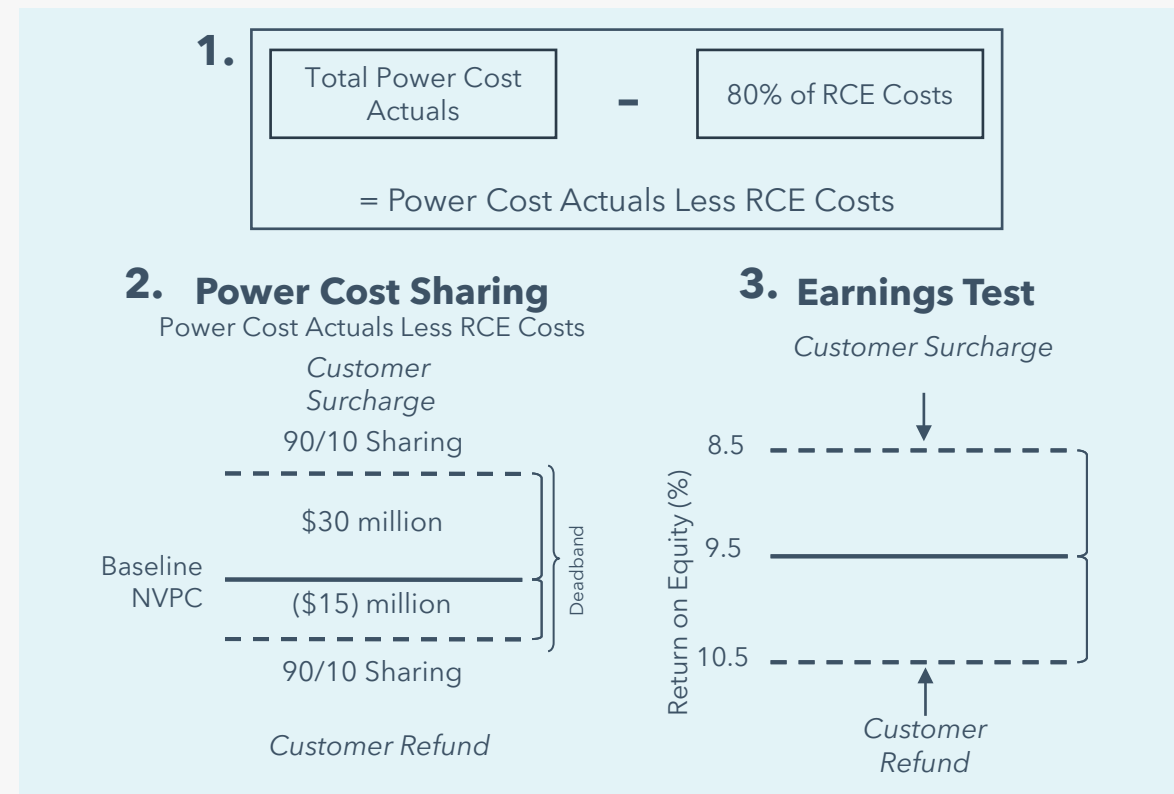
**PGE's regulatory environment in Oregon, along with the recently-signed IRA, position the company to play an important role in the decarbonization of Oregon**



# Recovery of power costs

## Annual power cost update tariff

- Annual reset of prices based on forecast of net variable power costs (NVPC) for the coming year
- Subject to OPUC prudence review and approval, new prices go into effect on or around January 1 of the following year



- PGE can recover 80% of power costs prudently incurred during Reliability Contingency Events (RCEs) subject to the following criteria:
  - Day-Ahead Mid-C index prices exceed \$150/MWh
  - PGE is eligible to request or acquire RA assistance through a regional RA program in which it participates
  - A neighboring Balancing Authority has publicly declared an event that indicates potential supply or actual supply constraints
- From 2020 to 2022, PGE experienced 15 events lasting a combined 40 days that would have qualified as RCEs under the approved provision. If the RCE provision had been in place at that time, the average annual deferral for costs incurred during these events would have been \$7.3M per year<sup>(1)</sup> (80% of average annual costs)
- PGE absorbs power costs/benefits, excluding the 80% RCE Cost recovery, within the deadband range. Amounts outside the deadband are shared 90% with customers and 10% with PGE, subject to an earnings test applied using the regulated ROE as a threshold
- Customer surcharge occurs if PGE’s actual regulated ROE is below 8.5% (ROE will not exceed 8.5% with surcharge); Customer refund occurs if PGE’s actual regulated return is above 10.5% (regulated return will not decrease below 10.5% with refund)

Detriment / (Benefit) PCAM Baseline at Year End <sup>(2)</sup> :										
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
<b>Over / (Under)</b>	(\$7)	(\$3)	(\$10)	\$15	(\$3)	\$5	\$ (13)	\$30 <sup>(3)</sup>	\$23	\$5

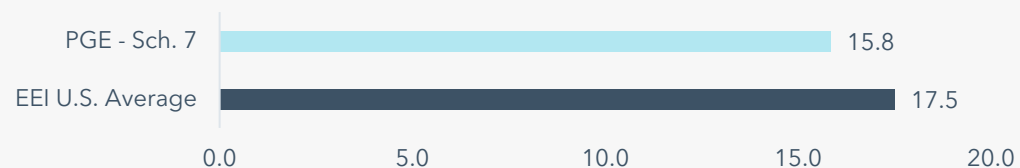
(1) Costs estimated based on framework approved within the 2024 GRC (UE 416). Future RCE costs could vary significantly based on market pricing, duration or other event specific factors  
 (2) Dollar values in millions  
 (3) Represents variance to baseline net of 90% of the excess variance to be collected from customers



# Average retail price comparison

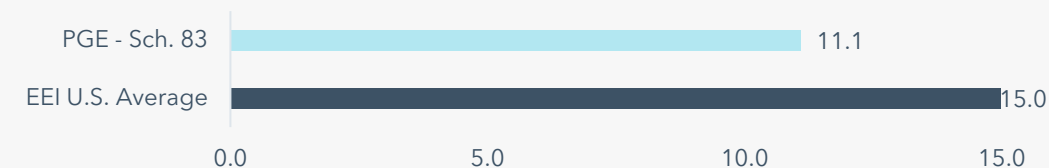
## Residential Electric Service Prices:

1,000 kWh monthly consumption  
(Prices in cents per kWh)



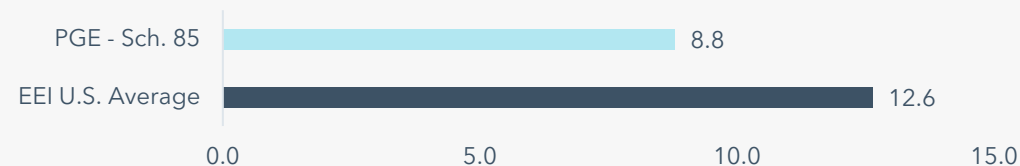
## Commercial Electric Service Prices:

40 kW demand and 14,000 kWh monthly consumption  
(Prices in cents per kWh)



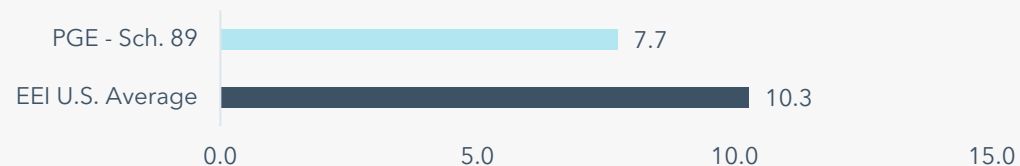
## Industrial Electric Service Prices

1,000 kW peak demand and 400,000 kWh monthly consumption  
(Prices in cents per kWh)



## Large Industrial Electric Service Prices

50,000 kW peak demand and 32,500,000 kWh monthly consumption  
(Prices in cents per kWh)



Note: EEI U.S. Average is based on Investor-owned utilities only

Source: EEI Typical Bills and Average Rates Report for Prices in effect July 1, 2023



# 2024 Earnings Sensitivities

	<b>Sensitivity</b>	<b>Full-Year Adjusted EPS Impact</b>
Load Growth - Residential <sup>(1)</sup>	± 1%	± \$0.07
Load Growth - Commercial <sup>(1)</sup>	± 1%	± \$0.02
Load Growth - Industrial <sup>(1)</sup>	± 1%	± \$0.01
O&M Expense	± \$10 million	± \$0.07
Interest Rates <sup>(2)</sup>	± 25 bps	± \$0.01
Effective Tax Rate	± 1%	± \$0.03

(1) Assumes incremental load is charged at average retail rate per customer class and served at average Annual Update Tariff (AUT) power cost rate

(2) Assumes interest rate impact for full year on outstanding debt issuances and expected debt financings in 2024



# Non-GAAP financial measures

This press release contains certain non-GAAP measures, such as adjusted earnings, adjusted EPS and adjusted earnings guidance. These non-GAAP financial measures exclude significant items that are generally not related to our ongoing business activities, are infrequent in nature, or both. PGE believes that excluding the effects of these items provides a meaningful representation of the Company's comparative earnings per share and enables investors to evaluate the Company's ongoing operating financial performance. Management utilizes non-GAAP measures to assess the Company's current and forecasted performance, and for communications with shareholders, analysts and investors. Non-GAAP financial measures are supplementary information that should be considered in addition to, but not as a substitute for, the information prepared in accordance with GAAP.

Items in the periods presented, which PGE believes impact the comparability of comparative earnings and do not represent ongoing operating financial performance, include the following:

- 2020: Certain energy trading losses
- 2022: Non-cash Wildfire and COVID deferral reversal charge associated with the year ended 2020, resulting from the OPUC's 2022 GRC Final Order earnings test
- 2023: Boardman revenue requirement settlement charge associated with the year ended 2020, resulting from the OPUC's 2022 GRC Final Order

Items impacting 2024 earnings guidance, which PGE believes impact the comparability of comparative earnings and do not represent ongoing operating financial performance, include the following:

- Non-deferrable storm restoration costs and non-deferrable Reliability Contingency Event (RCE) costs resulting from the January 2024 winter storm

Due to the forward-looking nature of PGE's non-GAAP adjusted earnings guidance, and the inherently unpredictable nature of items and events which could lead to the recognition of non-GAAP adjustments (such as, but not limited to, regulatory disallowances or extreme weather events), management is unable to estimate the occurrence or value of specific items requiring adjustment for future periods, which could potentially impact the Company's GAAP earnings. Therefore, management cannot provide a reconciliation of non-GAAP adjusted earnings per share guidance to the most comparable GAAP financial measure without unreasonable effort. For the same reasons, management is unable to address the probable significance of unavailable information.

PGE's reconciliation of non-GAAP earnings for the years ended December 31, 2020, December 31, 2022, and December 31, 2023 are on the following slide.



# Non-GAAP financial measures

<b>Non-GAAP Earnings Reconciliation for the year ended December 31, 2020</b>		
<b>(Dollars in millions, except EPS)</b>	<b>Net Income</b>	<b>Diluted EPS</b>
<b>GAAP as reported for the year ended December 31, 2020</b>	\$155	\$1.72
Exclusion of certain trading losses	127	1.42
Tax effect <sup>(1)</sup>	(35)	(0.39)
<b>Non-GAAP as reported for the year ended December 31, 2020</b>	<b>\$247</b>	<b>\$2.75</b>

<b>Non-GAAP Earnings Reconciliation for the year ended December 31, 2022</b>		
<b>(Dollars in millions, except EPS)</b>	<b>Net Income</b>	<b>Diluted EPS</b>
<b>GAAP as reported for the year ended December 31, 2022</b>	\$233	\$2.60
Exclusion of 2020 Wildfire and COVID deferral reversal	17	0.19
Tax effect <sup>(1)</sup>	(5)	(0.05)
<b>Non-GAAP as reported for the year ended December 31, 2022</b>	<b>\$245</b>	<b>\$2.74</b>

<b>Non-GAAP Earnings Reconciliation for the year ended December 31, 2023</b>		
<b>(Dollars in millions, except EPS)</b>	<b>Net Income</b>	<b>Diluted EPS</b>
<b>GAAP as reported for the year ended December 31, 2023</b>	\$228	\$2.33
Exclusion of Boardman revenue requirement settlement charge	7	0.07
Tax effect <sup>(1)</sup>	(2)	(0.02)
<b>Non-GAAP as reported for the year ended December 31, 2023</b>	<b>\$233</b>	<b>\$2.38</b>

(1) Tax effects were determined based on the Company's full-year blended federal and state statutory tax rate

## **Attachment F**



**PGE's 2023 rate increase filing request compared to PGE's 2024 request**

Issue	PGE's UE 416 Request	Stipulation in UE 416	UE 416 Order	PGE's UE 435 Request
<b>Previously litigated issues</b>				
<b>T&amp;D for reliability and resilience<sup>1</sup></b>				
Distribution Automation	Yes <sup>ii</sup>	T&D and O&M issues settled in Second Partial Stipulation which was adopted by the Commission <sup>1</sup>		Yes <sup>iii</sup>
Field Area Network	Yes <sup>iv</sup>			Yes <sup>v</sup>
Advanced Distribution Management System	Yes <sup>vi</sup>			Yes <sup>vii</sup>
Virtual Power Plant	Yes <sup>viii</sup>			Yes <sup>ix</sup>
Routine Vegetation Management (RVM)	Yes <sup>x</sup>	Yes <sup>xi</sup>	Adopted stipulation <sup>xii</sup>	Yes <sup>xiii</sup>
<b>Policy Drivers</b>				
PGE's Power Cost Adjustment Mechanism (PCAM)	Yes <sup>xiv</sup>	Yes <sup>xv</sup>	Adopted stipulation <sup>xvi</sup>	Yes <sup>xvii</sup>
Standalone battery storage projects included in Renewable Automatic Adjustment Clause (RAAC)	Yes <sup>xviii</sup>	Withdrawn <sup>xix</sup>	No	Yes <sup>xx</sup>
Investment Recovery Mechanism (IRM) <sup>xxi</sup>	x	No	No	Allow for recovery outside of a general rate case; want to work with parties to establish multi-year rate case process <sup>xxii</sup>
<b>Revenue Requirement</b>	Increase revenue requirement by \$338m; 4% increase; 9.5% base rate increase & 4.5% fuel and power costs	Yes <sup>xxiii</sup>	Adopted stipulation <sup>xxiv</sup>	increase to revenue requirement for base rates by \$202.0 million and prices by 7.3% on average on January 1, 2025, excluding forecasted net variable power costs <sup>xxv</sup>

<sup>1</sup> UE 416 – Second Partial Stipulation.

Issue	PGE's UE 416 Request	Stipulation in UE 416	UE 416 Order	PGE's UE 435 Request
Cost of Capital	7.06% percent, which is comprised of a capital structure of 50% equity and 50% long-term debt <sup>xxvi</sup>	ROE remain at 9.5% <sup>xxvii</sup>	Adopted stipulation <sup>xxviii</sup>	7.19% with 50% equity and 50% long-term debt <sup>xxix</sup>
Return on Equity (ROE)	Requested ROE from 9.5% to 9.8%. <sup>xxx</sup>	ROE remain at 9.5% <sup>xxxi</sup>	Adopted stipulation <sup>xxxii</sup>	Return on Equity (ROE) increase request: <sup>xxxiii</sup> from 9.5% to 9.75% <sup>xxxiv</sup>
Increase basic residential customer charge	Single-family: from \$11 to \$13/month; Multi-family: from \$8 to \$10/month <sup>xxxv</sup>	Yes	Yes <sup>xxxvi</sup>	Single-family and multi-family increase by \$2.00 <sup>xxxvii</sup>  Single family from \$13 to \$15/month; Multi-family from \$10 to \$12/month <sup>xxxviii</sup>
Employee compensation	bargaining and non-bargaining employees <sup>xxxix</sup>	Yes <sup>xl</sup>	Yes <sup>xli</sup>	bargaining and non-bargaining employees <sup>xlii</sup>
<b>New Issues</b>				
Battery storage cost tracking mechanism	No	No	No	<u>2025 Batteries</u> : <i>Constable battery</i> : \$17.3m revenue requirement; <i>Seaside battery</i> : revenue requirement \$49.5 million and rate base of \$369.7 million <sup>xliii</sup>
Battery storage investment tax credits	No	No	No	Expect \$51.5m to customers: amortize over five years starting in 2025 <sup>xliv</sup>
Investment Recovery Mechanism (IRM) <sup>xlv</sup>	No	No	No	Allow for recovery outside of a general rate case; want to work with parties to establish multi-year rate case process <sup>xlvi</sup>

<sup>i</sup> UE 416 – Exec. Summary at 3; *see* UE 416 – Exec. Summary at 2; UE 435 – PGE/100, Pope-Sims/5-6 & PGE/400, Bekkedahl-Felton/2 ( PGE states it is expecting a variance of \$23.3m from 2024 budget to 2025 forecast).

<sup>ii</sup> UE 416 – Exec. Summary at 2.

<sup>iii</sup> UE 435 – PGE/400, Bekkedahl-Felton/3 (“...the list of projects can be found in PGE Exhibit 401.”).

<sup>iv</sup> UE 416 – Exec. Summary at 2.

<sup>v</sup> UE 435 – PGE/400, Bekkedahl-Felton/3 (“...the list of projects can be found in PGE Exhibit 401.”).

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- vi UE 416 – Exec. Summary at 2.
- vii UE 435 – PGE/400, Bekkedahl-Felton/3 (“...the list of projects can be found in PGE Exhibit 401.”).
- viii UE 416 – Exec. Summary at 2.
- ix UE 435 – PGE/400, Bekkedahl-Felton/13 (PGE is requesting a \$4m incremental cost increase for “VPP initial startup costs including the hiring of new staff, program development costs including IT resources, and training and development expenditures.”).
- x UE 416 – Exec. Summary at 9.
- xi UE 416 – Sixth Partial Stipulation at 4.
- xii UE 416 – OPUC Order 23-386.
- xiii UE 435 – PGE/400, Bekkedahl-Felton/8-9 (recover \$4.8m forecast increase from 2024 budget).
- xiv UE 416 – Exec. Summary at 5; *see* UE 416 – CUB/200, Jenks/7-32 (PGE is proposing to shift the business risk associated with power cost forecasting to customers.).
- xv UE 416 – Sixth Partial Stipulation at 4-5 (“Parties agree to hold stakeholder workshops on single-issue ratemaking, automatic adjustment clause (AAC), PCAM, and decoupling.”).
- xvi OPUC Order 23-386.
- xvii UE 435 – PGE/100, Pope-Sims/6-6 (*see* UE 416 - ; UE 416 – CUB/200, Jenks/2-32).
- xviii UE 416 – Exec. Summary at 5-6; UE 416 – PGE/1300/Macfarlane – Pleasant/45-46 (“We propose to clarify that standalone energy storage that is used to integrate and firm renewables on a utility’s system qualifies as “associated energy storage... Given that these resources will be in-service in the next two years, now is the time to clarify the meaning of “associated storage” in the RAC, where PGE proposes the clarification to Schedule 122 that “associated storage” includes any energy storage used to integrate and firm renewable resources.”). *See* UE 416 - CUB/200, Jenks/51-55 for CUB discussion (OPUC Docket Nos. UM 1856, UE 335, and UE 416); *see also* OPUC Docket No. AR 616, CUB’s Comments available at <https://edocs.puc.state.or.us/efdocs/HAC/ar616hac133734.pdf>.
- xix OPUC Order 23-386 at 13.
- xx UE 435 – PGE/100, Pope-Sims/5-6, 29.
- xxi UE 435 – PGE/100, Pope-Sims/6; UE 435 – PGE/100/Pope – Sims/6.
- xxii UE 435 – Exec. Summary at 4; UE 435 – PGE/100, Pope-Sims/6; UE 435 – PGE /400, Bekkedahl – Felton/16-18.
- xxiii UE 416 – Second Partial Stipulation, Fourth Partial Stipulation, and Sixth Partial Stipulation.
- xxiv OPUC Order 23-386 at 12, 28- 46
- xxv UE 435 – Exec. Summary at 8.
- xxvi UE 416 – PGE/100, Pope-Sims/19.
- xxvii UE 416 – Sixth Partial Stipulation at 3; UE 416 – Sixth Partial Stipulation, Stipulating Parties/400, Joint Testimony/8.
- xxviii OPUC Order 23-386.
- xxix UE 435 – Exec. Summary at 9.
- xxx UE 416 – PGE/200, Batzler-Ferchland/2; UE 435 – Exec. Summary at 2 (PGE says 9.5% ROE is below the level needed to maintain PGE’s credit ratings and attract capital; projected test year results show 2.24% ROE; witness Villadsen sets range at 9.7-10.4%).
- xxxi UE 416 – Sixth Partial Stipulation at 3; UE 416 – Sixth Partial Stipulation, Stipulating Parties/400, Joint Testimony/8.
- xxxii OPUC Order 23-386.
- xxxiii UE 435 – PGE/100, Pope-Sims/ 29.
- xxxiv UE 435 – PGE/100, Pope – Sims/30; UE 435 – Exec. Summary at 3 (per PGE: 9.5% ROE is below the level needed to maintain PGE’s credit ratings and attract capital; projected test results show 5.29% ROE, once Constable and Seaside are operational, 4.38% ROE; witness Figueora sets range at 10.25-11.25% ROE).
- xxxv UE 416 – PGE/1300, Macfarlane – Pleasant/13-14.
- xxxvi *See* PGE Schedule 7 tariff.
- xxxvii UE 435 – Exec. Summary at 5.
- xxxviii UE 435 – PGE/900, Macfarlane – Pleasant/20.
- xxxix UE 416 – PGE/200, Batzler – Ferchland/6.
- xl UE 416 – Second Partial Stipulation at 2.
- xli Order 23-386 at 12; *see* PGE Schedule 7 tariff.
- xlii UE 435 – PGE/200, Batzler – Ferchland/10.

<sup>xliii</sup> UE 435 – Exec. Summary at 9; PGE/500, Felton/25, 29 ( \$17.3m revenue requirement (online by Jan. 2025); Seaside battery: revenue requirement \$49.5 million and rate base of \$369.7 million (online in first have 2025

<sup>xliv</sup> UE 435 – Exec. Summary at 9; PGE/500, Felton/30-32.

<sup>xliv</sup> UE 435 – PGE/100, Pope-Sims/6; UE 435 – PGE/100/Pope – Sims/6.

<sup>xlvi</sup> UE 435 – Exec. Summary at 4; UE 435 – PGE/100, Pope-Sims/6; UE 435 – PGE /400, Bekkedahl – Felton/16-18.

## **Attachment G**

**Petition to the Oregon Public Utility Commission on UE 435**

We are a group of Oregon utility customers who strongly encourage the Commission to reject PGE's request to raise rates by 7.2% for Oregon households.

Thousands of PGE customers are still reeling from the rate increase and ice storm bills this January. PGE's rates for Oregon households have already gone up by 30% from December 2022 to January 2024. People cannot afford these increases. Now is not the time to entertain PGE's unreasonable request to raise bills. We are counting on you, the Commission, to put a stop to this and protect customers like me.

PGE has requested \$202 million under the guise of needing more money for battery storage projects. Only about \$17 million is for battery storage. Instead, this case is a wishlist for management and includes many issues the Commission rejected just months ago. We cannot keep allowing utilities to continuously ask for the same bad policy over and over again.

We are calling on the Commission to dismiss this case (UE 435) and grant the motion submitted by Oregon Citizens' Utility Board.

	<b>Full Name</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>	<b>Home Zip/Postal</b>
1	B.C. Shelby	B.C.	Shelby	3/14/2024	97209
2	Kate Szrom	Kate	Szrom	3/14/2024	97206
3	Jo Rossman	Jo	Rossman	3/14/2024	97123
4	John and Vicki Cameron	John and Vicki	Cameron	3/14/2024	97213
5	Judith Aftergut	Judith	Aftergut	3/14/2024	97221
6	Noreen Lesage	Noreen	Lesage	3/14/2024	97034
7	John Ortiz	John	Ortiz	3/14/2024	97060
8	Kristin Smith	Kristin	Smith	3/14/2024	97209
9	Josiah Wagner	Josiah	Wagner	3/14/2024	97006
10	Sasha Pollack	Sasha	Pollack	3/14/2024	97239
11	Thomas Holley	Thomas	Holley	3/14/2024	97230
12	John Frohnmayr	John	Frohnmayr	3/14/2024	97504
13	David Potts	David	Potts	3/14/2024	97113
14	Chris Partipilo	Chris	Partipilo	3/14/2024	97007
15	Yvonne Phipps	Yvonne	Phipps	3/14/2024	97140

16	Michael Halloran	Michael	Halloran	3/14/2024	97305
17	Ed Miska	Ed	Miska	3/14/2024	97068
18	Beverly White	Beverly	White	3/14/2024	97224
19	Linda Meier	Linda	Meier	3/14/2024	97219
20	Judy Piercy	Judy	Piercy	3/14/2024	97322
21	John Huseby	John	Huseby	3/14/2024	97223
22	Marcus Tobey	Marcus	Tobey	3/14/2024	97007
23	Patty Wentz	Patty	Wentz	3/14/2024	97215
24	Warren Mcelhaney	Warren	Mcelhaney	3/14/2024	97210
25	Asa DeCouteau	Asa	DeCouteau	3/14/2024	97203
26	Clarence Cullop	Clarence	Cullop	3/14/2024	97501
27	Mollie Butler	Mollie	Butler	3/14/2024	97230
28	Clarence Cullop	Clarence	Cullop	3/14/2024	97501
29	Rory Isbell	Rory	Isbell	3/14/2024	97702
30	Joe Hovey	Joe	Hovey	3/14/2024	97202
31	Noah Brockman	Noah	Brockman	3/14/2024	97219
32	John Herrmann	John	Herrmann	3/14/2024	97215
33	David Kay	David	Kay	3/14/2024	97236
34	Eli Spevak	Eli	Spevak	3/14/2024	97218
35	Glen Comuntzis	Glen	Comuntzis	3/14/2024	97223
36	Josh Weissert	Josh	Weissert	3/14/2024	97068
37	Charlene Whiting	Charlene	Whiting	3/14/2024	97381
38	Amy Murray	Amy	Murray	3/14/2024	97206
39	Deborah A Carey	Deborah A	Carey	3/14/2024	97333
40	Amy Carlson	Amy	Carlson	3/14/2024	97217
41	Mary Lane Stevens	Mary Lane	Stevens	3/14/2024	97214
42	John Nettleton	John	Nettleton	3/14/2024	97202
43	Janice Bird	Janice	Bird	3/14/2024	97857
44	Sarah Wochele	Sarah	Wochele	3/14/2024	97211
45	Mary Anne Joyce	Mary Anne	Joyce	3/14/2024	97215
46	Barbara Backstrand	Barbara	Backstrand	3/14/2024	97209
47	Marie Wakefield	Marie	Wakefield	3/14/2024	97365
48	Patricia Jacobson	Patricia	Jacobson	3/14/2024	97070

49	David Cameron	David	Cameron	3/14/2024	97124
50	Paul F Nett	Paul F	Nett	3/14/2024	97233
51	Loren Beach	Loren	Beach	3/14/2024	97219
52	ROBERT PLATA	ROBERT	PLATA	3/14/2024	97303
53	Alfred Beltram	Alfred	Beltram	3/14/2024	97321
54	Missy Lee	Missy	Lee	3/14/2024	97266
55	Paul Wooley	Paul	Wooley	3/14/2024	97078
56	Andrea Manning	Andrea	Manning	3/14/2024	97214
57	Ted Tosterud	Ted	Tosterud	3/14/2024	97024
58	Bruce Watt	Bruce	Watt	3/14/2024	97219
59	Angela Singleton	Angela	Singleton	3/14/2024	97236
60	Mariane Zenker	Mariane	Zenker	3/14/2024	97206
61	Marsha Schauer	Marsha	Schauer	3/14/2024	97007
62	Jess DePew	Jess	DePew	3/14/2024	97355
63	Paul Sansone	Paul	Sansone	3/14/2024	97117
64	s cook	s	cook	3/14/2024	97236
65	Steven Goldberg	Steven	Goldberg	3/14/2024	97202
66	Ted Saufley	Ted	Saufley	3/14/2024	97132
67	Linda Lee Showerman	Linda Lee	Showerman	3/14/2024	97530
68	Frances Greenlee	Frances	Greenlee	3/14/2024	97703
69	Janet Schaeffer	Janet	Schaeffer	3/14/2024	97202
70	Rod Terry	Rod	Terry	3/14/2024	97330
71	Laura Roe	Laura	Roe	3/14/2024	97206
72	Carolyn Eckel	Carolyn	Eckel	3/14/2024	97230
73	Lockhart Jim	Lockhart	Jim	3/14/2024	97424
74	Christopher Braun	Christopher	Braun	3/14/2024	97202
75	Phyllis Jaskowiak	Phyllis	Jaskowiak	3/14/2024	97036
76	Richard Edwards	Richard	Edwards	3/14/2024	97034
77	Mary Henty	Mary	Henty	3/14/2024	97215
78	Erica S Rubin	Erica S	Rubin	3/14/2024	97212
79	Anne Reeser	Anne	Reeser	3/14/2024	97212
80	Teresa DeLorenzo	Teresa	DeLorenzo	3/14/2024	97103
81	L D	L	D	3/14/2024	97520



82	James Welsh	James	Welsh	3/14/2024	97224
83	Rebecca Kimsey	Rebecca	Kimsey	3/14/2024	97385
84	David Nichols	David	Nichols	3/14/2024	97213
85	Brian Yorgey	Brian	Yorgey	3/14/2024	97330
86	SHAWNA MCKEOWN	SHAWNA	MCKEOWN	3/14/2024	97214
87	CARY RANSOME	CARY	RANSOME	3/14/2024	97236
88	Joan Bradley	Joan	Bradley	3/14/2024	97206
89	Mary Freeman	Mary	Freeman	3/14/2024	97132
90	Lynn Cardiff	Lynn	Cardiff	3/14/2024	97301
91	Randy Harrison	Randy	Harrison	3/14/2024	97402
92	Natalie Marburger	Natalie	Marburger	3/14/2024	97239
93	Alina Hyde	Alina	Hyde	3/14/2024	97080
94	James Wygant	James	Wygant	3/14/2024	97202
95	Julie Brockman	Julie	Brockman	3/14/2024	97219
96	Phyllis Oster	Phyllis	Oster	3/14/2024	97205
97	KARIN WRIGGLE	KARIN	WRIGGLE	3/14/2024	97225
98	Julie Blackman	Julie	Blackman	3/14/2024	97221
99	Kathy Keyes	Kathy	Keyes	3/14/2024	97214
100	Ray Neff	Ray	Neff	3/14/2024	97405
101	Susan Heath	Susan	Heath	3/14/2024	97322
102	Craig Emerick	Craig	Emerick	3/14/2024	97330
103	Andrew Gray	Andrew	Gray	3/14/2024	97333
104	David Hawley	David	Hawley	3/15/2024	97321
105	Sandra Joos	Sandra	Joos	3/15/2024	97239
106	Edward S May	Edward S	May	3/14/2024	97007
107	Ellen Eberhardt	Ellen	Eberhardt	3/16/2024	97330
108	Estelle Voeller	Estelle	Voeller	3/19/2024	97501
109	GORDON FEIGHNER	GORDON	FEIGHNER	3/15/2024	97215
110	Hal B Anthony	Hal B	Anthony	3/16/2024	97526
111	Joyce Green	Joyce	Green	3/16/2024	97267
112	Kenneth Snider	Kenneth	Snider	3/14/2024	97233
113	Laurie Todd	Laurie	Todd	3/18/2024	97214
114	Mike LaPorte	Mike	LaPorte	3/15/2024	97223

115	Nola Becket	Nola	Becket	3/15/2024	97203
116	Patricia N Biggs	Patricia N	Biggs	3/15/2024	97224
117	Ramona Crocker	Ramona	Crocker	3/14/2024	97008
118	Rebecca Clark	Rebecca	Clark	3/16/2024	97203
119	Richard Reid	Richard	Reid	3/15/2024	97302
120	Roger Widenoja	Roger	Widenoja	3/15/2024	97638
121	Derrek Newell	Derrek	Newell	3/15/2024	97266
122	Dianne Ensign	Dianne	Ensign	3/15/2024	97219
123	Donna Steadman	Donna	Steadman	3/14/2024	97224
124	Ed Motteler	Ed	Motteler	3/14/2024	97223
125	Gwen Dulley	Gwen	Dulley	3/16/2024	97209
126	Helen Beckman	Helen	Beckman	3/16/2024	97303
127	John Doherty	John	Doherty	3/15/2024	97504
128	Karen Springer	Karen	Springer	3/15/2024	97225
129	Matthew Gray	Matthew	Gray	3/14/2024	97330
130	Maureen O'Neal	Maureen	O'Neal	3/14/2024	97223
131	Melissa Hathaway	Melissa	Hathaway	3/19/2024	97230
132	Michael Wolf	Michael	Wolf	3/15/2024	97212
133	Michael Wolf	Michael	Wolf	3/15/2024	97212
134	Nieba Paige	Nieba	Paige	3/14/2024	97215
135	Phil Miotto	Phil	Miotto	3/17/2024	97219
136	Sandra Siegner	Sandra	Siegner	3/15/2024	97219
137	Sheila Nelson	Sheila	Nelson	3/17/2024	97333
138	Carolyn Matthews	Carolyn	Matthews	3/15/2024	97218
139	Sherry Monie	Sherry	Monie	3/15/2024	97089
140	Peter Neva	Peter	Neva	3/15/2024	97303
141	Robert Thrasher	Robert	Thrasher	3/15/2024	97267
142	Jeanine Yows	Jeanine	Yows	3/15/2024	97302
143	Margaret Heydon	Margaret	Heydon	3/15/2024	97230
144	Andrea Heid	Andrea	Heid	3/15/2024	97002
145	Priscilla Lane	Priscilla	Lane	3/15/2024	97215
146	Thomas J Cherry	Thomas J	Cherry	3/15/2024	97210
147	William Obrien	William	Obrien	3/15/2024	98685

148	D. Deloff	D.	Deloff	3/15/2024	97078
149	Mary Lynn Willis Parodi	Mary Lynn Willis	Parodi	3/14/2024	97223
150	Samantha Hernandez	Samantha	Hernandez	3/19/2024	97211
151	Bob Rossi	Bob	Rossi	3/15/2024	97301
152	Sasha Pollack	Sasha	Pollack	3/19/2024	97239
153	William Steven Herz	William Steven	Herz	3/15/2024	97709
154	Pamela Gurnari	Pamela	Gurnari	3/15/2024	97214
155	Ann Turner	Ann	Turner	3/20/2024	97211
156	Laurie Brooks	Laurie	Brooks	3/16/2024	97223
157	MATTHEW ZLATNIK	MATTHEW	ZLATNIK	3/15/2024	97068
158	Amy Levin	Amy	Levin	3/15/2024	97420
159	Linda Ganzini	Linda	Ganzini	3/16/2024	97034
160	Kimberly Keller	Kimberly	Keller	3/14/2024	97411
161	David C Parker	David C	Parker	3/18/2024	97214
162	Ally Harris	Ally	Harris	3/15/2024	97202
163	Larry De Young	Larry	De Young	3/15/2024	97321
164	Arlene Sherrett	Arlene	Sherrett	3/20/2024	97267
165	Mitch Williams	Mitch	Williams	3/15/2024	97011
166	Julie Entrekin	Julie	Entrekin	3/17/2024	97214
167	Angela Bennett	Angela	Bennett	3/18/2024	97201
168	Nikki Hahn	Nikki	Hahn	3/20/2024	97301
169	Catherine Cornelius	Catherine	Cornelius	3/14/2024	97219
170	Linda McGavin	Linda	McGavin	3/17/2024	97222
171	Elisa Kozma	Elisa	Kozma	3/16/2024	97019
172	Janice Rose	Janice	Rose	3/15/2024	97017
173	Daniel Stillwaggon	Daniel	Stillwaggon	3/15/2024	97215
174	garry smith	garry	smith	3/18/2024	97383
175	lisa anne ross	lisa anne	ross	3/14/2024	97211
176	Myriam Alaux	Myriam	Alaux	3/14/2024	97209
177	Bruce Podobnik	Bruce	Podobnik	3/14/2024	97202
178	Sally Thomas	Sally	Thomas	3/14/2024	97206
179	Sheridan Horning	Sheridan	Horning	3/15/2024	97202
180	Steven Chritiansen	Steven	Chritiansen	3/15/2024	97008

181	C Gamblin	C	Gamblin	3/15/2024	97239
182	Torin Lee	Torin	Lee	3/15/2024	97217
183	Justin Reynolds	Justin	Reynolds	3/15/2024	97232
184	Phil Harris	Phil	Harris	3/15/2024	97206
185	Elizabeth Shaffer	Elizabeth	Shaffer	3/15/2024	97219
186	Gentiana Loeffler	Gentiana	Loeffler	3/15/2024	97202
187	Greg Martin	Greg	Martin	3/15/2024	97215
188	Savannah Burdick	Savannah	Burdick	3/15/2024	97201
189	Emily Kinney	Emily	Kinney	3/15/2024	97202
190	Stevyn Llewellyn	Stevyn	Llewellyn	3/15/2024	97231
191	Jon Hollenbeak	Jon	Hollenbeak	3/15/2024	97203
192	Ezra Spencer	Ezra	Spencer	3/15/2024	97231
193	Ryan Miller	Ryan	Miller	3/15/2024	97133
194	David Levcovitz	David	Levcovitz	3/15/2024	97266
195	Mochael Lockwood	Mochael	Lockwood	3/15/2024	97005
196	Cameron Booth	Cameron	Booth	3/15/2024	97217
197	JOHN MADDALENA	JOHN	MADDALENA	3/15/2024	97232
198	Elisabeth Hollenbeak	Elisabeth	Hollenbeak	3/15/2024	97203
199	Lindsey Uhl	Lindsey	Uhl	3/15/2024	97206
200	Mandi Smith	Mandi	Smith	3/15/2024	97030
201	Jennifer Davis	Jennifer	Davis	3/15/2024	97202
202	DM Dancey	DM	Dancey	3/15/2024	97202
203	Linda Gamberg	Linda	Gamberg	3/15/2024	97267
204	Dawn Parker	Dawn	Parker	3/15/2024	97215
205	Courtney Snyder	Courtney	Snyder	3/15/2024	97230
206	Alex Kozma	Alex	Kozma	3/16/2024	97019
207	Paul Fishman	Paul	Fishman	3/17/2024	97214
208	Rick Silverman	Rick	Silverman	3/17/2024	97239
209	Krista Reynolds	Krista	Reynolds	3/18/2024	97068
210	Michael Phipps	Michael	Phipps	3/18/2024	97140
211	Michael Phipps	Michael	Phipps	3/18/2024	97140
212	Jeremiah Graff	Jeremiah	Graff	3/19/2024	97202
213	Yasmin Amirsoleymani	Yasmin	Amirsoleymani	3/19/2024	97218

214	Jennifer McMillan	Jennifer	McMillan	3/19/2024	97030
215	Britney VanCitters	Britney	VanCitters	3/19/2024	97266
216	Robert Sanchez	Robert	Sanchez	3/19/2024	97217
217	Patricia Kullberg	Patricia	Kullberg	3/19/2024	97202
218	Ben Golder	Ben	Golder	3/19/2024	97219
219	Wendy Cluse	Wendy	Cluse	3/19/2024	97223
220	Elizabeth Lampman	Elizabeth	Lampman	3/19/2024	97211
221	Melissa Trillo	Melissa	Trillo	3/19/2024	97206
222	Travis Linthicum	Travis	Linthicum	3/19/2024	97206
223	Suzanne Biehl	Suzanne	Biehl	3/20/2024	97232
224	Jessica Allegri	Jessica	Allegri	3/20/2024	97005
225	Rachael ODonnell	Rachael	ODonnell	3/20/2024	97218
226	Felisha Pooler	Felisha	Pooler	3/20/2024	97055
227	Carolyn Hahn	Carolyn	Hahn	3/20/2024	97301
228	Theodora Tsongas	Theodora	Tsongas	3/20/2024	97215
229	Brittany Bettis	Brittany	Bettis	3/20/2024	97005
230	James Belcher	James	Belcher	3/20/2024	97209
231	Ryan Shepard	Ryan	Shepard	3/20/2024	97239
232	Caroline Koenig	Caroline	Koenig	3/20/2024	97214
233	Rachel Philips	Rachel	Philips	3/20/2024	97206
234	Mary Moreno	Mary	Moreno	3/20/2024	97212
235	Anna West	Anna	West	3/20/2024	97211
236	NATHANIAL MIDNIGHT	NATHANIAL	MIDNIGHT	3/20/2024	97206
237	Shelby Pierce	Shelby	Pierce	3/20/2024	97206
238	Elio James	Elio	James	3/20/2024	97214
239	Abigail Diller	Abigail	Diller	3/20/2024	97206
240	Matthew Palmer	Matthew	Palmer	3/20/2024	97202
241	Margaret Hawthorne	Margaret	Hawthorne	3/20/2024	97212
242	Karly Enger	Karly	Enger	3/20/2024	97219
243	Anna Parks	Anna	Parks	3/20/2024	97201
244	Sam Becht	Sam	Becht	3/20/2024	97214
245	Joanna Cowan	Joanna	Cowan	3/20/2024	97211
246	Jenna Goldin	Jenna	Goldin	3/20/2024	97220

247	Ruthie Crawford	Ruthie	Crawford	3/20/2024	97213
248	Sofia Murray	Sofia	Murray	3/20/2024	97214
249	Arlene Flynn	Arlene	Flynn	3/20/2024	97203
250	Rhys Hallett	Rhys	Hallett	3/20/2024	97202
251	Jacob Hendrix	Jacob	Hendrix	3/20/2024	97202
252	Jennifer Eisele	Jennifer	Eisele	3/20/2024	97206
253	Whitney Peterson	Whitney	Peterson	3/20/2024	97202
254	Taylor Vickers	Taylor	Vickers	3/20/2024	97205
255	Nickolas Grill	Nickolas	Grill	3/20/2024	97215
256	Erin Walker	Erin	Walker	3/20/2024	97213
257	Evan Goldenrod	Evan	Goldenrod	3/20/2024	97214
258	Derek Longoria-Gomez	Derek	Longoria-Gomez	3/20/2024	97202
259	Thomas Parks	Thomas	Parks	3/20/2024	97201
260	Kiera Hansen	Kiera	Hansen	3/20/2024	97230
261	Sidney Horn	Sidney	Horn	3/20/2024	97223
262	David Neham	David	Neham	3/20/2024	97239
263	Andra McFarlane	Andra	McFarlane	3/20/2024	97217
264	Kyra Sherrin	Kyra	Sherrin	3/20/2024	97203
265	Rachel Springer	Rachel	Springer	3/20/2024	97212
266	Kristin Smith	Kristin	Smith	3/20/2024	97213
267	Tracy Rollins	Tracy	Rollins	3/20/2024	97266
268	Reina Rich	Reina	Rich	3/20/2024	97217
269	Daisy Macias Arellano	Daisy	Macias Arellano	3/20/2024	97230
270	Marcus Mennes	Marcus	Mennes	3/20/2024	97217
271	Julie Madsen	Julie	Madsen	3/20/2024	97217
272	Christina St marie	Christina	St marie	3/20/2024	97230
273	Izabelle Kenoyer	Izabelle	Kenoyer	3/20/2024	97215
274	Olivia Young	Olivia	Young	3/20/2024	97217
275	Lindsay Dees	Lindsay	Dees	3/20/2024	97206
276	Alexis Harris	Alexis	Harris	3/20/2024	97214
277	Sharma Sullivan	Sharma	Sullivan	3/20/2024	97232
278	Finn Oviatt	Finn	Oviatt	3/20/2024	97202
279	Sumita Mukund	Sumita	Mukund	3/20/2024	97206

280	Samantha Schurter	Samantha	Schurter	3/20/2024	97206
281	Shannon McMullen	Shannon	McMullen	3/20/2024	97211
282	Manda BOREALIS	Manda	BOREALIS	3/20/2024	97217
283	Audra McCabe	Audra	McCabe	3/20/2024	97227
284	Yvonne Miller	Yvonne	Miller	3/20/2024	97216
285	Jade Tapley	Jade	Tapley	3/20/2024	97217
286	Nicholas Escobar	Nicholas	Escobar	3/20/2024	97220
287	Ben Asher	Ben	Asher	3/20/2024	97213
288	Monique Chavez	Monique	Chavez	3/20/2024	97060
289	Alexis Sosa	Alexis	Sosa	3/20/2024	97213
290	Kristina Howe	Kristina	Howe	3/20/2024	97203
291	Whitney Handrich	Whitney	Handrich	3/20/2024	97232
292	Ady Romero	Ady	Romero	3/20/2024	97060
293	Sarah Gross	Sarah	Gross	3/20/2024	97222
294	Toni Ruiz	Toni	Ruiz	3/20/2024	97212
295	Drew Flowers	Drew	Flowers	3/20/2024	97266
296	Camila Schlesinger	Camila	Schlesinger	3/20/2024	97215
297	Jon Garcia	Jon	Garcia	3/20/2024	97219
298	Chelsea Grubbs	Chelsea	Grubbs	3/20/2024	97214
299	Calvin French	Calvin	French	3/20/2024	97232
300	Valerie Cochran	Valerie	Cochran	3/20/2024	97217
301	Mary Vest	Mary	Vest	3/20/2024	97232
302	Evalena Fox	Evalena	Fox	3/20/2024	97060
303	Ximena Quiroz	Ximena	Quiroz	3/20/2024	97211
304	isabela villarreal	isabela	villarreal	3/20/2024	97215
305	Christianna Wincek	Christianna	Wincek	3/20/2024	97203
306	Olivia Burns	Olivia	Burns	3/20/2024	97003
307	Emily Herbert	Emily	Herbert	3/22/2024	97232
308	Valerie Stanik	Valerie	Stanik	3/21/2024	97333
309	Jessica Martinez Medina	Jessica	Martinez Medina	3/22/2024	97233
310	Blanca Gutierrez	Blanca	Gutierrez	3/21/2024	97501
311	Emily Schnipper	Emily	Schnipper	3/22/2024	97206
312	Erin Walker	Erin	Walker	3/22/2024	97213

313	isabela villarreal	isabela	villarreal	3/21/2024	97215
314	Chantel Broad	Chantel	Broad	3/20/2024	97203
315	Kacey Desantis	Kacey	Desantis	3/20/2024	97230
316	Paige Icardi	Paige	Icardi	3/20/2024	97230
317	Paige Icardi	Paige	Icardi	3/22/2024	97230
318	Kristine Mayle	Kristine	Mayle	3/20/2024	97203
319	rachel Mulder	rachel	Mulder	3/20/2024	97202
320	Courtney Bridges	Courtney	Bridges	3/20/2024	97206
321	Nick Harris	Nick	Harris	3/20/2024	97218
322	Cat Hollis	Cat	Hollis	3/20/2024	97266
323	Chad Glazener	Chad	Glazener	3/20/2024	97233
324	Heidi Liedeker	Heidi	Liedeker	3/20/2024	97206
325	Kim Howe	Kim	Howe	3/20/2024	97217
326	Elizabeth Allen	Elizabeth	Allen	3/20/2024	97220
327	Venniessa Simmerman	Venniessa	Simmerman	3/20/2024	97206
328	Christina Maul	Christina	Maul	3/20/2024	97213
329	Jacqueline Dean	Jacqueline	Dean	3/20/2024	97266
330	Kimberly Kimble	Kimberly	Kimble	3/20/2024	97209
331	angela mignone	angela	mignone	3/20/2024	97206
332	Emily Andrews	Emily	Andrews	3/20/2024	97231
333	Tabitha DeLorio	Tabitha	DeLorio	3/20/2024	97220
334	megan marchetti	megan	marchetti	3/20/2024	97220
335	David Sugerik	David	Sugerik	3/20/2024	97267
336	France Anton	France	Anton	3/20/2024	97217
337	Liz Pettengill	Liz	Pettengill	3/20/2024	97232
338	Aysha Kelley	Aysha	Kelley	3/20/2024	97221
339	K. Abrams	K.	Abrams	3/20/2024	97219
340	Maia Watkins	Maia	Watkins	3/20/2024	97215
341	Holly McGuire	Holly	McGuire	3/20/2024	97217
342	Kiya Tenney	Kiya	Tenney	3/20/2024	97213
343	Brice Suprenant	Brice	Suprenant	3/20/2024	97206
344	Devon Newby	Devon	Newby	3/20/2024	97212
345	Molly Hogan	Molly	Hogan	3/20/2024	97217



346	Tatiana Andre	Tatiana	Andre	3/20/2024	97236
347	Rebekah Odgear	Rebekah	Odgear	3/21/2024	97239
348	Annie Ramey	Annie	Ramey	3/21/2024	97232
349	Jillian Kolbe	Jillian	Kolbe	3/21/2024	97214
350	Sofia Zancock	Sofia	Zancock	3/21/2024	97206
351	Nancy Guidry	Nancy	Guidry	3/21/2024	97203
352	Robin Burgess	Robin	Burgess	3/21/2024	97206
353	Laura Braun	Laura	Braun	3/21/2024	97211
354	Nikia Mcmillen	Nikia	Mcmillen	3/21/2024	97214
355	Diana Iglesias	Diana	Iglesias	3/21/2024	97214
356	Alyssa Knutson	Alyssa	Knutson	3/21/2024	97209
357	Kelly Mason	Kelly	Mason	3/21/2024	97035
358	Carol Mollet	Carol	Mollet	3/21/2024	97231
359	Beq Yonaka	Beq	Yonaka	3/21/2024	97206
360	James-Elizabeth Davis	James-Elizabeth	Davis	3/21/2024	97005
361	Brooke Herout	Brooke	Herout	3/21/2024	97212
362	Courtney Hudnall	Courtney	Hudnall	3/21/2024	97233
363	Andy Anderson	Andy	Anderson	3/21/2024	97233
364	Yasmin Gurhan	Yasmin	Gurhan	3/21/2024	97236
365	Elle Wong	Elle	Wong	3/21/2024	97215
366	Adriana Deligio	Adriana	Deligio	3/21/2024	97206
367	Vanessa Grant Coats	Vanessa	Grant Coats	3/21/2024	97232
368	Nicole Robinson	Nicole	Robinson	3/21/2024	97202
369	Thorne Davis	Thorne	Davis	3/21/2024	97217
370	Saff Addams	Saff	Addams	3/21/2024	97213
371	Nicola Cort	Nicola	Cort	3/21/2024	97225
372	Moss Hatheway	Moss	Hatheway	3/21/2024	97202
373	Diana Press	Diana	Press	3/21/2024	97215
374	Valerie Osterberg	Valerie	Osterberg	3/21/2024	97206
375	Laura Gordon	Laura	Gordon	3/21/2024	97214
376	Jereth Hirsch	Jereth	Hirsch	3/21/2024	97006
377	Melinda Strnad	Melinda	Strnad	3/21/2024	97210
378	Morgin Carpenter	Morgin	Carpenter	3/21/2024	97266

379	Amy Ruth	Amy	Ruth	3/21/2024	97005
380	Rocio Cruz	Rocio	Cruz	3/21/2024	97233
381	Noah Rappaport	Noah	Rappaport	3/21/2024	97202
382	Angel Lawler	Angel	Lawler	3/21/2024	97266
383	Samantha Richards Davidson	Samantha	Richards Davidson	3/21/2024	97124
384	Diana Kruse	Diana	Kruse	3/21/2024	97224
385	Blanca Perez	Blanca	Perez	3/21/2024	97233
386	EL TRAN	EL	TRAN	3/21/2024	97203
387	Beth Fuller	Beth	Fuller	3/21/2024	97215
388	Jamal Qutub	Jamal	Qutub	3/21/2024	97203
389	Mike Beach	Mike	Beach	3/21/2024	97231
390	Heather Mastel-Lipson	Heather	Mastel-Lipson	3/21/2024	97219
391	Sage Lingenfelter	Sage	Lingenfelter	3/21/2024	97213
392	Jared Kzy	Jared	Kzy	3/21/2024	97215
393	M McLaughlin	M	McLaughlin	3/21/2024	97008
394	Alexander Mahan	Alexander	Mahan	3/21/2024	97215
395	Emily Criswell	Emily	Criswell	3/21/2024	97202
396	jayden becker	jayden	becker	3/21/2024	97206
397	Crystal T	Crystal	T	3/21/2024	97214
398	Lauren Fairshter	Lauren	Fairshter	3/21/2024	97227
399	JD Cox	JD	Cox	3/21/2024	97266
400	Ethan Lamb	Ethan	Lamb	3/21/2024	97219
401	Sean Rodgers	Sean	Rodgers	3/21/2024	97218
402	sarah coderre	sarah	coderre	3/21/2024	97211
403	Melissa Hicks	Melissa	Hicks	3/21/2024	97030
404	Rachel McDermott	Rachel	McDermott	3/21/2024	97232
405	Ellie Doney	Ellie	Doney	3/21/2024	97223
406	Sarah Giffrow	Sarah	Giffrow	3/21/2024	97217
407	Misela Meristil	Misela	Meristil	3/21/2024	97229
408	Jamie Zurn	Jamie	Zurn	3/21/2024	97215
409	Tyler Owings	Tyler	Owings	3/21/2024	97206
410	Ryan Holmes	Ryan	Holmes	3/21/2024	97220
411	Kaitlyn Seres	Kaitlyn	Seres	3/21/2024	97209

412	Dustin Eiler	Dustin	Eiler	3/21/2024	97213
413	Laura Burkhart	Laura	Burkhart	3/21/2024	97219
414	Summer Feist	Summer	Feist	3/21/2024	97080
415	Carlos Sanchez Huizar	Carlos	Sanchez Huizar	3/21/2024	97230
416	luna lininger-salazar	luna	lininger-salazar	3/21/2024	97232
417	Alexis McCain	Alexis	McCain	3/21/2024	97220
418	Victoria Varty	Victoria	Varty	3/21/2024	97212
419	Emma Perry	Emma	Perry	3/21/2024	97266
420	Veronica Avola	Veronica	Avola	3/21/2024	97293
421	Alex Beckers	Alex	Beckers	3/21/2024	97214
422	Kyrstin Pinsly	Kyrstin	Pinsly	3/21/2024	97232
423	Denis Bielenberg	Denis	Bielenberg	3/21/2024	97217
424	Dani Allsup	Dani	Allsup	3/21/2024	97203
425	Karra Chaltraw	Karra	Chaltraw	3/21/2024	97206
426	Samantha Pletcher	Samantha	Pletcher	3/21/2024	97214
427	Chelsea Hetelson	Chelsea	Hetelson	3/21/2024	97202
428	Kiera Jenkins	Kiera	Jenkins	3/21/2024	97206
429	Emily Miller	Emily	Miller	3/21/2024	97202
430	Lynsea Coy	Lynsea	Coy	3/21/2024	97215
431	Tracy Hill	Tracy	Hill	3/21/2024	97233
432	Sydney Walden	Sydney	Walden	3/21/2024	97215
433	Winter Wagner	Winter	Wagner	3/21/2024	97232
434	Peren Smith	Peren	Smith	3/21/2024	97201
435	Camille Carson	Camille	Carson	3/21/2024	97113
436	Kelly OHanley	Kelly	OHanley	3/21/2024	97213
437	Christina Jackson	Christina	Jackson	3/21/2024	97223
438	Randi Ulrich	Randi	Ulrich	3/21/2024	97214
439	Katie Morrissett	Katie	Morrissett	3/21/2024	97206
440	Ashlee Jacobson Dunbar	Ashlee	Jacobson Dunbar	3/21/2024	97206
441	Jreyesha Brannon	Jreyesha	Brannon	3/21/2024	97220
442	Summer Wintersteen	Summer	Wintersteen	3/21/2024	97068
443	Michelle Mcmillan	Michelle	Mcmillan	3/21/2024	97202
444	Amica Hunter	Amica	Hunter	3/21/2024	97293

445	Amica Hunter	Amica	Hunter	3/21/2024	97293
446	Kenny Taylor	Kenny	Taylor	3/21/2024	97206
447	Faith Burlingame	Faith	Burlingame	3/21/2024	97267
448	Maggie Rose	Maggie	Rose	3/21/2024	97266
449	Andrew Harris	Andrew	Harris	3/21/2024	97212
450	Jesse Duarte	Jesse	Duarte	3/21/2024	97210
451	Heaven Núñez	Heaven	Núñez	3/21/2024	97224
452	Abelle Roe	Abelle	Roe	3/21/2024	97206
453	Aaron Morales	Aaron	Morales	3/21/2024	97206
454	Ellian Nichols	Ellian	Nichols	3/21/2024	97202
455	Amy Rivera	Amy	Rivera	3/21/2024	97202
456	Madeleine Molina Cooper	Madeleine	Molina Cooper	3/21/2024	97202
457	Tony Bellsmith	Tony	Bellsmith	3/21/2024	97202
458	Maureen OBrien	Maureen	OBrien	3/21/2024	97211
459	Chloe Finley	Chloe	Finley	3/21/2024	97215
460	Olivia Bormann	Olivia	Bormann	3/21/2024	97206
461	Jae Siqueiros	Jae	Siqueiros	3/21/2024	97203
462	Jackson Guettler	Jackson	Guettler	3/21/2024	97227
463	Heather Fercho	Heather	Fercho	3/21/2024	97218
464	Monica Geigle	Monica	Geigle	3/21/2024	97267
465	Samuel Tobey	Samuel	Tobey	3/21/2024	97266
466	Maxwell Carey	Maxwell	Carey	3/21/2024	97203
467	Jordan Moody	Jordan	Moody	3/21/2024	97222
468	jenka soderberg	jenka	soderberg	3/21/2024	97233
469	Nikita Daryanani	Nikita	Daryanani	3/21/2024	97217
470	Grace Piper	Grace	Piper	3/21/2024	97236
471	Sharonda Jenkins	Sharonda	Jenkins	3/21/2024	29210
472	Tabbitha Wolfe	Tabbitha	Wolfe	3/21/2024	97223
473	Michelle Fraczek	Michelle	Fraczek	3/21/2024	97217
474	Gabrielle Stewart	Gabrielle	Stewart	3/21/2024	97214
475	Mia Perini	Mia	Perini	3/21/2024	97214
476	Alisia B	Alisia	B	3/21/2024	97209
477	Summer Bird	Summer	Bird	3/21/2024	97217

478	Susan Evans	Susan	Evans	3/21/2024	97215
479	HARRIET SHAKLEE	HARRIET	SHAKLEE	3/21/2024	97217
480	Stephen Mayes	Stephen	Mayes	3/21/2024	97702
481	Elexis Mendez	Elexis	Mendez	3/21/2024	97213
482	Lilla Fortunoff	Lilla	Fortunoff	3/21/2024	97225
483	KIRSTEN VOLNESS	KIRSTEN	VOLNESS	3/21/2024	97214
484	James Corcoran	James	Corcoran	3/21/2024	97214
485	A Wilson	A	Wilson	3/21/2024	97236
486	Aniko Zoltan	Aniko	Zoltan	3/21/2024	97213
487	Kelly Rauer	Kelly	Rauer	3/21/2024	97206
488	Karen Miles	Karen	Miles	3/21/2024	97217
489	Tekiah Elzey	Tekiah	Elzey	3/21/2024	97236
490	Katie Shammel	Katie	Shammel	3/21/2024	97202
491	Pacia Linde	Pacia	Linde	3/21/2024	97215
492	Kathryn Moody	Kathryn	Moody	3/21/2024	97215
493	Megan Hale	Megan	Hale	3/21/2024	97206
494	myrrh larsen	myrrh	larsen	3/21/2024	97214
495	Madeline Doss	Madeline	Doss	3/21/2024	97206
496	Andrew Howard	Andrew	Howard	3/21/2024	97211
497	Mia Lysaght	Mia	Lysaght	3/21/2024	97215
498	Emmett Allen	Emmett	Allen	3/21/2024	97219
499	coyote little warrior	coyote	little warrior	3/21/2024	97214
500	Yadira canseco	Yadira	canseco	3/21/2024	97080
501	Taylor Xóchihua	Taylor	Xóchihua	3/21/2024	97212
502	Sara Smith	Sara	Smith	3/21/2024	97232
503	Ruth Dallas	Ruth	Dallas	3/22/2024	97123
504	Deanna Mann	Deanna	Mann	3/22/2024	97225
505	Levi Campbell	Levi	Campbell	3/22/2024	97003
506	Zave Payne	Zave	Payne	3/22/2024	97202
507	Laura Pottorf	Laura	Pottorf	3/22/2024	97202
508	Magen Kelly	Magen	Kelly	3/22/2024	97217
509	Armaan Singh	Armaan	Singh	3/22/2024	97209
510	Doraly Perez	Doraly	Perez	3/22/2024	97215

511	Rio Moncrief	Rio	Moncrief	3/22/2024	97232
512	Allison Chang	Allison	Chang	3/22/2024	97214
513	Heavenli Rudd	Heavenli	Rudd	3/22/2024	97214
514	Cheryl Austin	Cheryl	Austin	3/22/2024	97221
515	Phillippe Gonzalez	Phillippe	Gonzalez	3/22/2024	97206
516	David Merrill	David	Merrill	3/22/2024	97203
517	Emily Prado	Emily	Prado	3/22/2024	97206
518	Sami Ebner Ebner	Sami Ebner	Ebner	3/22/2024	97206
519	Tai Faux	Tai	Faux	3/22/2024	97233
520	Monica Ghali	Monica	Ghali	3/22/2024	97214
521	Keri Mcnicholas	Keri	Mcnicholas	3/22/2024	97211
522	Michelle Krause	Michelle	Krause	3/22/2024	97206
523	Victoria Baker	Victoria	Baker	3/22/2024	97217
524	Brenna Bechtold	Brenna	Bechtold	3/22/2024	97266
525	Dejadira Ruelas	Dejadira	Ruelas	3/22/2024	97266
526	Olivia Zellweger	Olivia	Zellweger	3/22/2024	97211
527	Wendy Newsome	Wendy	Newsome	3/22/2024	97206
528	William Blackmore	William	Blackmore	3/22/2024	97266
529	Misti Miller	Misti	Miller	3/22/2024	97212
530	Navya Janapati	Navya	Janapati	3/22/2024	97209
531	Mary Hill	Mary	Hill	3/22/2024	97212
532	nora lubben	nora	lubben	3/22/2024	97232
533	Lisa Weathers	Lisa	Weathers	3/22/2024	97206
534	Juel Goodland	Juel	Goodland	3/22/2024	97267
535	Sarah Cavanaugh	Sarah	Cavanaugh	3/22/2024	97202
536	jessamyn klatt	jessamyn	klatt	3/22/2024	97206
537	Aaron Rosander	Aaron	Rosander	3/22/2024	97201
538	Monica Silvestri	Monica	Silvestri	3/22/2024	97216
539	hailey cox	hailey	cox	3/22/2024	97215
540	Elizabeth Cornelius	Elizabeth	Cornelius	3/22/2024	97223
541	Dani Deshayes	Dani	Deshayes	3/22/2024	97266
542	Piper Denney	Piper	Denney	3/22/2024	97218
543	Chastidy Moser	Chastidy	Moser	3/22/2024	97124

544	Sophia Mick	Sophia	Mick	3/22/2024	97214
545	Melissa Dopierala	Melissa	Dopierala	3/22/2024	97233
546	Briauna Taylor	Briauna	Taylor	3/22/2024	97206
547	Monica Rodriguez	Monica	Rodriguez	3/22/2024	97211
548	Jennifer R Pruess	Jennifer R	Pruess	3/22/2024	97215
549	Seth Montfort	Seth	Montfort	3/22/2024	97202
550	Caitlin Galey	Caitlin	Galey	3/22/2024	97217
551	Autumn Buck	Autumn	Buck	3/22/2024	97206
552	Abbey Curtis	Abbey	Curtis	3/22/2024	97214
553	Emily LaPan	Emily	LaPan	3/22/2024	97203
554	Jacquie Hull	Jacquie	Hull	3/22/2024	97206
555	Viv Weinstein	Viv	Weinstein	3/22/2024	97210
556	Deana Kovacev	Deana	Kovacev	3/22/2024	97211
557	ANNE KILEY	ANNE	KILEY	3/22/2024	97211
558	Hayden Glass	Hayden	Glass	3/22/2024	97232
559	Maya Primich	Maya	Primich	3/22/2024	97217
560	Bee Lackner	Bee	Lackner	3/22/2024	97202
561	Airlia Oroszvary	Airlia	Oroszvary	3/22/2024	97206
562	Talia Aazami	Talia	Aazami	3/22/2024	97201
563	Robert Patterson	Robert	Patterson	3/22/2024	97206
564	Melissa Dixon	Melissa	Dixon	3/22/2024	97266
565	Dawn Dixon	Dawn	Dixon	3/22/2024	97266
566	Julie Ramos	Julie	Ramos	3/22/2024	97202
567	Roxanne Miller	Roxanne	Miller	3/22/2024	97211
568	Lisa Waters	Lisa	Waters	3/22/2024	97216
569	Emily Johnstone	Emily	Johnstone	3/22/2024	97206
570	Stefani Varney	Stefani	Varney	3/22/2024	97216
571	Jamie Aikman	Jamie	Aikman	3/22/2024	97206
572	Jana Danielson	Jana	Danielson	3/22/2024	97203
573	Rachel Lakey	Rachel	Lakey	3/22/2024	97217
574	Caitlin Quinn	Caitlin	Quinn	3/22/2024	97211
575	Sarah Rector	Sarah	Rector	3/22/2024	97212
576	Jenna Routenberg	Jenna	Routenberg	3/22/2024	97203

577	Nick Kalish	Nick	Kalish	3/22/2024	97202
578	Janna Tessman	Janna	Tessman	3/22/2024	97220
579	Kay Griffin	Kay	Griffin	3/22/2024	97215
580	Pamela Hines	Pamela	Hines	3/22/2024	97202
581	Taegen McShane	Taegen	McShane	3/22/2024	97123
582	Micharl Schultz	Micharl	Schultz	3/22/2024	97212
583	Andrew Rhodes	Andrew	Rhodes	3/22/2024	97201
584	Raquel Bucayu	Raquel	Bucayu	3/22/2024	97202
585	Jennifer Starkey	Jennifer	Starkey	3/22/2024	97217
586	Diego Ortiz	Diego	Ortiz	3/22/2024	97030
587	Caitlin Couture	Caitlin	Couture	3/22/2024	97220
588	Jamie Letourneau	Jamie	Letourneau	3/22/2024	97215
589	Whitney Bradshaw	Whitney	Bradshaw	3/22/2024	97202
590	Estela Munoz Villarreal	Estela	Munoz Villarreal	3/22/2024	97233
591	Yadira Perez	Yadira	Perez	3/22/2024	97124
592	Jonathan Thompson	Jonathan	Thompson	3/22/2024	97214
593	Morgan Cain	Morgan	Cain	3/22/2024	97202
594	Graciella Luna	Graciella	Luna	3/22/2024	97203
595	Lucas Paris	Lucas	Paris	3/22/2024	97202
596	Autumn Martinez	Autumn	Martinez	3/22/2024	97223
597	Casey Nakamura	Casey	Nakamura	3/22/2024	97202
598	Adele Rife	Adele	Rife	3/22/2024	97211
599	Ana Sofía Knutson	Ana Sofía	Knutson	3/22/2024	97206
600	shianne schimmel	shianne	schimmel	3/22/2024	97008
601	Alex OConnor	Alex	OConnor	3/22/2024	97214
602	Ali Cogan	Ali	Cogan	3/22/2024	97203
603	Kristi Willingham	Kristi	Willingham	3/22/2024	97232
604	Antonio Acuna	Antonio	Acuna	3/22/2024	97232
605	Karina Alcantara	Karina	Alcantara	3/22/2024	97201
606	Sara Ahmed	Sara	Ahmed	3/22/2024	97236
607	Terri Burnett	Terri	Burnett	3/22/2024	97022
608	Karen Tapia	Karen	Tapia	3/22/2024	97224
609	Darian Handley	Darian	Handley	3/22/2024	97267



610	Chelsea Wilkinson	Chelsea	Wilkinson	3/22/2024	97216
611	Uma Kleppinher	Uma	Kleppinher	3/22/2024	97211
612	Daniel Sartin	Daniel	Sartin	3/22/2024	97201
613	Ana Uribe	Ana	Uribe	3/22/2024	97123
614	Esther Roedel	Esther	Roedel	3/22/2024	97230
615	Jorge Bautista	Jorge	Bautista	3/22/2024	97218
616	Jennifer Bormacoff	Jennifer	Bormacoff	3/22/2024	97206
617	Nastya Kline	Nastya	Kline	3/22/2024	97202
618	Theo Kline	Theo	Kline	3/22/2024	97202
619	Nina Dabit	Nina	Dabit	3/22/2024	97209
620	AJ Waters	AJ	Waters	3/22/2024	97206
621	Shaina Hobbs	Shaina	Hobbs	3/22/2024	97214
622	Aoi Tsuda	Aoi	Tsuda	3/22/2024	97201
623	Acacia Bravo	Acacia	Bravo	3/22/2024	97202
624	Dave and Laurie King	Dave and Laurie	King	3/22/2024	97203
625	Meghan Oliva	Meghan	Oliva	3/22/2024	97217
626	Holly Ramella	Holly	Ramella	3/22/2024	97220
627	Veronica Porter	Veronica	Porter	3/22/2024	97217
628	Julien Stonewood	Julien	Stonewood	3/22/2024	97236
629	Nora Wahlund	Nora	Wahlund	3/22/2024	97206
630	Alondra Garcia	Alondra	Garcia	3/22/2024	97229
631	Elizabeth Hing	Elizabeth	Hing	3/22/2024	97219
632	Olivia Smith	Olivia	Smith	3/22/2024	97217
633	Ruby Trujillo	Ruby	Trujillo	3/22/2024	97603
634	Erin Barta	Erin	Barta	3/22/2024	97213
635	Anne Luttrell	Anne	Luttrell	3/22/2024	97210
636	Delaney Pearson	Delaney	Pearson	3/22/2024	97222
637	Annie Murrell	Annie	Murrell	3/22/2024	97210
638	Landon Hawkins	Landon	Hawkins	3/22/2024	97202
639	Allie Orton	Allie	Orton	3/22/2024	97225
640	Hailie Lopez	Hailie	Lopez	3/22/2024	97005
641	Gail Jones	Gail	Jones	3/22/2024	97214
642	Alexis Weaver	Alexis	Weaver	3/22/2024	97214

643	Lana walling	Lana	walling	3/22/2024	97210
644	Molly Christison	Molly	Christison	3/22/2024	97206
645	Elle Biesemeyer	Elle	Biesemeyer	3/22/2024	97231
646	Leonardo Tarango	Leonardo	Tarango	3/22/2024	97202
647	Victoria Royal	Victoria	Royal	3/22/2024	97232
648	Kit Adams	Kit	Adams	3/22/2024	97216
649	Tiffany Sackett	Tiffany	Sackett	3/22/2024	97227
650	Kathleen Rodriguez	Kathleen	Rodriguez	3/22/2024	97202
651	Max Camille	Max	Camille	3/22/2024	97002
652	sophia velles	sophia	velles	3/22/2024	97218
653	Francisca Garfia	Francisca	Garfia	3/22/2024	97215
654	Dylan Thelen	Dylan	Thelen	3/22/2024	97202
655	Rachel Lam	Rachel	Lam	3/22/2024	97124
656	Antonio Anderson	Antonio	Anderson	3/22/2024	97214
657	Kara Traffas	Kara	Traffas	3/22/2024	97062
658	Elyssa Henry	Elyssa	Henry	3/22/2024	97301
659	Valerie Fabiano	Valerie	Fabiano	3/22/2024	97221
660	Rachel Tanzer	Rachel	Tanzer	3/22/2024	97206
661	Ana Gonzalez	Ana	Gonzalez	3/22/2024	97123
662	Massimiliano Bruschi	Massimiliano	Bruschi	3/22/2024	97206
663	Rahul Gautam	Rahul	Gautam	3/22/2024	97201
664	Daniel Kimble	Daniel	Kimble	3/22/2024	97209
665	Kayla Kirk	Kayla	Kirk	3/22/2024	97202
666	Nathan Weinbaum	Nathan	Weinbaum	3/22/2024	97206
667	Kevin Rhodes	Kevin	Rhodes	3/22/2024	97213
668	Carolina Ruiz	Carolina	Ruiz	3/22/2024	97225
669	Stephanie Carmona	Stephanie	Carmona	3/22/2024	97317
670	Theo Spain	Theo	Spain	3/22/2024	97203
671	RT Tougas	RT	Tougas	3/22/2024	97213
672	Mckenna Neale	Mckenna	Neale	3/22/2024	97203
673	Heather Jamieson	Heather	Jamieson	3/22/2024	97223
674	Megan Chambers	Megan	Chambers	3/22/2024	97267
675	Rachel Stehly	Rachel	Stehly	3/22/2024	97214

676	Julie Toporowski	Julie	Toporowski	3/22/2024	97267
677	Katherine McGuiness	Katherine	McGuiness	3/22/2024	97206
678	James Gorsline	James	Gorsline	3/22/2024	97225
679	Amber Taniuchi	Amber	Taniuchi	3/22/2024	97216
680	Christian Jahn	Christian	Jahn	3/22/2024	97217
681	Rebecca Price	Rebecca	Price	3/22/2024	97236
682	Abigail Sastre	Abigail	Sastre	3/22/2024	97080
683	Morgan Gallardo	Morgan	Gallardo	3/22/2024	97267
684	Maria Hernandez	Maria	Hernandez	3/22/2024	97236
685	Jen Gentry	Jen	Gentry	3/22/2024	97005
686	Taylor Lee	Taylor	Lee	3/22/2024	97217
687	Lilly Hoang	Lilly	Hoang	3/22/2024	97007
688	Toni Cox	Toni	Cox	3/22/2024	97214
689	libby alfieri	libby	alfieri	3/22/2024	97202
690	Janey Thogmartin	Janey	Thogmartin	3/22/2024	97202
691	Kyland Holmes	Kyland	Holmes	3/22/2024	97217
692	Heather Birdsong	Heather	Birdsong	3/22/2024	97210
693	Guadalupe Harris	Guadalupe	Harris	3/22/2024	97008
694	Selena Breazile	Selena	Breazile	3/22/2024	97080
695	Serina Woods	Serina	Woods	3/22/2024	97215
696	RC Feliz	RC	Feliz	3/22/2024	97123
697	Eddie Amans	Eddie	Amans	3/22/2024	97213
698	Tessa Jaqua	Tessa	Jaqua	3/22/2024	97230
699	Nicole Steele	Nicole	Steele	3/22/2024	97206
700	Lydia Vogel	Lydia	Vogel	3/22/2024	97124
701	Angela Aasen	Angela	Aasen	3/22/2024	97132
702	Milana Grant	Milana	Grant	3/22/2024	97212
703	Cindy Phillips	Cindy	Phillips	3/22/2024	97202
704	Kat Curtis	Kat	Curtis	3/22/2024	97202
705	Opal Rose	Opal	Rose	3/22/2024	97222
706	Brian McCauley	Brian	McCauley	3/22/2024	97230
707	Jesse Yelvington	Jesse	Yelvington	3/22/2024	97123
708	Jordan Smith	Jordan	Smith	3/22/2024	97203

709	Karen Martwick	Karen	Martwick	3/22/2024	97215
710	Aleem Bhopal	Aleem	Bhopal	3/22/2024	97015
711	Jeff Truhn	Jeff	Truhn	3/22/2024	97267
712	Amberlee Dykstra	Amberlee	Dykstra	3/22/2024	97202
713	Virsha Carter	Virsha	Carter	3/23/2024	97002
714	Keeley Koch	Keeley	Koch	3/23/2024	97219
715	Inga Fisher Williams	Inga	Fisher Williams	3/27/2024	97239
716	Judith Aftergut	Judith	Aftergut	4/1/2024	97221
717	Mike LaPorte	Mike	LaPorte	4/1/2024	97223
718	Nancy Hedrick	Nancy	Hedrick	3/27/2024	97217
719	David Kay	David	Kay	4/1/2024	97236
720	Dianne Ensign	Dianne	Ensign	3/27/2024	97219
721	Donna Steadman	Donna	Steadman	4/3/2024	97224
722	Ed Miska	Ed	Miska	4/1/2024	97068
723	JoAnne Knowles	JoAnne	Knowles	4/2/2024	97202
724	John Nettleton	John	Nettleton	4/1/2024	97202
725	Mariea Gill	Mariea	Gill	4/1/2024	97501
726	Matthew Gray	Matthew	Gray	4/1/2024	97330
727	Melissa Hathaway	Melissa	Hathaway	4/3/2024	97230
728	dell goldsmith	dell	goldsmith	4/1/2024	97225
729	dell goldsmith	dell	goldsmith	3/28/2024	97225
730	Margaret Heydon	Margaret	Heydon	4/2/2024	97230
731	Margaret Heydon	Margaret	Heydon	4/1/2024	97230
732	Priscilla Lane	Priscilla	Lane	4/1/2024	97215
733	Barbara Troxel	Barbara	Troxel	4/1/2024	97030
734	Barbara Troxel	Barbara	Troxel	3/23/2024	97030
735	William Obrien	William	Obrien	4/2/2024	98685
736	Melba Dlugonski	Melba	Dlugonski	3/28/2024	97206
737	Pat DeLaquil	Pat	DeLaquil	3/29/2024	97080
738	Ann Turner	Ann	Turner	3/28/2024	97211
739	David Riney	David	Riney	3/25/2024	97280
740	Jean Lofy	Jean	Lofy	3/28/2024	97222
741	Joan Bradley	Joan	Bradley	4/2/2024	97206

742	David Potts	David	Potts	4/1/2024	97113
743	Susan Heath	Susan	Heath	3/27/2024	97322
744	Jessi Presley-Grusin	Jessi	Presley-Grusin	3/23/2024	97232
745	Jessi Presley-Grusin	Jessi	Presley-Grusin	3/23/2024	97232
746	Larry De Young	Larry	De Young	4/1/2024	97321
747	Carey Lee	Carey	Lee	3/29/2024	97302
748	John Livingston	John	Livingston	3/28/2024	97306
749	John Livingston	John	Livingston	4/4/2024	97306
750	Jenifer Schramm	Jenifer	Schramm	3/27/2024	97210
751	Veronica Poklemba	Veronica	Poklemba	3/28/2024	97202
752	Brad Reed	Brad	Reed	4/1/2024	97222
753	Corina Ferguson	Corina	Ferguson	4/2/2024	97266
754	Susan Richardson	Susan	Richardson	3/24/2024	97080
755	garry smith	garry	smith	4/3/2024	97383
756	Patricia Jacobson	Patricia	Jacobson	4/2/2024	97070
757	Gaynell Schenck	Gaynell	Schenck	4/2/2024	97209
758	Rick Silverman	Rick	Silverman	4/1/2024	97239
759	Britney VanCitters	Britney	VanCitters	3/25/2024	97266
760	Britney VanCitters	Britney	VanCitters	3/25/2024	97266
761	Taylor Vickers	Taylor	Vickers	3/24/2024	97205
762	rachel Mulder	rachel	Mulder	3/23/2024	97202
763	Caitlin Quinn	Caitlin	Quinn	4/3/2024	97211
764	Amanda Blum	Amanda	Blum	3/23/2024	97206
765	Skye Warding	Skye	Warding	3/23/2024	97217
766	Jacob Tqylor	Jacob	Tqylor	3/23/2024	97217
767	Peren Tiemann	Peren	Tiemann	3/23/2024	97034
768	Nathalia Case	Nathalia	Case	3/23/2024	97230
769	Angel Ortega	Angel	Ortega	3/23/2024	97266
770	Ashley Chan	Ashley	Chan	3/23/2024	97202
771	Sophia Crawford	Sophia	Crawford	3/23/2024	97223
772	Kym Condron-Lee	Kym	Condron-Lee	3/23/2024	97215
773	Annie Veatch	Annie	Veatch	3/23/2024	97007
774	Tadeo Miller-Castro	Tadeo	Miller-Castro	3/23/2024	97215

775	Sydney Morrisson	Sydney	Morrisson	3/23/2024	97201
776	Stacy Richards	Stacy	Richards	3/23/2024	97211
777	Anna-Lisa Pillay	Anna-Lisa	Pillay	3/23/2024	97471
778	Light Ray	Light	Ray	3/23/2024	97301
779	Olivia Cutler	Olivia	Cutler	3/23/2024	97217
780	Susan Moray	Susan	Moray	3/23/2024	97214
781	julie reardon	julie	reardon	3/23/2024	97213
782	Adam Kirkby	Adam	Kirkby	3/23/2024	97124
783	Brian McKenzie	Brian	McKenzie	3/23/2024	97266
784	Anayeli Diaz-Espinosa	Anayeli	Diaz-Espinosa	3/23/2024	97206
785	Ray Ferro	Ray	Ferro	3/23/2024	97232
786	Raquel Barajas	Raquel	Barajas	3/23/2024	97214
787	Alexandra Slotterback	Alexandra	Slotterback	3/23/2024	97219
788	Cameron Gilbert	Cameron	Gilbert	3/23/2024	97266
789	Dara Hanley	Dara	Hanley	3/23/2024	97223
790	Andrea Rubio	Andrea	Rubio	3/23/2024	97217
791	Laura Helms	Laura	Helms	3/23/2024	97213
792	Mariah Garcia	Mariah	Garcia	3/23/2024	97209
793	Kim Wilson	Kim	Wilson	3/23/2024	97211
794	Bob Johnson	Bob	Johnson	3/23/2024	97202
795	Natalie Bradshaw	Natalie	Bradshaw	3/23/2024	97202
796	Natalie Athay	Natalie	Athay	3/23/2024	97206
797	Nancy Ramirez	Nancy	Ramirez	3/23/2024	97225
798	Gabrielle Hendricks	Gabrielle	Hendricks	3/23/2024	97202
799	Emma Callender	Emma	Callender	3/23/2024	97217
800	Jessica McBride	Jessica	McBride	3/23/2024	97008
801	Chris bullard	Chris	bullard	3/23/2024	97217
802	Katya Manges	Katya	Manges	3/23/2024	97214
803	Meg Bender-Stephanski	Meg	Bender-Stephanski	3/23/2024	97214
804	Sara Alcid	Sara	Alcid	3/23/2024	97217
805	Vanessa Bazzani	Vanessa	Bazzani	3/23/2024	97222
806	Amelia ONeil	Amelia	ONeil	3/23/2024	97211
807	Emma Fortmiller	Emma	Fortmiller	3/23/2024	97223

808	Faith Martinmaas	Faith	Martinmaas	3/23/2024	97221
809	Tara Horn	Tara	Horn	3/23/2024	97211
810	Melissa Nethercott	Melissa	Nethercott	3/23/2024	97206
811	Hannah Spencer	Hannah	Spencer	3/23/2024	97214
812	Harley Hurd	Harley	Hurd	3/23/2024	97062
813	Hollowood Sarah	Hollowood	Sarah	3/23/2024	97213
814	Kayla carlson	Kayla	carlson	3/23/2024	97213
815	Jacqui Clauson	Jacqui	Clauson	3/23/2024	97045
816	Stefanie Hatcher	Stefanie	Hatcher	3/23/2024	97232
817	Kylie Hyde	Kylie	Hyde	3/23/2024	97206
818	Kyle Macadam	Kyle	Macadam	3/23/2024	97224
819	Katie Brown	Katie	Brown	3/23/2024	97214
820	Emily Konkel	Emily	Konkel	3/23/2024	97206
821	Amber J Garrett	Amber J	Garrett	3/23/2024	97317
822	Dashiell Hock	Dashiell	Hock	3/23/2024	97203
823	Tera Hurst	Tera	Hurst	3/23/2024	97215
824	Dani Robinson	Dani	Robinson	3/23/2024	97006
825	Chris Tiemann	Chris	Tiemann	3/23/2024	97034
826	Veranda De La Torre	Veranda	De La Torre	3/23/2024	97216
827	Tahirah Memory	Tahirah	Memory	3/23/2024	97003
828	Lauren Kung	Lauren	Kung	3/23/2024	97266
829	Soukxay Malavong	Soukxay	Malavong	3/23/2024	97078
830	Samuel Diaz	Samuel	Diaz	3/23/2024	97203
831	Kaleigh Schmidt	Kaleigh	Schmidt	3/23/2024	97236
832	Sophie Wiatr	Sophie	Wiatr	3/23/2024	97217
833	Diana Oropeza	Diana	Oropeza	3/23/2024	97211
834	Tessa Jacobson	Tessa	Jacobson	3/23/2024	97217
835	justina smith	justina	smith	3/23/2024	97229
836	Rowan Gibson	Rowan	Gibson	3/23/2024	97213
837	Megan Wiebe	Megan	Wiebe	3/23/2024	97239
838	Rissa Ochs	Rissa	Ochs	3/23/2024	97266
839	Annie Dillon	Annie	Dillon	3/23/2024	97217
840	Madisen Keikkala	Madisen	Keikkala	3/23/2024	97205

841	Samantha Cimino	Samantha	Cimino	3/23/2024	97214
842	Elliott Dutcher	Elliott	Dutcher	3/23/2024	97201
843	Justin Thorpe	Justin	Thorpe	3/23/2024	97213
844	Elaine Li	Elaine	Li	3/23/2024	97215
845	Russell Cornell	Russell	Cornell	3/23/2024	97223
846	Michaela Moran	Michaela	Moran	3/23/2024	97233
847	Esteban Acosta	Esteban	Acosta	3/23/2024	97123
848	Chloe Abarbanel	Chloe	Abarbanel	3/23/2024	97206
849	Nick Mediati	Nick	Mediati	3/23/2024	97203
850	Mitzi Guzman	Mitzi	Guzman	3/23/2024	97214
851	Kaylee Brunette	Kaylee	Brunette	3/23/2024	97214
852	Madeline Cooper	Madeline	Cooper	3/23/2024	97232
853	Michelle Krause	Michelle	Krause	3/23/2024	97206
854	Whit Lock	Whit	Lock	3/23/2024	97220
855	elizabeth Brunner	elizabeth	Brunner	3/23/2024	97202
856	Anthony Castaneda	Anthony	Castaneda	3/23/2024	97232
857	kai neuenschwander	kai	neuenschwander	3/23/2024	97232
858	Shannon Wolf	Shannon	Wolf	3/23/2024	97212
859	Emily Sleadd	Emily	Sleadd	3/23/2024	97214
860	Samantha Erickson	Samantha	Erickson	3/23/2024	97214
861	Michelle Apalategui	Michelle	Apalategui	3/23/2024	97222
862	Bailey Mayfield	Bailey	Mayfield	3/23/2024	97220
863	Kaylie crisen	Kaylie	crisen	3/23/2024	97202
864	vignette fleur	vignette	fleur	3/23/2024	97214
865	Shanna Vincent	Shanna	Vincent	3/23/2024	97214
866	Elizabeth Strewler	Elizabeth	Strewler	3/23/2024	97206
867	Coral Cloutman	Coral	Cloutman	3/23/2024	97212
868	Han Divine	Han	Divine	3/23/2024	97215
869	John Hudson	John	Hudson	3/23/2024	97216
870	Makenzie Wimer	Makenzie	Wimer	3/23/2024	98684
871	Jacob Gray	Jacob	Gray	3/23/2024	97206
872	Taz Coffey	Taz	Coffey	3/23/2024	97202
873	Jacob Harwood	Jacob	Harwood	3/23/2024	97211



874	Ananda Gordon-Peabody	Ananda	Gordon-Peabody	3/23/2024	97217
875	Kara Obuchowski	Kara	Obuchowski	3/23/2024	97217
876	Sarah Dyckman	Sarah	Dyckman	3/23/2024	97302
877	Janet Lackey	Janet	Lackey	3/23/2024	97206
878	makari andreotti	makari	andreotti	3/23/2024	97217
879	Marie Jacobellis	Marie	Jacobellis	3/23/2024	97214
880	Page Walters	Page	Walters	3/23/2024	97266
881	Samantha Holmes	Samantha	Holmes	3/23/2024	97212
882	Kara Hall	Kara	Hall	3/23/2024	97206
883	Christina Rixie	Christina	Rixie	3/23/2024	97124
884	Selena Contreras	Selena	Contreras	3/23/2024	97216
885	Mateo Rivera	Mateo	Rivera	3/23/2024	97304
886	Greg Huber	Greg	Huber	3/23/2024	97233
887	BJ DeHut	BJ	DeHut	3/23/2024	97213
888	adina lepp	adina	lepp	3/23/2024	97266
889	Caitlin Nolan	Caitlin	Nolan	3/23/2024	97205
890	Bird Bourgoin	Bird	Bourgoin	3/23/2024	97232
891	Stephanie M	Stephanie	M	3/23/2024	97214
892	Heidi Cronce	Heidi	Cronce	3/23/2024	97217
893	Sara Kramer	Sara	Kramer	3/23/2024	97267
894	Sara Anderson	Sara	Anderson	3/23/2024	97213
895	Phillip Runion	Phillip	Runion	3/23/2024	97211
896	Hollis Rigney	Hollis	Rigney	3/23/2024	97202
897	Lecette Burke	Lecette	Burke	3/23/2024	97214
898	Hannah Teisher	Hannah	Teisher	3/23/2024	97206
899	Annie MacAulay-Blackwell	Annie	MacAulay-Blackwell	3/23/2024	97223
900	Silas Comfortes	Silas	Comfortes	3/23/2024	97214
901	Milicent Elizabeth Coleman	Milicent Elizabeth	Coleman	3/23/2024	97214
902	Urks Kurth	Urks	Kurth	3/23/2024	97206
903	Jesse Jesse	Jesse	Jesse	3/23/2024	97212
904	Allison Rosecast	Allison	Rosecast	3/23/2024	97212
905	Kristiana Sieger	Kristiana	Sieger	3/23/2024	97214
906	Elizabeth Johnson	Elizabeth	Johnson	3/23/2024	97214

907	Katherine Alperin	Katherine	Alperin	3/23/2024	97214
908	Monica Kelsh	Monica	Kelsh	3/23/2024	97219
909	alexis taylor	alexis	taylor	3/23/2024	97217
910	Fam Saechao	Fam	Saechao	3/23/2024	97003
911	Chelsea Garrett	Chelsea	Garrett	3/23/2024	97219
912	Somaly Lam	Somaly	Lam	3/23/2024	97206
913	Melanie Rivas	Melanie	Rivas	3/23/2024	97306
914	Chandlyr Crum	Chandlyr	Crum	3/23/2024	97202
915	Mckenzie Baker	Mckenzie	Baker	3/23/2024	98672
916	Morgan Christy	Morgan	Christy	3/23/2024	97202
917	Kaia Dresselhaus	Kaia	Dresselhaus	3/23/2024	97206
918	Clarissa Rivas	Clarissa	Rivas	3/23/2024	95060
919	Tessa Urbanovich	Tessa	Urbanovich	3/23/2024	97222
920	Grace Boyd	Grace	Boyd	3/23/2024	97214
921	Jimi Hendrix	Jimi	Hendrix	3/23/2024	97206
922	Haley Love	Haley	Love	3/24/2024	97230
923	Oskar Kimball	Oskar	Kimball	3/24/2024	97209
924	Avery Morris	Avery	Morris	3/24/2024	97209
925	Natalie Taylor	Natalie	Taylor	3/24/2024	97214
926	Kathryn Lindstrom	Kathryn	Lindstrom	3/24/2024	97202
927	Alyssa Webster	Alyssa	Webster	3/24/2024	97214
928	Angela Diamond	Angela	Diamond	3/24/2024	97217
929	Jackie Westfall	Jackie	Westfall	3/24/2024	97214
930	Megan Clouser	Megan	Clouser	3/24/2024	97219
931	Kayla Larson	Kayla	Larson	3/24/2024	97211
932	Jhoselyn de la Garza	Jhoselyn	de la Garza	3/24/2024	97206
933	nicole radlauer	nicole	radlauer	3/24/2024	97232
934	Molly Reed	Molly	Reed	3/24/2024	97214
935	Kayla Rodriguez	Kayla	Rodriguez	3/24/2024	97202
936	Alyssa Fredrick	Alyssa	Fredrick	3/24/2024	97221
937	Sabrina Navarro	Sabrina	Navarro	3/24/2024	97232
938	Amanda O'Neill	Amanda	O'Neill	3/24/2024	97215
939	Payton Swegel	Payton	Swegel	3/24/2024	97202

940	Taylor Wilson	Taylor	Wilson	3/24/2024	97209
941	Kathleen Huynh	Kathleen	Huynh	3/24/2024	97206
942	Andrew Essig	Andrew	Essig	3/24/2024	97266
943	Laura Livingston	Laura	Livingston	3/24/2024	97209
944	Rachel Amaro	Rachel	Amaro	3/24/2024	97206
945	Jessie Rainwater-Hilbrands	Jessie	Rainwater-Hilbrands	3/24/2024	97045
946	Samantha Galan	Samantha	Galan	3/24/2024	97202
947	Megan Strauss	Megan	Strauss	3/24/2024	97030
948	Marlena Mirho	Marlena	Mirho	3/24/2024	97333
949	Erica Csuy	Erica	Csuy	3/24/2024	97230
950	Ariel Doggett	Ariel	Doggett	3/24/2024	97239
951	Audrey Belisle	Audrey	Belisle	3/24/2024	97219
952	Skye McLaren Walton	Skye	McLaren Walton	3/24/2024	97239
953	Sarah Cadwell	Sarah	Cadwell	3/24/2024	97202
954	Brandy Balicanta	Brandy	Balicanta	3/24/2024	97202
955	Kathren Moss	Kathren	Moss	3/24/2024	97215
956	Catheryn Apsey	Catheryn	Apsey	3/24/2024	97206
957	Justin Toledo	Justin	Toledo	3/24/2024	97206
958	Kara Anne	Kara	Anne	3/24/2024	97239
959	Sarah Schaberg	Sarah	Schaberg	3/24/2024	97236
960	Syann Lunsford	Syann	Lunsford	3/24/2024	97212
961	Britney Gregerson-kaplan	Britney	Gregerson-kaplan	3/24/2024	97206
962	Parker Sczepanik	Parker	Sczepanik	3/24/2024	97203
963	Taylor Wood	Taylor	Wood	3/24/2024	97206
964	Ele Morningstar	Ele	Morningstar	3/24/2024	97229
965	Kirsten Ray	Kirsten	Ray	3/24/2024	97220
966	Kiana Slabaugh	Kiana	Slabaugh	3/24/2024	97206
967	Peter McLean	Peter	McLean	3/24/2024	97233
968	Jessica Hopkins-Hubbard	Jessica	Hopkins-Hubbard	3/24/2024	97132
969	Austin Bowmin	Austin	Bowmin	3/24/2024	97206
970	Sarah Dunn	Sarah	Dunn	3/24/2024	97232
971	Nicolle Clemetson	Nicolle	Clemetson	3/24/2024	97231
972	Kat Audick	Kat	Audick	3/24/2024	97211

973	U Nuffer-Rod	U	Nuffer-Rod	3/24/2024	97211
974	Renee Pleho	Renee	Pleho	3/24/2024	97206
975	Jesii Dee	Jesii	Dee	3/24/2024	97216
976	Oliver Daofu	Oliver	Daofu	3/24/2024	97206
977	Isis Fisher	Isis	Fisher	3/24/2024	97227
978	Jacob Foulk	Jacob	Foulk	3/24/2024	97201
979	Blake Tupman	Blake	Tupman	3/24/2024	97217
980	Elizabeth Neal	Elizabeth	Neal	3/24/2024	97213
981	Olivia Dennis	Olivia	Dennis	3/24/2024	97233
982	Paige Guthrie	Paige	Guthrie	3/24/2024	97202
983	Ira Leigh	Ira	Leigh	3/24/2024	97211
984	Erica Kimsey	Erica	Kimsey	3/24/2024	97015
985	Scott Landia	Scott	Landia	3/24/2024	97219
986	Jennifer Danneman	Jennifer	Danneman	3/24/2024	97233
987	Sierra Lyons	Sierra	Lyons	3/24/2024	97030
988	Allison Bernaldez	Allison	Bernaldez	3/24/2024	97008
989	Kimberly Tucker	Kimberly	Tucker	3/24/2024	97233
990	Anna Schwartz	Anna	Schwartz	3/24/2024	97213
991	emma cooper	emma	cooper	3/24/2024	97202
992	Kennan Weekley	Kennan	Weekley	3/24/2024	97227
993	Annalise Servin	Annalise	Servin	3/24/2024	97229
994	Genevieve Castle	Genevieve	Castle	3/24/2024	97214
995	Ashlee Montano	Ashlee	Montano	3/24/2024	97215
996	Jorian Guard	Jorian	Guard	3/24/2024	97213
997	Riley Chubb	Riley	Chubb	3/24/2024	97206
998	madalene bynon	madalene	bynon	3/24/2024	97006
999	Dimitri Ward	Dimitri	Ward	3/24/2024	97239
1000	Mali Fischer-Levine	Mali	Fischer-Levine	3/24/2024	97216
1001	Cam Babcock	Cam	Babcock	3/24/2024	97206
1002	Haley blasdell	Haley	blasdell	3/24/2024	97030
1003	Tore James	Tore	James	3/24/2024	97230
1004	Alex Vine	Alex	Vine	3/24/2024	97236
1005	Fox Mathis	Fox	Mathis	3/24/2024	97236

1006	Kari Greene	Kari	Greene	3/24/2024	97230
1007	Julian Mull	Julian	Mull	3/24/2024	97206
1008	Anna Schneider	Anna	Schneider	3/24/2024	97214
1009	Lauren Tilton	Lauren	Tilton	3/24/2024	97227
1010	Mara Beitzel	Mara	Beitzel	3/24/2024	97233
1011	MacKenzie Kessler	MacKenzie	Kessler	3/24/2024	97216
1012	Aaron Lange	Aaron	Lange	3/24/2024	97080
1013	Andrea Smith	Andrea	Smith	3/24/2024	97233
1014	Spencer Voris	Spencer	Voris	3/24/2024	97211
1015	Connor Pemberton	Connor	Pemberton	3/24/2024	97302
1016	Rebecca Stuebe	Rebecca	Stuebe	3/24/2024	97203
1017	Andre Miller	Andre	Miller	3/24/2024	97030
1018	skyye d'allyn	skyye	d'allyn	3/24/2024	97201
1019	Jesse Bonfiglio	Jesse	Bonfiglio	3/24/2024	97203
1020	Shweta Krishnan	Shweta	Krishnan	3/24/2024	97229
1021	Kelsey Huber	Kelsey	Huber	3/24/2024	97203
1022	Hayley Valoppi	Hayley	Valoppi	3/24/2024	97202
1023	Lily Paivarinta	Lily	Paivarinta	3/24/2024	97214
1024	Mary Embree	Mary	Embree	3/24/2024	97232
1025	Alexandra moskow	Alexandra	moskow	3/24/2024	97214
1026	Nita Shah	Nita	Shah	3/24/2024	97229
1027	Hannah Brown	Hannah	Brown	3/24/2024	97027
1028	Katrina Doughty	Katrina	Doughty	3/25/2024	97233
1029	grace katzke	grace	katzke	3/25/2024	97008
1030	Matthew Anderson	Matthew	Anderson	3/25/2024	97215
1031	Camerina Galvan	Camerina	Galvan	3/25/2024	97267
1032	Sara Robison	Sara	Robison	3/25/2024	97223
1033	Emily Johnson	Emily	Johnson	3/25/2024	97330
1034	Willy PuiHang Wong	Willy PuiHang	Wong	3/25/2024	97230
1035	Dan Nguyen	Dan	Nguyen	3/25/2024	97015
1036	emily nadel	emily	nadel	3/25/2024	97045
1037	Deborah Boncutter	Deborah	Boncutter	3/25/2024	97219
1038	Caroline Phillips	Caroline	Phillips	3/25/2024	97214

1039	Elliot Rivera	Elliot	Rivera	3/25/2024	97202
1040	Madison Klementyn	Madison	Klementyn	3/25/2024	97219
1041	Lucifer Horner	Lucifer	Horner	3/25/2024	97202
1042	Kay Stewart	Kay	Stewart	3/25/2024	97202
1043	Summer Ciorlieri	Summer	Ciorlieri	3/25/2024	97225
1044	Kai Doney	Kai	Doney	3/25/2024	97214
1045	Bianca Chavez	Bianca	Chavez	3/25/2024	97210
1046	Andrew Jackson	Andrew	Jackson	3/25/2024	97239
1047	Ariadna Falcon Gonzalez	Ariadna	Falcon Gonzalez	3/25/2024	97209
1048	Ben Scott	Ben	Scott	3/25/2024	97206
1049	Elena Beitzel	Elena	Beitzel	3/25/2024	97035
1050	Cameron Brown	Cameron	Brown	3/25/2024	97210
1051	Alicia Plate	Alicia	Plate	3/25/2024	97217
1052	Joon Ae Haworth-Kaufka	Joon Ae	Haworth-Kaufka	3/26/2024	97213
1053	Rachel Philips	Rachel	Philips	3/26/2024	97206
1054	Lana Laren Wall	Lana Laren	Wall	3/26/2024	97266
1055	Jasper Trotter	Jasper	Trotter	3/26/2024	97214
1056	MLynn Suwinski	MLynn	Suwinski	3/26/2024	97209
1057	Amy Ruff	Amy	Ruff	3/26/2024	97202
1058	River Jackson	River	Jackson	3/26/2024	97202
1059	mercury baxley	mercury	baxley	3/27/2024	97232
1060	Emily Paben	Emily	Paben	3/27/2024	97035
1061	Carrie Matthews	Carrie	Matthews	3/27/2024	97232
1062	Sarah Medley	Sarah	Medley	3/27/2024	97209
1063	Caitlyn Whitcomb	Caitlyn	Whitcomb	3/27/2024	97230
1064	Rand Schenck	Rand	Schenck	3/27/2024	97212
1065	Taran Nadler	Taran	Nadler	3/27/2024	97206
1066	Art Okada	Art	Okada	3/27/2024	97219
1067	Howard Shapiro	Howard	Shapiro	3/27/2024	97201
1068	KB Mercer	KB	Mercer	3/27/2024	97266
1069	Judy Ringenson	Judy	Ringenson	3/27/2024	97214
1070	Timothy Dahl	Timothy	Dahl	3/27/2024	97045
1071	Marian Dixon	Marian	Dixon	3/27/2024	97206

1072	Judy Arielle Fiestal	Judy Arielle	Fiestal	3/27/2024	97214
1073	Leslie Pohl-Kosbau	Leslie	Pohl-Kosbau	3/27/2024	97219
1074	Margaret Bowman	Margaret	Bowman	3/27/2024	97212
1075	Joe Walicki	Joe	Walicki	3/27/2024	97302
1076	Pattie Sloan	Pattie	Sloan	3/27/2024	97304
1077	Kevin Levy	Kevin	Levy	3/27/2024	97215
1078	Emily Polanshek	Emily	Polanshek	3/27/2024	97219
1079	Maggie Stock	Maggie	Stock	3/27/2024	97223
1080	Shelby Frost-Williams	Shelby	Frost-Williams	3/27/2024	97202
1081	Maggie Podesta	Maggie	Podesta	3/27/2024	97213
1082	Nanci Champlin	Nanci	Champlin	3/27/2024	97202
1083	Mark Puhlman	Mark	Puhlman	3/27/2024	97034
1084	Iris Godfrey	Iris	Godfrey	3/27/2024	97106
1085	Paula Yocum	Paula	Yocum	3/27/2024	97216
1086	John F Christensen	John F	Christensen	3/27/2024	97019
1087	Rick Ray	Rick	Ray	3/27/2024	97060
1088	Isamar Aguirre	Isamar	Aguirre	3/27/2024	97317
1089	Carlyn Mitas	Carlyn	Mitas	3/27/2024	97019
1090	Joseph Stenger	Joseph	Stenger	3/27/2024	97211
1091	Klaus Heyne	Klaus	Heyne	3/27/2024	97019
1092	William Heerd	William	Heerd	3/27/2024	97267
1093	Kathleen Shelman	Kathleen	Shelman	3/27/2024	97019
1094	Jackson Winkler	Jackson	Winkler	3/27/2024	97078
1095	Samantha Aleo	Samantha	Aleo	3/27/2024	97214
1096	Maggie Barton	Maggie	Barton	3/27/2024	97217
1097	Joana Kirchhoff	Joana	Kirchhoff	3/27/2024	97213
1098	Jenni Bowker	Jenni	Bowker	3/27/2024	97045
1099	Christina Davis	Christina	Davis	3/27/2024	97019
1100	Fritz MITAS	Fritz	MITAS	3/27/2024	97019
1101	Duane Fickeisen	Duane	Fickeisen	3/27/2024	97215
1102	Joshua Pfaendler	Joshua	Pfaendler	3/27/2024	97221
1103	Erica C	Erica	C	3/27/2024	97203
1104	Jennifer Pratt	Jennifer	Pratt	3/27/2024	97019

1105	Karen Harrington	Karen	Harrington	3/27/2024	97068
1106	Iris Chilton	Iris	Chilton	3/27/2024	97266
1107	Leah Fredericks	Leah	Fredericks	3/27/2024	97019
1108	Brenda Peltier	Brenda	Peltier	3/28/2024	97019
1109	Susan Watt	Susan	Watt	3/28/2024	97203
1110	Alexis Burke	Alexis	Burke	3/28/2024	97127
1111	Christopher Booth	Christopher	Booth	3/28/2024	97229
1112	ALICIA KAVON	ALICIA	KAVON	3/28/2024	97202
1113	Lucia Henry	Lucia	Henry	3/28/2024	97206
1114	desiree taylor	desiree	taylor	3/28/2024	97214
1115	Sampson Taylor	Sampson	Taylor	3/28/2024	97030
1116	Cecelia Lente	Cecelia	Lente	3/28/2024	97218
1117	Silas Hoffer	Silas	Hoffer	3/28/2024	97220
1118	Vawn Jason Borges	Vawn Jason	Borges	3/28/2024	97214
1119	Erin Telles	Erin	Telles	3/28/2024	97045
1120	Beatris Ramsey	Beatris	Ramsey	3/28/2024	98682
1121	Stephanie Phillips Bridges	Stephanie	Phillips Bridges	3/28/2024	97227
1122	bonz wykman	bonz	wykman	3/28/2024	97266
1123	Julia Crammond	Julia	Crammond	3/28/2024	97213
1124	Maira Navarrete	Maira	Navarrete	3/28/2024	97217
1125	Lauren Smith	Lauren	Smith	3/28/2024	97230
1126	Ramon Gordillo	Ramon	Gordillo	3/28/2024	97062
1127	Amanda Anderson	Amanda	Anderson	3/28/2024	97086
1128	Ladonna Franklin	Ladonna	Franklin	3/28/2024	97236
1129	MARLO SMITH	MARLO	SMITH	3/28/2024	97220
1130	Natasha Nichols	Natasha	Nichols	3/28/2024	97024
1131	Priscilla Mcdonald	Priscilla	Mcdonald	3/28/2024	97219
1132	Dustin Anderson	Dustin	Anderson	3/28/2024	97086
1133	Marilynne Eichinger	Marilynne	Eichinger	3/28/2024	97201
1134	Arleta White	Arleta	White	3/28/2024	97218
1135	Arleta White	Arleta	White	3/29/2024	97218
1136	Alicia Mills	Alicia	Mills	3/28/2024	97266
1137	Brittany Lampton	Brittany	Lampton	3/28/2024	97202



1138	Dayja Curry	Dayja	Curry	3/28/2024	97212
1139	Joanna Yond	Joanna	Yond	3/28/2024	97233
1140	Mrs. Heidi Wilson	Mrs. Heidi	Wilson	3/28/2024	97019
1141	Kash ONeil	Kash	ONeil	3/28/2024	97024
1142	Enrique White	Enrique	White	3/28/2024	97266
1143	Anna McClain	Anna	McClain	3/28/2024	97202
1144	Aaron Levison	Aaron	Levison	3/28/2024	97202
1145	Laura Battilega	Laura	Battilega	3/28/2024	97080
1146	Lindsay Cady	Lindsay	Cady	3/28/2024	97230
1147	A Michael Dianich	A Michael	Dianich	3/29/2024	97019
1148	Susan Weinstein	Susan	Weinstein	3/29/2024	97024
1149	Cody Chheung	Cody	Chheung	3/29/2024	97222
1150	Leslee Lewis	Leslee	Lewis	3/29/2024	97227
1151	Makayla Agnew	Makayla	Agnew	3/29/2024	97086
1152	Lemi F	Lemi	F	3/29/2024	97003
1153	Joe Worth	Joe	Worth	3/29/2024	97005
1154	William See	William	See	3/29/2024	97202
1155	jobe fallen	jobe	fallen	3/29/2024	97203
1156	Deborah Nass	Deborah	Nass	3/29/2024	97214
1157	Rodas Haile	Rodas	Haile	3/29/2024	97080
1158	Anders Meyer	Anders	Meyer	3/29/2024	97019
1159	Sasha Bartoo-Smith	Sasha	Bartoo-Smith	3/29/2024	97211
1160	Alice West	Alice	West	3/29/2024	97215
1161	meagan stein	meagan	stein	3/29/2024	97215
1162	Elaine Wong	Elaine	Wong	3/29/2024	97230
1163	Chad Halsey	Chad	Halsey	3/29/2024	97301
1164	Deana Doney	Deana	Doney	3/29/2024	97008
1165	Edwin L Mays jr	Edwin L	Mays jr	3/29/2024	97024
1166	Milo Pope	Milo	Pope	3/29/2024	97219
1167	Norinda Rodriguez	Norinda	Rodriguez	3/29/2024	97203
1168	Adelina Corro	Adelina	Corro	3/29/2024	97219
1169	claire galford	claire	galford	3/29/2024	97759
1170	Paula KRICK	Paula	KRICK	3/29/2024	97212

1171	Christy Gifford	Christy	Gifford	3/29/2024	97230
1172	Sandra Cole	Sandra	Cole	3/29/2024	97220
1173	Anita Bartholomew	Anita	Bartholomew	3/29/2024	97267
1174	Ray Batch	Ray	Batch	3/29/2024	97035
1175	Chuck Wells	Chuck	Wells	3/29/2024	97266
1176	Lyle Funderburk	Lyle	Funderburk	3/29/2024	97266
1177	Lyle Funderburk	Lyle	Funderburk	3/29/2024	97266
1178	Judy Ebner	Judy	Ebner	3/29/2024	97206
1179	Mauria McClay	Mauria	McClay	3/29/2024	97203
1180	PAUL CREE	PAUL	CREE	3/29/2024	97223
1181	Gabriella Ali	Gabriella	Ali	3/29/2024	97217
1182	Kate Roberts	Kate	Roberts	3/29/2024	97217
1183	Peter Hope	Peter	Hope	3/29/2024	97229
1184	Roxanne Dalton	Roxanne	Dalton	3/29/2024	97224
1185	Rasha Morcos	Rasha	Morcos	3/29/2024	97266
1186	M. Andre	M.	Andre	3/29/2024	97202
1187	Lena Karam	Lena	Karam	3/29/2024	97215
1188	LENNY WALDEN	LENNY	WALDEN	3/29/2024	97267
1189	Susan Johnson	Susan	Johnson	3/29/2024	97236
1190	Jody Garhart	Jody	Garhart	3/29/2024	97123
1191	Joseph Jasmer	Joseph	Jasmer	3/29/2024	97301
1192	Eric Tschuy	Eric	Tschuy	3/29/2024	97216
1193	Linda Nelson	Linda	Nelson	3/29/2024	97201
1194	Gail Sanford	Gail	Sanford	3/29/2024	97267
1195	Gail LaMontagne	Gail	LaMontagne	3/30/2024	97267
1196	Karen Leon	Karen	Leon	3/30/2024	97203
1197	Vicki Arnold	Vicki	Arnold	3/30/2024	97080
1198	GEORGE PORTWOOD	GEORGE	PORTWOOD	3/30/2024	97267
1199	Kristin Guest	Kristin	Guest	3/30/2024	97232
1200	Von Thiel	Von	Thiel	3/30/2024	97132
1201	Margarita Villalobos	Margarita	Villalobos	3/30/2024	97060
1202	Holly Daigle	Holly	Daigle	3/30/2024	97211
1203	Jake Mcconnell jr	Jake	Mcconnell jr	3/30/2024	97230

1204	Bill Harris	Bill	Harris	3/30/2024	97210
1205	Emala Schlaman	Emala	Schlaman	3/30/2024	97045
1206	alicia venegas	alicia	venegas	3/31/2024	97233
1207	Dan Gattman	Dan	Gattman	3/31/2024	97027
1208	Carri Mae Wall	Carri Mae	Wall	3/31/2024	97214
1209	Tracie Davis	Tracie	Davis	3/31/2024	97206
1210	Havala Hanson	Havala	Hanson	3/31/2024	97007
1211	Darleen Bernal	Darleen	Bernal	3/31/2024	97267
1212	Kari Taylor	Kari	Taylor	4/1/2024	97206
1213	Brod Salo	Brod	Salo	4/1/2024	97266
1214	JaKarra Sanders	JaKarra	Sanders	4/1/2024	97027
1215	Malinda Winsor	Malinda	Winsor	4/1/2024	97222
1216	Melinda Hickey	Melinda	Hickey	4/1/2024	97015
1217	Scott Carpenter	Scott	Carpenter	4/1/2024	97225
1218	Bonnie Sanchez	Bonnie	Sanchez	4/1/2024	97027
1219	Donovan James	Donovan	James	4/1/2024	97266
1220	Tyler Welch	Tyler	Welch	4/1/2024	97216
1221	Janet Unruh	Janet	Unruh	4/1/2024	97230
1222	Theodore Fry	Theodore	Fry	4/1/2024	97027
1223	Lois Kirk	Lois	Kirk	4/1/2024	97060
1224	Maria Velez	Maria	Velez	4/1/2024	97206
1225	Kate Wollner	Kate	Wollner	4/1/2024	97218
1226	Meily Cruz	Meily	Cruz	4/1/2024	97236
1227	Sky Callaway	Sky	Callaway	4/1/2024	97045
1228	Jennifer Rondema	Jennifer	Rondema	4/1/2024	97230
1229	Cindy Ku Jimenez	Cindy	Ku Jimenez	4/1/2024	97230
1230	Darcy Renhard	Darcy	Renhard	4/1/2024	97023
1231	leanne crosby	leanne	crosby	4/1/2024	97267
1232	S Poddar	S	Poddar	4/1/2024	97124
1233	Catha Loomis	Catha	Loomis	4/1/2024	97215
1234	Julie Remillard	Julie	Remillard	4/2/2024	97024
1235	Erick Adelman	Erick	Adelman	4/2/2024	97027
1236	Chequetta Johnson	Chequetta	Johnson	4/2/2024	97211

1237	Laura Peraza	Laura	Peraza	4/2/2024	97218
1238	Jacqueline Gonnerman	Jacqueline	Gonnerman	4/3/2024	97035
1239	Aimee Cunningham	Aimee	Cunningham	4/3/2024	97205
1240	Melissa Navarro	Melissa	Navarro	4/3/2024	97056
1241	memry smith	memry	smith	4/3/2024	97218
1242	Pat Attaway	Pat	Attaway	4/3/2024	97232
1243	Enesha Holiman	Enesha	Holiman	4/3/2024	97227
1244	Robin Adams	Robin	Adams	4/3/2024	97206
1245	Hannah Harris	Hannah	Harris	4/3/2024	97219
1246	Ivy Moore	Ivy	Moore	4/3/2024	97236
1247	Kierra Bostic	Kierra	Bostic	4/3/2024	97230
1248	Jacqueline Hale	Jacqueline	Hale	4/3/2024	97211
1249	Shayla Spencer	Shayla	Spencer	4/3/2024	97203
1250	LaNae Lawrence	LaNae	Lawrence	4/3/2024	97216
1251	Philip Berlin	Philip	Berlin	4/3/2024	97211
1252	Sherita Sanders-Smith	Sherita	Sanders-Smith	4/3/2024	97220
1253	Julie Morris	Julie	Morris	4/3/2024	97217
1254	Sossity Chiricuzio	Sossity	Chiricuzio	4/3/2024	97220
1255	Kesi Robinson	Kesi	Robinson	4/3/2024	97045
1256	Carmen Brant	Carmen	Brant	4/3/2024	97217
1257	Tianna McMullen	Tianna	McMullen	4/3/2024	97267
1258	Tierra Salmon	Tierra	Salmon	4/3/2024	97217
1259	Clarrissa Thompson	Clarrissa	Thompson	4/3/2024	97203
1260	Ann McCrary	Ann	McCrary	4/3/2024	97027
1261	Eli Cox-Skall	Eli	Cox-Skall	4/4/2024	97215
1262	Kendra Platt	Kendra	Platt	4/4/2024	97217
1263	Lorena Sanchez	Lorena	Sanchez	4/4/2024	97132
1264	Jessica Leishman	Jessica	Leishman	4/4/2024	97045