



Portland General Electric

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April 23, 2021

Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: UM 2141 Flexible Load Plan, PGE Supplemental Comments

Dear Filing Center:

PGE submits these supplemental comments to correct an assertion we made in our April 16, 2021 filed comments in response to stakeholder comments. PGE represented, in reviewing the comments of the various stakeholders, that the Oregon Citizens Utility Board (CUB) recommended that PGE include flexible load activity and costs into base rates through inclusion in future rate case filings. After reading our comments, CUB, reached out to correct our assertion on April 21, 2021, and clarified that CUB's position is not that flexible load activity and costs be recovered in base rates but rather, that PGE should present its multi-year plan with its next general rate case. PGE appreciates the clarification as we have been exploring internally, and with OPUC Staff, how Flexible Load Plan costs should transition from the current deferral treatment and what would be the appropriate rate mechanism for doing so.

In supplementing our comments, PGE corrects its assertion about CUB's position, lest others rely on our statement in Reply Comments. Again, we appreciate the high engagement level of stakeholders and the clarification by CUB after reviewing our Reply Comments.

Sincerely,

/s/ Karla Wenzel

Karla Wenzel

Manager, Regulatory Policy & Strategy

Cc: UM 2141 Service List