



October 15, 2021

Dear Chair Decker and Commissioners Tawney and Thompson,

As Oregonians, we share the urgent need to reduce greenhouse gas (GHG) emissions and deliver a clean energy future for our customers. With the passage of HB 2021 and our own climate goals set last year, we are fully committed to reducing GHG emissions from the power served to customers by at least 80% by 2030, 90% by 2035, and achieving zero GHG emissions by 2040.

We are making three filings today in service to achieving those goals, while also continuing to focus on delivering safe, reliable and affordable electric service that benefits all PGE customers:

1. initiating our request for proposals (RFP) from our 2019 IRP Action Plan to procure renewables and non-emitting capacity resources;
2. part one of our inaugural Distribution System Plan (DSP) laying out our vision for building the equitable two-way grid of the future in partnership with our customers; and
3. a waiver requesting an extension of our 2022 Integrated Resource Plan (IRP) to 2023 in order to more fully bring to life the vision of HB 2021.

We are taking the opportunity with these three filings to more clearly articulate what it will take to meet our 2030 emissions reduction target and our plans to get there. Specifically, we are advancing plans to add more renewables and non-emitting resources - partnering with our customers and communities to build a clean, equitable, upgraded grid.

We know we need more clean and renewable resources, faster. We agree with the comments your staff shared in response to our draft RFP this summer: we must move thoughtfully, and with intention, to procure the approximately 1,500 - 2,000 MW of clean and renewable resources we estimate we will need between now and 2030 to meet our target. We also estimate we will need approximately 800 MW of non-emitting capacity resources by 2030 to help ensure continued reliable service is available for all. To make necessary progress to meet the 2030 GHG reduction target and the clean energy expectations of our customers, we are seeking through our RFP approximately 400 - 500 MW of clean and renewable resources, approximately 375 MW of non-emitting capacity resources and an additional 100 MW of clean and renewable resources to meet customer demand in support of PGE's Green Tariff Phase 2 PSO option. We hear our customers clearly: they want cleaner, greener and affordable energy as quickly as possible. If beneficial to customers and in balance with affordability and reliability, we will work with the Commission to evaluate the opportunity to procure additional resources through this RFP, with a potential target of getting up to 1/3 of the clean resources needed to meet the 2030 emissions reduction target. We will work with the Independent Evaluator, Staff and stakeholders in examining paths forward to ensure our system remains reliable and affordable as we decarbonize.

We also know the future grid looks different and involves all of us. We thank you for setting expectations for a human-centered planning approach to the DSP because building a reliable, affordable and equitable clean energy future requires us to partner with customers on how we re-think the electric grid of the future. We are proud to announce our Community Engagement Plan that we co-developed with community-based organizations (CBOs) through our DSP process. Meeting our 2030 goal means partnering with our customers in new and exciting ways, as we estimate that as much as



25% of the flexibility we need to achieve the decarbonized future could come from customers and distributed energy resources (DERs). PGE plans to make strategic investments in its distribution system to enable this transition to a more decentralized, two-way power grid. Key improvements include interconnection process improvement and making the necessary investments in protective equipment and digital sensing devices that can monitor the state of the grid to maintain visibility, security and operational control in a high-DER future. For example, we evolved our net-metering map to our new Distributed Generation Evaluation Map, which integrates U.S. Census demographic data & PGE DER readiness data. This provides greater transparency and visibility to customers who wish to interconnect clean energy technologies to the grid.

Further thoughtful planning and robust engagement is needed to reach the 2030 target. We value the planning process and the ongoing collaboration with the Commission, OPUC staff, customers and key stakeholders as we bring HB 2021 to life. We requested the extension of our IRP to March 2023 in order to make HB 2021-related updates, including formation of the Community Benefits and Impacts Advisory Group, which will help inform development and equitable implementation of our inaugural Clean Energy Plan. We took a critical step toward social and environmental justice in our DSP filing, working with key community groups to ensure that we address and acknowledge disparities and impacts within all the communities we serve. We look forward to expanding this work with the Community Benefits and Impacts Advisory Committee in the months ahead.

We appreciate your and your staff's leadership as we make progress towards the affordable, reliable and equitable clean energy future that we all want.

Sincerely,

*Brett Sims*

Brett Sims  
Vice President, Strategy,  
Regulation and Energy Supply

*Dave Robertson*

Dave Robertson  
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October 15, 2021

Public Utility Commission of Oregon  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: LC 73 – Portland General Electric Company’s Response to Staff Report**

Dear Filing Center:

Enclosed for filing today in the above-referenced docket is Portland General Electric Company's Motion Requesting Extension of Time to File Its Next Integrated Resource Plan.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink that reads "Loretta Mabinton". The signature is written in a cursive, flowing style.

Loretta I. Mabinton  
Managing Assistant General Counsel

LIM: dm

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 73**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

2019 Integrated Resource Plan.

**PGE’S MOTION REQUESTING  
EXTENSION OF TIME TO FILE ITS  
NEXT INTEGRATED RESOURCE  
PLAN**

**I. INTRODUCTION**

Under OAR 860-027-0000 and OAR 860-027-0400(1), Portland General Electric Company (PGE) respectfully requests the Commission waive OAR 860-027-0400(3) and grant an extension of time in which to file its 2021 Integrated Resource Plan (IRP) and associated updates. Specifically, PGE requests that the time for filing be extended from March 16, 2022 to March 31, 2023.

**II. BACKGROUND**

PGE’s 2019 IRP was acknowledged with additional conditions and directives by the Commission on March 16, 2020.<sup>1</sup> As required by OAR 860-027-0400(8), PGE submitted an annual update on January 29, 2021.<sup>2</sup> OAR 860-027-0400(3) requires PGE to file its next IRP within two years of its IRP acknowledgment order. Therefore, PGE’s next IRP is due on or before March 16, 2022.

PGE respectfully requests an extension of this deadline to develop the newly enacted planning requirements established in HB 2021, including but not limited to more robust State carbon targets and the development of a Clean Energy Plan (CEP), as well as to incorporate enhanced analysis in PGE’s next IRP. Further, creating an action plan that provides the ability to meet changing system needs while also addressing decarbonization will require substantial

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<sup>1</sup> Commission Order No. 20-152: <https://apps.puc.state.or.us/orders/2020ords/20-152.pdf>

<sup>2</sup> PGE 2019 IRP Update: <https://edocs.puc.state.or.us/efdocs/HAH/lc73hah13049.pdf>

communication with Staff and our public participants. An extension will allow for a collaborative, comprehensive, and coordinated planning effort across the company that is consistent with Public Utility Commission of Oregon (OPUC) and State requirements. Additional time will also provide PGE and stakeholders the opportunity to consider planning and procurement paths to comply with HB 2021. If granted the extension, PGE intends to make its draft IRP available in time to ensure that sufficient time is provided for stakeholder review.

### **III. SUPPORT FOR MOTION**

An extension will allow the IRP to incorporate increased planning requirements. Included in this planning will be the emission reductions targets established in Oregon House Bill 2021, including reductions of 80%, 90%, and 100% of greenhouse gas emissions by 2030, 2035, and 2040, respectively. Additionally, Oregon House Bill 2021 established two new planning requirements: the CEP and the community benefits and impacts advisory group (CBIAG). The CEP must be based on or included in the IRP and will include several new areas. Additionally, together with the CBIAG, PGE will create a report every two years detailing PGE's impacts and benefits of the CEP to its community.<sup>3</sup> While there is some overlap in planning conducted in the IRP and these two work streams, the additional time will be used to integrate them into one holistic plan.

In addition to the new planning requirements, PGE is currently undertaking a significant redevelopment of several analytical components of the IRP. PGE is working to determine the most informative set of emissions outputs, develop our climate adaptation study, evaluate contractual transmission constraints, and incorporate an enhanced treatment of distributed energy resources. Each of these topics involves additional sharing of information and feedback with Staff and participants, as well as a tangible increase in complexity and interdependence of analyses, requiring more time and effort to set-up, model, interpret, and share results than in previous IRPs.<sup>4</sup> The additional time requested will allow PGE to develop these and the other topics listed above.

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<sup>3</sup> This report must include a discussion of energy burden and disconnections for residential and disconnections for small commercial customers, opportunities to increase contracting with businesses owned by women, veterans and/or Black, Indigenous, or People of Color, actions within environmental justice communities to improve resiliency, the distribution of investments in environmental justice communities, the social, economic or environmental justice co-benefits from PGE's investments, the experience of our customers, and actions to encourage customer engagement.

<sup>4</sup> An example of this complexity can be seen in calculating emissions. The 2019 IRP included annual emission estimates for each of the portfolios evaluated; however, in the next IRP, PGE seeks to work with Commission Staff and our public participants to determine the most informative set of emissions outputs. This will likely increase modeling complexity and require significantly more resources than were allocated in earlier IRPs.

Finally, an extension of time will allow for the opportunity to better characterize the results from PGE's 2021 All-Source request for proposals (RFP).

A critical component of the IRP is a robust participant process. A March 2022 deadline could limit sufficient public process on the areas of development described above. However, an extension will allow the company and its public participants additional time to share information and feedback in order to develop an IRP that is better informed by and responsive to public input. To that end, PGE has been working diligently on developing its 2022 IRP through a robust and transparent public process. Since March 2020, PGE has held twelve public roundtable workshops covering topics including community values and expectations, capacity assessment, transmission analysis, climate adaptation, price futures, supply-side resource options, and distributed energy resources.<sup>5</sup> PGE will continue its robust and transparent public input process with additional monthly public meetings to provide Staff and public participants with the continued opportunity to participate in the IRP development and overall progress.

#### IV. CONCLUSION

For the reasons stated above, PGE respectfully requests that the Commission issue an Order waiving the filing deadline for its next IRP and associated updates, and granting an extension of time for the next IRP to March 31, 2023.

Dated the 15<sup>th</sup> day of October, 2021.



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<sup>5</sup> All meeting materials to date can be found at [IRP Public Meetings - Resource Planning | PGE \(portlandgeneral.com\)](https://www.portlandgeneral.com/irp-public-meetings-resource-planning).