



**DEPARTMENT OF JUSTICE**  
BUSINESS SERVICES DIVISION

November 30, 2023

via E-mail

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97308-1088  
[PUC.FilingCenter@puc.oregon.gov](mailto:PUC.FilingCenter@puc.oregon.gov)

**Re: UM 2141– Request to Extend Timeline for Portland General Electric’s Flexible Load Multi-Year Plan**

As permitted by Oregon Revised Statute (ORS) 756.568 and Order No. 23-321, Portland General Electric Company (PGE) and Staff of the Public Utility Commission of Oregon (Commission) jointly request an extension of the timeline articulated in Order No. 21-158 for filing the Flexible Load Multi-Year Plan (MYP) to the earlier of either December 31, 2024 or when the Commission issues an order on a supplemental PGE MYP filing (see below) to authorize further incremental 2024 program funding and activity. In Order No. 21-158 the Commission required PGE to file its MYP every two years with an annual update. PGE submitted its 2022-2023 MYP on November 3, 2021. Commission Order No. 22-023 approved a modified plan on January 26, 2022, and Errata Order 22-115 was filed on April 11, 2022. Without an extension, the 2022-2023 MYP will conclude December 31, 2023.

Staff requested in the second quarter of 2023 that PGE not submit the new MYP for consideration this year. The extension will avoid program disruptions pending Commission action on the supplemental filing. A filing of the MYP at the end of 2023 is not well aligned with Staff’s resource needs for review of a new MYP – nor does it support discussions regarding integration of the MYP with PGE’s Distribution System Planning (DSP) process.

PGE’s separate, supplemental MYP filing will provide information regarding PGE’s planned 2024 MYP activities, including a proposed 2024 budget with incremental spending adjustments by pilot or program and forecasted megawatt acquisitions. Staff intends to bring that supplemental filing before the Commission for approval of the budget as soon as practical in 2024. Taken together, this extension and the supplemental filing will allow time for Staff to review the proposed 2024 budget and also for PGE, Staff and other stakeholders to continue discussions regarding enhanced coordination of the next full, two-year MYP (2025-2026) with the DSP. The

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extension will also allow time for PGE to incorporate into the MYP any updated demand response goals adopted in the Commission's upcoming order regarding PGE's Integrated Resource Plan.

PGE has previously filed an Application for Deferral and Applications for Deferral Reauthorizations, in Docket No. UM 2234, and proposes to file additional applications for Reauthorization of Deferral by end of this year to authorize MYP expenditures for January 1, 2024 through December 31, 2024.

There is good cause to grant the extension of 2022-2023 MYP through December 2024 because it supports collaboration between PGE and Staff for the efficient management of planning flexible load activity. PGE and Staff discussed the relief requested and are in agreement. PGE and Staff respectfully seek approval of this request by December 31, 2023. Delay in approving or denying the request will jeopardize the MYP in 2024 while a new MYP is developed.

Sincerely,

/s/ Natascha Smith

Natascha Smith,  
Assistant Attorney General  
Business Activities Section

/s/ J. Rich George

J. Richard George,  
Senior Assistant General Counsel  
Portland General Electric Company