



State of Oregon

DEQ Department of Environmental Quality

To: Leah Feldon, Director

From: Office of Greenhouse Gas Programs

Date: Jan. 8, 2024

Subject: Proposed Order of the department's findings, as required by ORS 469A.420, for the verification of greenhouse gas emissions reductions projected in Portland General Electric's 2023 Clean Energy Plan.

Purpose For the purposes of notifying the Oregon Public Utility Commission and Portland General Electric of the findings associated with the verification of projected greenhouse gas emissions reductions forecasted in PGE's 2023 Clean Energy Plan, the Office of Greenhouse Gas Programs is requesting that the Director approve the order attached to this memorandum.

Recommendation The Office of Greenhouse Gas Programs recommends that the Director approve the proposed order, attached to this memorandum.

Background The reasons for this proposed order are described in the findings in the attached order.

Attachments A. Proposed Order

Non-discrimination statement

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Greenhouse Gas Reporting Program, Office of Greenhouse Gas Programs

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DEQ's mission is to be a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.



Order Notifying Portland General Electric and Oregon Public Utility Commission of the Verification of Projected Emissions Reductions Forecasted in PGE’s 2023 Clean Energy Plan under ORS 869A.420

BEFORE THE DIRECTOR OF THE DEPARTMENT OF ENVIRONMENTAL QUALITY

In the matter of notifying the Oregon Public Utility)
Commission and Portland General Electric (PGE)) FINDINGS AND
of the findings of the verification of greenhouse gas) ORDER
emissions reductions forecasted in PGE’s 2023)
Clean Energy Plan as required by ORS 469A.420)

Findings

This order implements the responsibilities given to the Oregon Department of Environmental Quality (DEQ) by ORS 469A.420 to verify greenhouse gas emissions projected in utility clean energy plans for power sold to retail electricity consumers. Subsection (1)(b) of that statute states that “the department shall use the method of measuring greenhouse gas emissions set forth in ORS 468A.280 to verify the projected greenhouse gas emissions reductions forecasted in a clean energy plan ...” Subsection (1)(c) requires that “The department shall report the department’s findings ... to the Public Utility Commission and the electric company seeking acknowledgement of a clean energy plan.”

In this order DEQ’s evaluation of emissions is limited to the verification of the projected emissions reduction data provided as a component of PGE’s 2023 Clean Energy Plan. DEQ’s determination is a verification that PGE’s method of measuring projected emissions associated with power sold to retail electricity consumers in the clean energy plan complies with ORS 468A.280 and rules adopted pursuant thereto, OAR Chapter 340, Division 215.

DEQ’s verification does not evaluate the technical or economic feasibility of the projected data and does not make a determination on the certainty of the projected emissions reductions.

Verification of projected emissions for PGE’s 2023 Clean Energy Plan

After a review and verification of data, DEQ has determined that the data submitted to DEQ by PGE on December 12, 2023, in compliance with their 2023 clean energy plan accurately utilizes the method of measuring projected emissions, as required under ORS 468A.280, and appropriately accounts for the emissions reductions that would occur under the required scenario.

In issuing this finding, DEQ verified that for calculating the projected emissions in PGE’s 2023 Clean Energy Plan:

1. PGE used the method of measuring greenhouse gas emissions set forth in ORS 468A.280 and rules adopted pursuant thereto under OAR Chapter 340, Division 215, including:

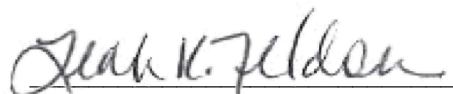
- a. Consistent with OAR 340-215-0120(2) PGE applied DEQ approved and published emissions factors for calculating emissions;
 - b. Consistent with OAR 340-215-0120(1)(B)(i) PGE applied a 1.02 transmission loss correction factor for power not measured at the busbar;
 - c. To align with the current requirements in OAR 340-215-0120 (2)(a), PGE applied the default emission factor of 0.428 metric tons of carbon dioxide equivalent per megawatt-hour for calculating emissions from unspecified power; and
 - d. Consistent with ORS 469A.435, PGE calculated emissions from purchases from Bonneville Power Administration using the asset controlling supplier emission factor published by DEQ.
2. Consistent with ORS 469A.435(2), PGE excluded greenhouse gas emissions associated with electricity acquired from net metering of customer resources and emissions from qualifying facilities under the terms of the Public Utility Regulatory Policies Act.

Order

Based on the findings and as directed by ORS 469A.420, the Department of Environmental Quality verifies that the projected emissions data submitted by PGE to DEQ on December 12, 2023, in compliance with PGE's 2023 Clean Energy Plan requirements, are calculated in accordance with ORS 468A.280.

Dated: 1/10/2024

By:



Leah Feldon

Director

Oregon Department of Environmental Quality