

ORDER NO. 25-140

ENTERED Apr 16 2025

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1020

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Request for Proposal for Program  
Marketing Services for Voluntary  
Renewable Energy Program and  
Acquisition of Renewable Energy  
Certificates.

ORDER

**DISPOSITION: STAFF'S RECOMMENDATION ADOPTED**

At its public meeting on April 15, 2025, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



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**Alison Lackey**  
Chief Administrative Law Judge



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA5

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: April 15, 2025**

**REGULAR** \_\_\_\_\_ **CONSENT**   X   **EFFECTIVE DATE** \_\_\_\_\_ **NA** \_\_\_\_\_

**DATE:** April 7, 2025

**TO:** Public Utility Commission

**FROM:** Eric Shierman

**THROUGH:** JP Batmale and Sarah Hall **SIGNED**

**SUBJECT:** PORTLAND GENERAL ELECTRIC:  
(Docket No. UM 1020)  
Request for proposal for program marketing services for voluntary renewable energy program and acquisition of renewable energy certificates.

**STAFF RECOMMENDATION:**

Approve Portland General Electric's requests for proposals for program marketing services for voluntary renewable energy program and acquisition of renewable energy certificates.

**DISCUSSION:**

Issue

Whether the Public Utility Commission (Commission) should approve Portland General Electric's (PGE or the Company) request for proposals (RFP).

Applicable Rule or Law

ORS 757.603 requires the electric utilities to provide a portfolio of rate options to residential customers. The Commission regulates portfolio options so that the rates reflect the costs and risks of serving each option.

The Commission, in OAR 860-038-0220, provides a process for the development of portfolio options and rates. OAR 860-038-0220(6) requires that the utility offering rate options "acquire the renewable supply resources necessary to provide the renewable

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energy resources product through a Commission-approved bidding process or other Commission-approved means."

## Analysis

### *Background*

PGE requests approval for an RFP to procure program marketing services and/or Renewable Energy Certificate (REC) supply for the Company's residential and small commercial portfolio option products. PGE's current contracts expire at the end of this year. The Commission approved the previous RFP for these services in 2021 with Order No. 21-154. Since meetings of a Portfolio Options Committee (POC) were put on hold in 2020,<sup>1</sup> Staff has facilitated review of RFPs for marketing services.<sup>2</sup>

The Company offers three portfolio option products.

1. **Green Future Block** purchases 200 kilowatt-hours (kWh) of renewable energy for \$1.88 per block monthly.
2. **Green Future Choice** matches 73 percent of a customer's monthly energy consumption with renewable offsets for \$0.94 cents per kWh.
3. **Habitat Support** sends \$2.50 per month per participant to support fish habitat in Oregon.

PGE has been offering portfolio options for more than 25 years, and this has grown to become one of the leading voluntary rate products in the country with a total of 233,627 customers offsetting the emissions of 2,585,299 in 2023.<sup>3</sup> The Green Future Choice product has been the most popular.

Participation in the Habitat Support program is only available to customers that participate in either the Green Future Block or Green Future Choice programs. This RFP does not seek new services for Habitat Support. However, the chosen vendor for marketing services will provide outreach for all three products.

### *Summary of the Draft RFP*

Staff has reviewed PGE's draft IRP. The proposed bidding process allows companies to submit proposals for either or both services. The Company has set a submission deadline of June 3, 2025, with finalist presentations scheduled for the week of June 23, 2025, if necessary. The selection and contract execution will be finalized by August

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<sup>1</sup> See Docket No. UM 1020, Portfolio Options, Commission Order No. 20-063, Appendix A at 7 (March 3, 2020) (pausing meetings of the POC pending an investigation of its continued scope).

<sup>2</sup> See e.g. Order No. 21-154 & Order No. 20-183.

<sup>3</sup> <https://www.nrel.gov/analysis/assets/pdfs/green-pricing-top-10-2022-data-plus-archives-28aug2024.pdf>.

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2025. Proposals must be submitted via email, following the specified guidelines outlined in the RFP.

For Program Marketing Services, PGE seeks a vendor capable of developing and executing a marketing strategy to drive at least 12,000 new enrollments annually through various digital, print, and outreach channels. The volume is necessary to maintain current participation levels, based on recent enrollment and attrition rates.

For REC supply, PGE is looking for a vendor to provide renewable energy certificates sufficient to meet the total participant demand for the Green Future Choice and Green Future Block from 2026 through 2028. PGE prioritizes RECs from renewable projects within Oregon and the Pacific Northwest. Though the availability of Green-e certified RECs for Oregon-based resources has changed, PGE's RFP seeks REC products reflective of the same standards for quality and transparency as in prior RFPs.

Bidders for both services will be evaluated based on their experience, financial stability, and ability to provide competitive pricing. Proposals for marketing services will also be assessed on factors such as effectiveness, customer engagement strategies, and compliance with environmental marketing standards. The REC suppliers will be evaluated on their ability to secure and deliver high-quality RECs while providing market intelligence and mitigating pricing risks. All bidders must adhere to PGE's cybersecurity policies and demonstrate commitment to data security and supplier diversity.

#### *Changes from the Prior RFP*

While the overall approach to services reflected in PGE's RFP has not changed radically since the Company's last RFP, the REC market has changed for Oregon-based resources. Due to the Center for Resource Solutions (CRS) no longer certifying RECs that may be associated with HB 2021 compliance, the nature of the PUC's oversight of these portfolio options products has changed. Staff supports PGE's evolving position on program administration while maintaining program integrity. PGE has already removed references to Green-e certification from both its tariffs and the Company's marketing. Additionally, one important aspect of this RFP is that PGE intends to mitigate any REC quality concerns, due to CRS's position on RECs associated with HB 2021 compliance, with the requirement that the REC supplier procure RECs that could qualify for Green-e certification, even if certification is not available. This means PGE plans to manage these products in the same way as the past.

The vendor that wins the contract for marketing in this RFP will need to continue to avoid false claims about the emissions impact of program participation while the supply vendor will be continuing to source RECs capable of being Green-e certified.

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*Stakeholder Engagement*

PGE filed this draft RFP on March 7, 2025, with an invitation for stakeholders to comment by March 24, 2025. No stakeholders filed comments. Staff is not aware of any stakeholder that opposes Commission approval of this RFP.

Conclusion

Staff recommends the Commission approve PGE's proposed RFP for marketing and supplying resources for residential and small commercial portfolio options. The Company's draft RFP is reasonable. The bidding process is valid, and the draft RFP is consistent with prior RFPs the Commission has already approved. PGE has made reasonable efforts to engage stakeholders in how to manage the challenges of providing portfolio options without the ability to receive Green-e certification.

**PROPOSED COMMISSION MOTION:**

Approve Portland General Electric's requests for proposals for program marketing services for voluntary renewable energy program and acquisition of renewable energy certificates.

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