



Portland General Electric Company

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November 22, 2022

Via Email

Public Utility Commission of Oregon
201 High Street SE, Suite 100
PO Box 1088
Salem, OR 97308-1088

Re: LC 73 – Portland General Electric Company’s 2019 Integrated Resource Plan (IRP)

Dear Filing Center:

Enclosed for filing in the above referenced docket is Portland General Electric Company’s motion requesting waiver of IRP Guideline 2(c).

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Apperson", with a long horizontal flourish extending to the right.

Erin E. Apperson
Assistant General Counsel III

EEA:bp

Enclosure

**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
WAIVER OF INTEGRATED
RESOURCE PLAN GUIDELINE 2(c)**

I. INTRODUCTION

Portland General Electric Company (PGE) respectfully requests consideration of an alternative process to Integrated Resource Plan (IRP) Guideline 2(c), which states that a utility must provide a written draft IRP prior to filing the final plan.¹ While it is not clear that a formal waiver of an IRP guideline is necessary, should the Public Utility Commission of Oregon (Commission or OPUC) determine that a waiver of the guideline is appropriate in this case, PGE respectfully requests that the Commission waive IRP Guideline 2(c).

As the IRP evolves to meet the intent of House Bill (HB) 2021, and subsequent Commission guidance under Docket UM 2225, HB 2021 Investigation into Clean Energy Plans (CEPs), PGE aims to meet the intent of Guideline 2(c) through a stakeholder facilitation process that is collaborative, efficient, and responsive to both the IRP and the CEP guidelines and requirements.

II. SUPPORT FOR REQUEST

On October 15, 2021, PGE filed a waiver requesting an extension of time to file the 2022 IRP, in part, to implement HB 2021 more fully.² In Order No. 21-422, the Commission granted

¹ Guideline 2(c) states that “[t]he utility must provide a draft IRP for public [review and comment prior to filing a final plan with the Commission.” OAR 860-027-0400(2) states “[a]s used in this rule, “Integrated Resource Plan” or “IRP” means the energy utility’s written plan satisfying the requirements of Commission Order Nos. 07-002, 07-047 and 08-339, detailing its determination of future long-term resource needs, its analysis of the expected costs and associated risks of the alternatives to meet those needs, and its action plan to select the best portfolio of resources to meet those needs.”

² *In the Matter of Portland General Electric Company, 2019 Integrated Resource Plan*, Docket No. LC 73, PGE’s Motion Requesting Extension of Time to File Its Next Integrated Resource Plan (Oct 15, 2021) and Order No. 21-422.

that waiver request. Then, in Order No. 22-206, the Commission directed PGE to file the first CEP with the next IRP, as a chapter, appendix, or accompanying filing.³ Staff, stakeholders, and the Commission have devoted significant time and resources to provide guidance efficiently and expeditiously for the first CEPs in Docket UM 2225. Specifically, the OPUC Staff has undertaken several workstreams from January 2022 through September 2022 resulting in Commission guidance regarding utilities' CEPs. In Order No. 22-390, the Commission addressed “a. The development of the roadmap of actions and goals in the first CEP [and] b. The Community Lens Analysis conducted in the first CEP”⁴ and, most recently, the Commission issued Order No. 22-446 addressing the analytical improvements workstream. Two additional workstreams are still ongoing: procedural issues; and resiliency industry standards and best practices.

While significant work has been done in UM 2225, these efforts are continuing. For example, rules addressing the CEP have not yet been established. Staff has proposed it request the Commission open the formal rulemaking process at the December 13, 2022, Public Meeting. Granting this waiver will allow time for the formal rulemaking process to move forward and for the Commission to adopt new rules.

PGE continues to work toward its March 31, 2023, filing date for both the IRP and the first CEP. Qualitative and quantitative analysis for both plans is directly impacted by CEP expectations adopted by the Commission in Orders 22-390 and 22-446, issued October 25, 2022, and November 14, 2022, respectively. Considering the compressed schedule to conduct new analysis and engage new community groups related to the CEP, PGE anticipates that CEP materials will not be at a level of maturity by January 2023 in which PGE can provide a full draft. Given the interwoven nature of CEP and IRP materials, these gaps would also render an IRP draft incomplete and potentially misleading. In parallel to the drafting process, PGE expects to seek robust public input via the alternative processes described below.

The intent of providing a draft IRP prior to filing a final IRP will be met through our IRP Roundtables. PGE has continued our stakeholder outreach and engagement work through the IRP Roundtable process, which is a critical component of the IRP. PGE holds monthly Roundtable

³ The Commission also stated that “the Commission may authorize either utility to file the CEP, or specific components of the CEP, within up to 180 days of filing the IRP if the utility demonstrates that filing the CEP with the IRP would create an undue burden.” *In the Matter of Public Utility Commission of Oregon, House Bill 2021 Investigation into Clean Energy Plans*, Docket No. UM 2225, Order No. 22-206, Appendix A at 1 (June 3, 2022).

⁴ Docket No. UM 2225, Order No. 22-390, Appendix A at 1 (Oct 25, 2022).

meetings with interested participants to address areas of development of the upcoming IRP. These Roundtable meetings include topics such as capacity assessment, transmission analysis, climate adaptation, price futures, supply-side resource options, and distributed energy.⁵ Additionally, PGE is hosting a new community engagement forum, called Learning Labs, to broaden the representation and accessibility of our planning process for the CEP.

Sharing the detailed information that would typically be presented in the draft IRP in digestible pieces through the IRP Roundtables and Learning Labs has proven to be a more effective approach to solicit input in an actionable way than a formal draft and written comment process. PGE has gone to great lengths to incorporate engagement best practices and respond to participants' suggestions to ensure that the Roundtables and Learning Labs effectively:

- Raise awareness of PGE's processes and increase participants' knowledge of CEP, IRP, DSP and other relevant energy topics.
- Ensure near-term and long-term co-development of community-aligned solutions for future projects (e.g., community-based renewable energy).
- Create, maintain, and cultivate relationships with new and existing participants such as community-based organizations, community-service organizations, environmental justice advocates, and others.
- Generate data, analysis, and information that reflects the engagement efforts across long-term planning processes.

PGE is committed to providing transparent, accessible, relevant content to stakeholders within the IRP and CEP. To date in 2022, PGE has hosted ten IRP Roundtable meetings and three Learning Labs. We intend to continue and expand upon this process through hosting an additional four IRP Roundtables and four Learning Labs before filing our CEP and IRP in March 2023. In these future workshops, we intend to discuss PGE's future long-term resource needs to meet our decarbonization goals, our analysis of the expected costs and associated risks of the alternatives to meet those needs, and our action plan of the selection of the best portfolio of resources to meet those needs.

⁵ 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).

III. CONCLUSION

For the reasons stated above, PGE respectfully requests that the Commission issue an Order waiving IRP Guideline 2(c) should it deem a waiver of the guideline appropriate in this case.

Dated the 22nd day of November, 2022.



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