

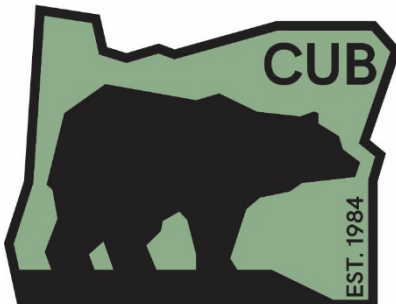
**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of)
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)
 PORTLAND GENERAL ELECTRIC)
 COMPANY,)
)
 2019 Integrated Resource Plan Update.)
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REPLY COMMENTS
OF THE
OREGON CITIZENS' UTILITY BOARD
TO STAFF REPORT

April 12, 2021



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of)
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PORTLAND GENERAL ELECTRIC)
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2019 Integrated Resource Plan Update.)
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I. INTRODUCTION

The Oregon Citizens' Utility Board (CUB) hereby submits its comments on the Public Utility Commission of Oregon Staff's (Staff) Report (Staff Report) on Portland General Electric Company's (PGE) 2019 IRP Update in LC 73.

CUB appreciates Staff's extensive analysis of the IRP. CUB also commends PGE for involving and responding to stakeholders' concerns throughout the IRP process. CUB largely supports Staff's recommendations to the Commission regarding acknowledgement of PGE's 2019 IRP Update. CUB restates a few of its earlier concerns and asserts that these should be taken up in PGE's next IRP filing. These concerns include the treatment of a single large

industrial customer in the Company's industrial load forecast, accounting for potential direct access load in the industrial load forecast, and an updated analysis of the impact of COVID-19 on commercial load forecast.

II. COMMENTS

A. Industrial Load Forecast

CUB is concerned that the industrial load drivers included in PGE's industrial load forecast model, in particular US GDP, do not accurately capture the industrial landscape in PGE's service territory. PGE's industrial load is dominated by a single customer that the load forecast model needs to account for. Major plant expansions or contractions by the large industrial customers would likely be the main driver of PGE's industrial load. CUB looks forward to engaging in future discussions with the Company to address the single-customer issue in its PGE's industrial load forecast. In this regard, CUB appreciates PGE's willingness to provide a comparison of its load forecasting model against those used by other utilities in the region, as was recommended by CUB.

CUB appreciates PGE's and Staff's explanation for the treatment of new direct access load in PGE's industrial load forecast. CUB agrees that with a cap in place there is less uncertainty around the current and near-term direct access load. CUB, however, is concerned about potential direct access load that could materialize in the future in the event the current cap is expanded. This possibility cannot be ruled out given the ongoing investigation into the issue of direct access in Docket No. UM 2024. PGE's long-term load forecast should account for this possibility. Given the uncertainty around the parameters of both PGE's direct access and new load direct access programs, CUB would like PGE and stakeholders to continue to review the programs' effects on the Company's system.

B. Commercial Load Forecast

CUB looks forward to an updated analysis of PGE's commercial load forecast. CUB stated in its comment that PGE's forecast of an increase in the growth rate of its commercial load from 0.5% to 0.9%, following the post COVID-19 decline, may not realize if there are significant number of permanent business closures in the area. CUB supports Staff in recommending that PGE not use out-of-model adjustments to analyze impacts of COVID-19 on its customer load.

III. CONCLUSION

CUB appreciates the opportunity to participate in PGE's 2019 resource planning process. CUB supports Staff's recommendations to the Commission for PGE's 2019 IRP Update. CUB still has some concerns about PGE's load forecasting and looks forward to discussing these issues in future IRP meetings.

Dated this 12th day of April 2021

Respectfully Submitted,



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