

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 73

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

2019 Integrated Resource Plan

RENEWABLE ENERGY COALITION'S
COMMENTS ON THE STAFF REPORT

COMMENTS

The Renewable Energy Coalition (the "Coalition") provides these comments on the Staff Report that recommends acknowledgement of Portland General Electric Company's ("PGE's") 2019 Integrated Resource Plan ("IRP") Update.

The Coalition disagrees with Staff's recommendation to acknowledge. The Coalition is concerned that Staff misunderstands the Coalition's concerns with PGE's planning errors. These flaws result in inaccurate avoided cost pricing, but it is the planning errors themselves that must be fixed. These corrections cannot be addressed in a later avoided cost filing; they must be addressed in the IRP Update review process itself. The Coalition respectfully requests that the Oregon Public Utility Commission consider the planning errors discussed in the Coalition's March 10, 2021 Comments¹ and *not* acknowledge PGE's 2019 IRP Update.

¹ The Coalition maintains its concerns and recommendations as stated in comments filed on March 10, 2021 without repeating them here. Further, the Coalition may raise additional issues in PGE's post-IRP acknowledgment avoided cost price filing expected on May 1.

Dated this 12th day of April 2021.

Respectfully submitted,

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