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From: Elizabeth Graser-Lindsey /s/ Elizabeth Graser-Lindsey
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Date: Sept. 12, 2023

Re: PGE CEP/IRP Report filed in Docket No. [LC 80](#)

PGE choose a plan for a linear reduction in greenhouse gas (GHG) emissions

Figure 78. Decarbonization glidepath portfolios

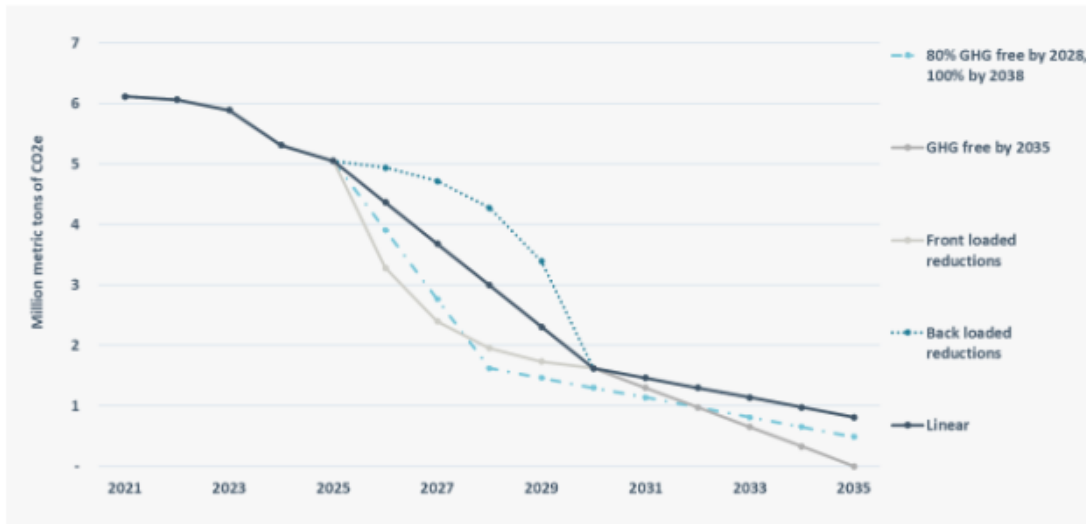
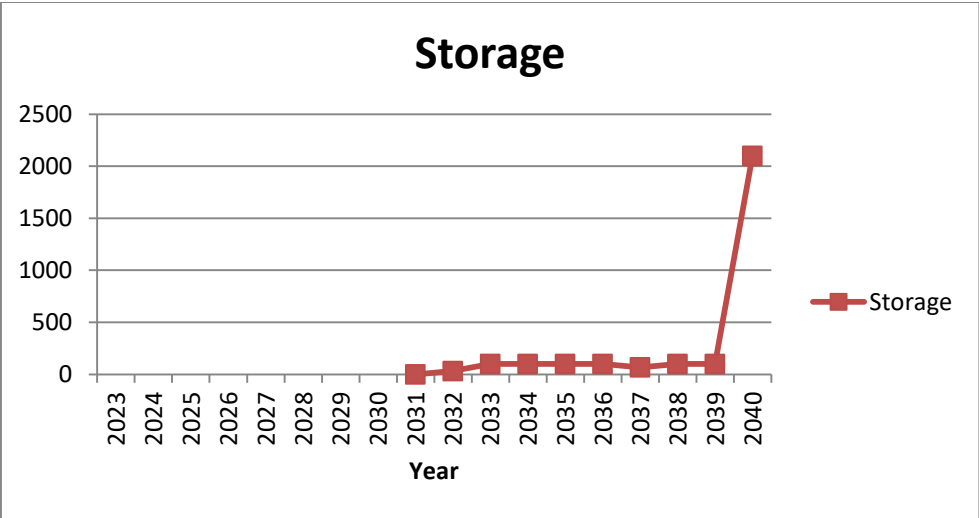


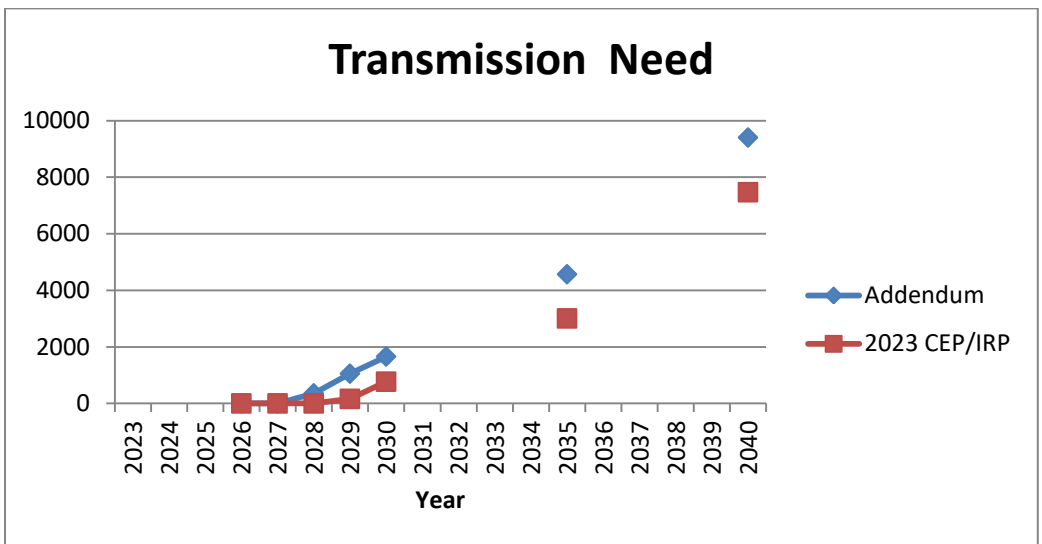
Figure 79. Cumulative emissions 2024-2043, accelerated decarbonization glidepath portfolios

which PGE claims will allow it to comply with HB 2021's emission reduction targets; however, your staff's report (OPUC Staff Opening Comments) highlights data at Fig. 5 Preferred Portfolio resource additions (p. 26) – notice "Storage" – and Table 4 PGE's identified transmission need (p. 3)) that shows PGE's plan is unlikely to achieve this goal, because PGE's plan requires a huge instantaneous increase in storage in the final year of the plan (as it abruptly ends reliance on its thermal/natural gas/peaker plants)



From Fig. 5 Storage

and every-more-rapid growth in transmission in the final years



From Table 4

to comply with the legal GHG reduction targets.

It isn't just difficult, it is predictably unrealistic, that PGE could achieve clean-energy compliance, reasonable risk, or reasonably steady rates when such an abrupt increase in storage and transmission would be required in the final year(s) of the plan.

When PGE's plan is predictably unachievable, then PGE needs to plan compliance through more steadily increases in storage and transmission over the years of the plan; that is to say, PGE needs to front load GHG emission reductions (which are easier in the beginning) to achieve compliance in the end.