



**Portland General Electric**  
121 SW Salmon Street • Portland • Ore. 97204  
PortlandGeneral.com

June 16, 2025

Janine Benner, Director  
Oregon Department of Energy  
550 Capitol Street NE  
Salem, Oregon 97301

**Re: Senate Bill 1525, Section 11 Report for 2024**

As Portland General Electric (PGE) and the region transition to clean resources, and as climate-fueled extremes become more common, PGE's Dispatchable Standby Generation (DSG) program plays a critical reliability role. This program calls on both backup generators and batteries to support grid reliability. The program enrolls backup generators owned by non-residential customers to be available to PGE for up to 50 hours per year to help maintain grid reliability in accordance with Environmental Protection Agency (EPA) rules and Oregon Department of Environmental Quality (DEQ) permits.

SB 1525A Section 11 (2024 session) requires PGE to submit a report to Oregon Department of Energy (ODOE) by June 1 of each year, providing aggregate operational information for the DSG Program. This letter is intended to satisfy that requirement for the 2024 calendar year.

2024 Calendar Year Information		
1.a	Number of generators	87
	Total generation capacity (MW)	141
1.b	Total operating hours	338
	Average operating hours per generator	3.88
1.c	Annual Ultra Low Sulfur Diesel consumption (gal)	25,327
	Annual R99 renewable diesel consumption (gal)	10,463
1.d	R99 is readily available in the marketplace. There is an ample supply in the region with multiple suppliers available at a price point similar to regular diesel fuel. Note that fuel selection is at the discretion of the equipment owner and is dependent on equipment warranties.	
1.e	Compliance with ORS 469.320 (2)(g)(C)(ii): PGE has not yet enrolled any large >25MW dispatchable standby generation sites that would be required to comply with ORS 469.320 (2)(g)(C)(ii).	

If you have any questions regarding this report, please Penny Machinski (503-975-0162, penny.machinski@pgn.com).

Respectfully,

*Penny Machinski*

Penny Machinski (Jun 16, 2025 11:38 PDT)

Penny Machinski

Manager Environmental Science & Compliance  
Portland General Electric

cc: Shane Freepons, PGE  
Christy Splitt, ODOE