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VIA ELECTRONIC FILING  
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**RE: Portland General Electric's Comments in Response to the Commission's Draft Work Plan on Governor Brown's Executive Order 20-04**

Portland General Electric Company (PGE) appreciates the opportunity to offer comments on the extensive draft work the Public Utility Commission of Oregon (OPUC or Commission) plans to undertake to help reduce greenhouse gas (GHG) emissions in accordance with the Governor's Executive Order (EO) 20-04. We find the specificity outlined, including goals and objectives, roles and responsibilities of participating parties, and activities for the first and second year valuable. Our perspective is that the workload envisioned may be pressing at times and realize the schedules may have to adjust for unanticipated issues and resource challenges. As Chair Decker commented at the CUB conference, these are ambitious plans that may require moderation depending on OPUC Staff, stakeholder and utility resources and bandwidth. This is a marathon, not a sprint, and we will be fully engaged in the work with you.

The clear focus of the prioritized work on large scale decarbonization through supply and demand side resources and transportation electrification is aligned with our company's strategy. We see as critical the additional priorities of wildfire mitigation, inclusion of nontraditional stakeholders in shaping Commission policy, and considerations of the GHG impacts of voluntary customer products for us to continue to provide safe, reliable, increasingly clean and affordable energy to meet our customers' needs.

Fairness is an additional, important lens to apply to this work. If costs are imposed on utility supply, customers who have the choice of alternate suppliers may choose to avoid the utility costs and seek another supplier. In this scenario, decarbonization costs could be shifted to customers who remain on cost of service and could unfairly threaten the remaining customers' affordability.

Based on earlier opportunities to share input, the Commission's decision to apply EO 20-04 as a lens on existing proceedings where possible, rather than creating new dockets or investigations, is a streamlined approach we would encourage further application of in the transportation electrification focus areas. In wildfire planning, we asked for the Commission to establish

wildfire mitigation planning guidelines without delay, and we are pleased this priority work has already begun.

Finally, we applaud the Commission's efforts to create a more diverse, equitable, and inclusive workforce and agency operation. In the Senate Bill (SB) 978 work, PGE was active on several teams, including the equity team and the work to more meaningfully engage impacted (and underrepresented) communities. PGE shares the belief that a commitment to diversity, equity, and inclusion (DEI) is essential to a thriving and successful organization, and we look forward to working with the OPUC to address the needs of low-income customers and reduce energy burden.

Our comments are attached and organized to correspond to the priority areas of the work plans: Utility Planning, Utility Services and Activities, Transportation Electrification, Impacted Communities, and Wildfire Prevention and Mitigation. In some of these areas, our comments address specific activities, while elsewhere we respond to the OPUC's objectives. Across the OPUC's work plans, activities focus on the utilities. PGE requests that the Commission consider whether there are activities that should include all electricity suppliers, particularly electricity service suppliers (ESSs), with regard to planning and reporting. Oregon's policy on GHG reduction is too important not to include all electricity suppliers, where appropriate, and this would be most fair to all customers.

Thank you for the opportunity to comment. We look forward to the work ahead.

*/s/ Karla Wenzel*

Karla Wenzel  
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Portland General Electric Company

## **A. Comments Regarding GHG Reduction Activities Part 1: Utility Planning**

PGE is generally supportive of the Commission’s workplan for greenhouse gas (GHG) reduction activities related to utility planning and decarbonization and we appreciate OPUC Staff engaging with our IRP team during the development of this work plan.

We welcome the proposed update of the Integrated Resource Plan (IRP) Guidelines to account for GHG costs and risks as a Year 1 priority (page 4). PGE notes that our IRP framework already possesses carbon considerations that could be leveraged and built-upon to identify additional planning practices to reduce GHG emissions consistent with the long-term public interest. In our most recent IRP, these included the implementation of carbon constraints within portfolio optimization; an economy-wide decarbonization scenario; and, informational sensitivity using the social cost of carbon (SCC) as the regional cost of carbon.

The OPUC’s utility planning workplan for the next year includes potential changes to IRP modelling and processes (portfolio development, forecasting, decarbonization, and stakeholder engagement) and exploration of increased application of the SCC in future IRPs to reflect Oregon energy policy as articulated in EO 20-04. PGE provides comments below on the bulleted list of IRP proposals on pages four through five of the workplan, followed by a discussion of the incorporation of the SCC into future IRPs.

### **Portfolio Development (page 4)**

- “Include a portfolio sensitivity of meeting EO 20-04 emission targets on an absolute/mass basis.”
  - PGE supports planning to a carbon constraint such as the EO 20-04 emissions targets. PGE looks forward to working with Staff and stakeholders to determine the most appropriate reduction trajectories.
- “Assess Costs/Risk of missing EO 20-04 emission targets.”
  - PGE seeks clarification on the interpretation of this proposal beyond planning to carbon emissions targets.
- “Require the reference portfolio to meet EO 20-04 emissions targets in each year leading up to 2035.”
  - PGE supports planning to a carbon target, such as the EO 20-04 emissions targets. PGE looks forward to working with Staff and stakeholders to determine the most appropriate reduction trajectories.
- “Calculate each portfolio’s annual GHG emission levels.”
  - PGE already calculates and reports portfolio GHG emissions as part of our current IRP framework.
- “NPVRR [Net Present Value Revenue Requirement] of EO 20-04 portfolios, e.g. 100% RPS or Clean Peak Standard.”

- PGE seeks clarity on the nature of “EO 20-04 portfolios.” Generally, PGE is happy to accommodate requests from stakeholders to run specific portfolios provided they are received within a certain timeframe.
- “12x24 Matrix of emissions of portfolios.”
  - This would require significant additional analysis due to the granularity of reporting requested if completed for all years. PGE agrees with the idea of portfolio emissions reporting but suggests OPUC Staff request intra-annual emission information for specific years of interest.

### **Forecasting (page 5)**

Many of the proposed IRP forecasting changes call for actual emissions data in addition to projected data. PGE supports reporting projected GHG emissions in our IRP as it is fundamentally a forward-looking process; however, other sources may be better placed to provide the OPUC with backward looking actual emissions data.

- “GHG Forecast on absolute/mass basis (Actual v. Projected).”
  - PGE already forecasts projected portfolio GHG emissions in our IRP.
- “Carbon intensity per customer class (Actual v. Projected).”
  - PGE’s IRP plans for all cost-of-service customer load without delineation by customer class. PGE seeks clarification on this request.
- “Load reduction: Recognize communities adopting Green Tariffs or decarbonization goals in planning.”
  - PGE is including its Green Energy Affinity Rider in the 2019 IRP Update analysis, and as future programs develop to address our customer and community decarbonization goals, PGE will include such programs in future IRP analysis.

### **Decarbonization (page 5)**

- “Always include an assessment of non-emitting, baseload, generation resources in preferred portfolio development.”
  - PGE is happy to accommodate requests from stakeholders to run specific portfolios provided they are received within a certain timeframe. However, PGE seeks clarification on what is included or excluded in the definition of “non-emitting, baseload, generation resources.”
- “Include analysis of the distribution grid as a decarbonization resource in terms of GHG emission reductions through fossil fuel generation displacement and as flexible load for renewables integration.”
  - PGE’s IRP framework already captures system emission reduction benefits from forecasted Distribution Energy Resources (DER) trajectories. PGE plans to build upon DER trajectory characterizations from previous studies in the ongoing DER Study and capture the corresponding impact on need, portfolio selection and emissions. We look forward to working more with Staff and the participants in our public process to further develop and refine this analysis. We also question

whether evaluation of the distribution grid as a decarbonization resource should be undertaken in the IRP or DSP context and identify the need for a coordinated and integrated approach.

- “Develop a portfolio sensitivity for a high level of near-term, beneficial electrification and electric vehicle adoption.”
  - As part of the 2019 IRP, PGE commissioned a DER Study which included scenarios of Low, Reference and High DER forecasts, including electric vehicles. Additionally, the IRP included a Decarbonization Scenario for portfolio analysis. We will continue to include scenarios of DER forecasts consistent with PGE’s distribution resource plan (DRP) study that will inform our next IRP.
- “For electric utilities, continue to assess NPVRR of early-retirement of all fossil fuel generation in every IRP.”
  - The evaluation of the potential retirement of all of PGE's thermal resources endogenously would require significant changes to PGE’s portfolio selection model. This effort likely outweighs the benefit of this retooling, especially as we currently already have the capability to evaluate specific early retirement scenarios (as was done with the Colstrip sensitivities in the 2019 IRP). Rather than modeling the potential for all thermal resources to retire, PGE suggests working with stakeholders to determine which early retirement scenarios could provide the most insight for the planning process.
- “Model a cap on total emissions in the action plan timeframe (e.g., any new increases require reductions elsewhere in the system).”
  - PGE is generally supportive of this proposal. See comments above under Portfolio Development.
- “Consider risk of customers leaving utility service for lower-carbon options to meet carbon reduction requirements or goals and stranding remaining customers with system costs.”
  - PGE’s IRP framework does not currently include scenarios with load leaving cost-of-service to seek lower carbon options. PGE does not have visibility into our customers’ future plans; however, PGE seeks to continue to equitably provide all our customers with safe, reliable, affordable and increasingly decarbonized electricity.
  - An additional concern is the risk of customers leaving utility supply for third party supply service to bypass the increased costs of GHG reduction activities that are required of regulated utilities but not of third-party suppliers.

#### **Stakeholder Engagement (page 5)**

- “Utilities host decarbonization plan workshops to solicit and incorporate stakeholder feedback prior to IRP.”
  - PGE is supportive of discussing how we incorporate further decarbonization discussions into our existing public roundtable processes.

## **Other (page 5)**

- “IRP as forum for discussion of pilots to develop supply chains for low-carbon resources and to decrease carbon risks and future costs.”
  - PGE is generally supportive of exploring carbon risks as part of the IRP long-term planning process. In the IRP framework, PGE plans to continue exploring and discussing promising low-carbon resources as we consider potential supply side options.

## **Incorporation of SCC in Future IRPs (page 6)**

As the OPUC workplan acknowledges, the SCC is already used as an informational sensitivity analysis in the PGE IRP. PGE is supportive of further incorporating consideration of the SCC into the utility long-term planning process to work towards decarbonization; however, we note that Oregon does not currently have a carbon price, so any planning analysis that incorporates the SCC will not reflect the actual market.

The workplan also proposes including the SCC in the IRP NPVRR and the SCC as a sensitivity in all valuations to show the difference. In the 2019 IRP, PGE informationally considered an IRP Market Price Future that used the SCC and assessed the NPVRR of portfolios that considered that Market Price Future. We support the use of the SCC in both listed activities and welcome more formal inclusion of the SCC in the utility planning process in the future. Finally, the workplan proposes that “[p]ortfolios include high (SCC), medium, and low gas and coal price forecasts in stochastic analysis to reflect the impact of potential carbon policy on company-owned resources.” PGE would support using the SCC as one of our carbon price trajectories and agrees that it be used as the high carbon price scenario.

## **Incorporate SCC in Avoided Cost (AC) Filings**

PGE is generally supportive of exploring how SCC may be incorporated into avoided costs for customer-driven distributed energy resources (DERs). PGE requests consideration of how avoided costs are treated between DER cost-effectiveness, IRP and DSP to ensure SCC impacts are not double counted. In-addition, PGE does have concerns regarding the impact of adding SCC to qualifying facility (QF) avoided costs as there is potential it may inflate the costs to customers, not align with market pricing, and incentivize developers to develop projects in Oregon versus other states, further impacting customer prices. Currently, PGE’s QF costs are bypassed by large nonresidential customers choosing an ESS to supply them electricity.

## **Procurement**

The proposal to ensure GHG-related risks are visible in the procurement process by potentially incorporating GHG reduction benefits into non-price scoring factors, seems to fit with procurement of a nonrenewable resource. Should the Commission have authority over the procurement of physical resources by third party suppliers (ESSs), similar transparency policies should also be applied to them.

## **B. Comments Regarding GHG Reduction Activities Part 2: Utility Services and Activities**

### **Community-wide Green Tariff**

Under this section of the EO workplans, PGE welcomes the OPUC's Year 1 objective to provide guidance for utilities and communities so that communities that want to use 100% green energy can. Throughout 2020, PGE has been engaging with municipalities that have adopted climate action plans, climate resolutions, or clean energy resolutions with strong clean electricity goals, and has begun exploring potential processes for engagement on the design of a municipal green tariff. The municipalities, in turn, are engaging with their communities on design features. Our comments below focus on the OPUC's authority to approve a community-wide green tariff, the role of the Portfolio Options Committee (POC) in making recommendations to the OPUC, and general support for the re-envisioning of the POC through an equity lens.

PGE is supportive of the workplan's proposal for stakeholder workshops aimed at developing guidance for utilities and municipalities that will allow the implementation of community-wide green tariffs. PGE also notes that the workplan proposes reorienting and relaunching the POC with broader stakeholder representation in Year 2. PGE seeks clarity on the OPUC's authority to approve a community-wide green tariff, offered within the geographical boundaries of a given municipality, and the role of the POC in making recommendations to the OPUC.

PGE recommends that the OPUC consider using the Q4 2020 workshops to: listen to the needs of municipalities; hear from utilities how tariff designs could respond to those needs; receive input from OPUC Staff as to how they would engage in the process to protect customers; and then share with all interested parties the perceived extent of the OPUC's authority to approve any tariffs that are developed. Understanding the OPUC's authority early in this process should make the workshops scheduled for 2021 more productive. In addition, given the POC may not be relaunched until the end of 2022, PGE would welcome clarity on the role of the POC in making recommendations to the OPUC regarding potential community-wide green tariffs.

Regarding the POC itself, we support the OPUC's plan to re-envision it with broader stakeholder representation. Accordingly, PGE welcomes the OPUC's plan to create the role of DEI Program Director in Year 1. The timely recruitment of the DEI Program director should facilitate more meaningful and intentional engagement in the design of community-wide green tariffs during the first year of the workplan, as well as potentially ensuring that an equity lens is applied to the relaunch of the POC.

PGE is excited for the OPUC's plans to bring parties together to explore community-wide green tariffs and looks forward to discussing the workplan further at the November 19, 2020, Special Public Meeting. As a potential topic for consideration at the Special Public Meeting, PGE requests discussing municipalities that would like to move faster than the timeline envisioned in the work plan, with an exploration of how those municipalities' needs could be accommodated.

**Streamline and modernize interconnection methods and valuing system contributions of clean resources.**

PGE looks forward to participating in the interconnection reform investigation and appreciates the work plan's recognition of the need to integrate with related dockets, including distribution system planning, qualifying facilities, net metering, and community solar. As there are a considerable number of ongoing and anticipated processes and proceedings related to this subject, care must be taken to ensure consistent policies and avoid unintended consequences that could result in customer harm.

**Consider how to quantify and incorporate measurable co-benefits like GHG emission reductions, air quality improvement, health benefits and reduced energy burden, as relevant to initiatives.**

PGE looks forward to learning more about where this may be applied beyond the mentioned targeted replacement of wood stoves. Regarding objective #1 and directing utility pilots to quantify and assess GHG emissions impacts of pilots at scale, PGE suggests that Staff consider including this in Staff's pilot to program transition guidelines as a pilot is ready to transition.

**Measure GHG reduction impacts of existing customer programs and products such as the voluntary renewable energy purchasing programs, to inform stakeholders and improve the GHG reduction benefits.**

PGE looks forward to participating in this work initially aimed at the Community Solar Program and the ETO and OHCS's public purpose charge-supported programs, and in year 2, aimed at all customer choice programs including the voluntary portfolio options programs offered.



## **C. Comments Regarding GHG Reduction Activities Part 3: Transportation Electrification (TE)**

PGE agrees that TE is a critical pathway to reducing Oregon’s GHG emissions. Specifically, as the transportation sector transforms, customers must have access to clean and affordable electricity as a transportation fuel. We embrace our role as an essential service provider that serves this public good. By working together, quickly, we can support the transformation of the transportation sector and the Commission’s draft work plan is a step in that direction. In addition, we appreciate Staff’s support of PGE’s TE Plan, our new and existing pilots, and our Clean Fuels Programs. Despite the challenging circumstances of 2020, we’re pleased to have completed the electric avenue network, funded Oregon’s first electric buses, and made the bold commitment of electrifying 60% of our fleet by 2030.

PGE can see that its earlier comments from June were taken into consideration including our requests for more streamlined regulatory processes and our cautions around how new processes could create unintended delays. Although we are generally supportive of this work plan, PGE has concerns regarding what seem to be new processes proposed. We provide comments directed in three areas: 1) process and pace; 2) prescribing program requirements; and 3) cost effectiveness and social cost of carbon.

### ***1. Process and Pace***

PGE is curious how the identified activities relate to those already prescribed in Oregon Administrative Rule Chapter 860 Division 87 regarding utility filed Transportation Electrification Plans. For example, the work plan identifies a near-term objective of exploring and assessing TE cost effectiveness and developing “a robust data collection process into market transformation indicators to be tracked by the utilities and shared annually with the OPUC, in addition to TE plans” (page 17). In addition, public workshop needs are identified along with input from the Regulatory Assistance Project. Some of these first-year activities seem to overlap with TE Plan requirements or could be incorporated into the TE Plan review process. PGE’s TE planning will be well underway in the work plan’s first year. If these are to be incremental to already required activities, PGE cautions that the sense of urgency recognized in the Governor’s executive order may be lost if pace and progress are slowed by more Commission process. For the state and communities to meet aggressive decarbonization and electrification goals, expeditious progress is required. PGE encourages Staff to consider areas where process already exists and leverage them. If such processes are inadequate, PGE is open to collaborating with Staff to limit impacts on pacing.

### ***2. Prescribing Program Requirements***

PGE notes Staff’s proposal to consider energy storage as part of line extension allowances (LEAs) for TE. Although PGE is generally supportive of building flexibility on its system and acknowledges storage can be a valuable resource, it may not always make sense for customers who are building charging infrastructure on their properties. Prescribing such a requirement may

add undue cost or burden (e.g. real estate) for customers and seems outside the scope of the Executive Order.

### ***3. Cost Effectiveness***

As Staff suggests, it is important for utilities to have clarity on guidelines to inform investments. We have had productive discussions with stakeholders on cost effectiveness and, again, need to be mindful about the pace of process in adopting standards. It is essential that we establish reasonable standards on which the OPUC may evaluate prudence of TE investments in order to accelerate such investments. Lastly, although cost of carbon was not specifically discussed in this work plan, we note the impact that it could have on valuation of TE programs. At this point, we do not have any specific concerns regarding TE but look forward to working collaboratively with Staff on this topic.

In summary, although PGE is generally supportive of the TE work plan, we suggest Staff consider the process these activities may require and their impact on pace and progress.

## **D. Comments Regarding Impacted Communities**

As the Commission undertakes activities to help reduce greenhouse gas emissions in accordance with the goals set forth in Executive Order 20-04, PGE welcomes the agency's workplan on Impacted Communities. PGE turns to the EO definition of impacted communities as context for our comments on this section of the workplan:

"[...] climate change has a disproportionate effect on the physical, mental, financial, and cultural wellbeing of impacted communities, such as Native American tribes, communities of color, rural communities, coastal communities, lower-income households, and other communities traditionally underrepresented in public processes, who typically have fewer resources for adapting to climate change and are therefore the most vulnerable to displacement, adverse health effects, job loss, property damage, and other effects of climate change [...]."

([https://www.oregon.gov/gov/Documents/executive\\_orders/eo\\_20-04.pdf](https://www.oregon.gov/gov/Documents/executive_orders/eo_20-04.pdf))

Meaningful engagement with these impacted communities will require traditional stakeholders to understand the effects of the historical, systemic, and continuous inequities and injustices faced by these groups.

In addition to general support for the OPUC's planned activities related to impacted communities, PGE's comments focus on two areas:

- Diversity, equity, and inclusion in the workplace; and
- Increased community engagement.

PGE welcomes the Commission's goals to expand its internal understanding of DEI in the workplace to better engage disadvantaged communities. We also look forward to building upon the innovative Senate Bill (SB) 978 public process to intentionally engage an even wider range of participants and communities. PGE is also supportive of the OPUC's plans to address the needs of low-income customers and reduce energy burden.

### ***4. Diversity, equity, and inclusion in the workplace***

PGE broadened and deepened our appreciation and understanding of the historic and systemic inequities experienced by the impacted communities we serve through our participation in the SB 978 process. The company is supportive of the OPUC's efforts to create a more diverse, equitable, and inclusive workforce, and we look forward to engaging with the OPUC DEI Program Director currently being recruited over the next year. PGE believes that a commitment to DEI is essential for an organization to thrive. As part of our commitment, PGE has joined over 900 companies in signing the Chief Executive Officer (CEO) Action for Diversity & Inclusion pledge to advance diversity in the workplace, and has committed to supporting open dialogues around DEI, sharing best practices with other companies, implementing unconscious bias training, and sharing our strategic DEI plans with our board of directors. PGE anticipates learning a great deal from the Commission as the agency expands its internal understanding of DEI in the workplace and looks forward to sharing experiences as we strive to engage our communities more meaningfully.

## ***5. Increased Community Engagement***

The EO finds that Oregon has an urgent, moral obligation to reduce our state's GHG emissions at least 45 percent below 1990 emission levels by 2035, and 80 percent below 1990 emission levels by 2050. To meet our ambitious goals, we must break through economic, cultural and linguistic barriers to ensure everyone is able to benefit from and participate in our transition to a clean energy future. We recognize that community engagement is a structural precondition for promoting social, environmental, and economic progress in Oregon. To meet these ambitious goals, we need to intentionally engage with impacted communities. As the energy industry evolves to respond to climate change, those affected by disparities must have a say in the change. The OPUC's efforts to engage communities traditionally underrepresented in public processes is aligned with PGE's value that we try to ensure all voices are heard when creating energy policies and programs that will affect everyone in our community.

Community-based organizations (CBOs) are critical to ensuring that OPUC processes and policymaking are more equitable and inclusive. Our experiences engaging with CBOs have highlighted the importance of building trust and the time and intentionality it takes to build that trust. We recognize the necessity to have diversity of voice from a variety of CBOs and other environmental justice organizations and applaud the OPUC's actions to create a DEI Program Director position to support outreach and relationship building with representatives of impacted communities, while also deepening its commitment to DEI internally.

Since our participation in SB 978, we have heightened our awareness of barriers that limit a broad range of community perspectives in stakeholder workshops, such as for the IRP public input process. We greatly appreciated the feedback received from leaders of CBOs and other environmental justice organizations during a community listening session held for the IRP. A key takeaway was that additional work is required to further develop relationships and identify other ways we can work with CBOs before expecting meaningful feedback on a topic such as PGE's IRP. These experiences have highlighted the importance of approaching engagement in fundamentally different ways to promote the inclusion of new stakeholders in energy policy discussions. We appreciate the OPUC's renewed focus on stakeholder engagement in the UM 2005 (Investigation into Distribution System Planning) docket and supporting new ways to facilitate collaborative conversations with community stakeholders. We welcome the opportunity to do our part to help center equity and create a more inclusive space in future OPUC processes.

From our perspective we've identified two barriers to meaningful community engagement. The first barrier to effective community engagement is a lack of funding to support the participation of under-represented communities. The second barrier is education and lack of translation for technical matters and how these matters impact community members. While the workplan's proposed "OPUC 101" presentation on how the agency operates could be a step to addressing the second barrier, intervenor funding could be necessary to ensure capacity building of under-represented communities. Also, additional educational webinars and trainings may be necessary to build the technical energy knowledge of communities and organizations new to energy-related issues. The OPUC could consider the development of an ongoing educational energy program offered on a repeating cadence in partnership with educational organizations to support ongoing

opportunities for communities and organizations to build capacity around energy-related issues. These issues could potentially be discussed further at the November 19, 2020, Special Public Meeting.

## ***6. Addressing Energy Burden and Low-income Customers***

PGE welcomes the opportunity to further collaborate with stakeholders to address the needs of low-income customers and to that end we anticipate supporting legislation that would give the OPUC the authority to address energy burden. The workplan also envisions the OPUC “[l]ead[ing] collaborative efforts with the ETO [Energy Trust of Oregon] to ensure ETO programs and utility programs overseen by the OPUC represent and benefit low-income electric and natural gas customers and vulnerable populations.” (page 24) PGE is open to consideration of additional or expanded ETO collaborations with Oregon Housing and Community Services (OHCS) and existing low-income weatherization programs to expand the funding and availability of no-cost whole house weatherization services as evidenced by our work to jump start the current successful Washington County/ETO pilot. PGE also has the necessary resources to communicate the benefits of any new or extended programs to our customers. PGE also endorses prioritizing work to reduce the energy burden of our customers and supports the OPUC’s plans to engage OHCS to explore potential program designs outside of traditional energy assistance (page 25).

## **E. Comments Regarding Wildfire Prevention and Mitigation**

PGE appreciates and supports the Wildfire Prevention and Mitigation approach included in the draft work plan. PGE supports the Commission's efforts to assist utilities in further developing their Wildfire Mitigation Plans and has been an active participant in its Wildfire Mitigation workshops and public meetings. In addition to actively participating in these meetings, PGE presented its wildfire mitigation plan to the OPUC in June of 2019 and presented updates to its wildfire mitigation plan for the 2020 fire season on May 21, 2020.

PGE supports the Goals and Objectives outlined in the draft Work Plan. In particular, PGE agrees that Wildfire Mitigation plans should be risk-based and based on best practices and appropriate technologies. PGE also appreciates that the Wildfire Prevention and Mitigation rules will be developed in an open, inclusive and accessible public process. PGE also supports continuing the efforts to develop and facilitate the Oregon Wildfire and Electric Collaborative and has been very active in helping plan and present in previous OWEC workshops.

PGE also supports the proposed Wildfire Mitigation Plan Rules. In addition to the rules listed, vegetation management plans will be an important part of the plan. Rules that ensure that utilities have timely access to high risk vegetation areas and will be able to remove risk trees off rights of way will be an important part of wildfire mitigation plans.

PGE supports the First Year Priority Activities listed. However, PGE has concerns about the proposed rulemaking schedule. While the draft schedule lists monthly workshops from this November through January 2021 and a Town Hall meeting in February, it does not indicate when draft rules will be posted, the comment period for the draft rules, or the timeline for the formal rulemaking process. As part of future scheduling it will be important to identify opportunities with sufficient time to comment on draft rules, the formal rulemaking timeline, when rules will be finalized and when new/updated utility wildfire mitigation plans that comport with the rules will need to be filed with the Commission.

A key element that is not included in the draft Work Plan is cost recovery of incremental Wildfire Mitigation costs. PGE appreciates the Commission's recent approval of its application for deferred accounting treatment of the costs associated with the 2020 Wildfire damage restoration (UM 2115). While future prudence review and amortization of costs caused by this unprecedented disaster is critical, this is a once in a hundred-year event.

Given the significant number of wildfire events throughout the Western United States over the last few years, there is an increased awareness of the role that utilities play in wildfire prevention, mitigation, and response. PGE understands that we have a critical role in reducing the risk of wildfires caused by electrical equipment or maintenance activities and are enhancing our wildfire mitigation plans with that goal in mind. In order to mitigate risks to the public and customers as well as promote system resiliency through the wildfire protection plans and ensuing actions, utilities will incur ongoing, incremental costs to achieve the goals set forth in their wildfire mitigation plans. The ability to recover those prudently incurred costs is crucial to utilities' ability to mitigate the risks of wildfires and protect the public.