



Portland General Electric

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Thank you for the opportunity to provide testimony on HB 2534 and the -1 Amendment on behalf of Portland General Electric. PGE is a fully integrated electric utility that serves approximately 900,000 customers representing approximately 50% of the state's population and 75% of the commercial and industrial activity in the state.

During the 2021 session, PGE supported Oregon's landmark clean electricity legislation, HB 2021, requiring PGE to eliminate the greenhouse gas emissions associated with serving our customers by 2040. We anticipate filing our combined Integrated Resources Plan and Clean Energy Plan at the Oregon Public Utility Commission at the end of March. This long-term analytical plan uses a lengthy, transparent process and results in an action plan for near term clean energy resource procurement.

We understand there is interest from stakeholders in directing the Department to develop a statewide energy strategy. We believe that a useful statewide energy strategy must:

- **Clearly articulate its purpose and priorities:** The bill calls for an energy strategy to achieve "the state's energy policy objectives," but does not state which objectives those are or what questions the strategy should answer that are not already answered by state law or existing analyses. For example, utilities already engage in regular resource planning to demonstrate how we intend to meet our decarbonization requirements, and the Oregon Global Warming Commission and ODOE will soon release a report recommending strategies and actions the state should pursue to further reduce Oregon's greenhouse gas emissions.
- **Take an economywide look at Oregon's energy future:** Washington's 2021 state energy strategy examined transportation, buildings, industry and workforce, equity, and electricity. The -1 amendment does not direct this broad focus. An energy strategy that focuses only on the utility sector - where Oregon has nationally leading decarbonization policy in place and regulatory agencies already focused on implementation - cannot be considered a holistic statewide energy strategy.
- **Not duplicate or interfere with existing planning processes that work:** As previously mentioned, regulated utilities already undertake robust analytical planning processes that include transparent stakeholder discussions and oversight by the Oregon Public Utility Commission. PGE conducts a Clean Energy Resource Plan, Distribution System Plan, and Flexible Load Plan, among others.
- **Provide opportunity for stakeholder feedback:** A robust strategy development process should require that a full draft strategy be shared with stakeholders with an opportunity for comment.
- **Be appropriately funded:** We believe this state government planning process should be funded by general fund dollars or federal grants, not through funds from utility customers through the Energy Supplier Assessment.

We appreciate the work that sponsors and proponents have put into the drafting of HB 2534 and the -1 Amendment and look forward to working with you on language to further refine this concept.