Hearings Officer,

Attached is my comment letter on PGE's Harborton Reliability Project, LU 24-041109 CU EN GW. Please ensure that it is included with any other materials or comments regarding this important project.

Randall W. Hardy Principal, Hardy Energy Consulting

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To the Hearings Officer:

My name is Randy Hardy. I have watched with interest the public dialogue around PGE's proposed Harborton Reliability Project. PGE's stated need for the project is to reliably deliver power to customers in parts of Portland under a range of conditions that could occur and cause outages as soon as in 2028. I write in support of PGE's assertion, having observed/experienced that the complexities of transmission planning are not generally well-understood, based on my past history as Administrator and CEO of Bonneville Power Administration and General Manager of Seattle City Light.

Transmission planning for future load and conditions is based on extensive modeling to determine when operations could reach or exceed the capacity of existing equipment. It's done in consideration of variables that are not static and change with the quantity and location of generation and loads currently on the system. Additionally, increasing electrification, extreme weather events, population growth in a particular area, all contribute to the planning requirements. In the case of PGE's proposed project and available materials, the need for greater capacity is driven by the increase demand for power in extreme weather scenarios that create 'peak loads'. For example, during a heat wave in August 2023, PGE customers set a record for energy demand at 4,498 MW. This project will help ensure that PGE's system is able to deliver when it matters most in future extreme weather scenarios, and that PGE is operating in accordance with the very real and enforceable regulations imposed by the Federal Energy Regulatory Commission and National Electricity Reliability Corporation. It would be negligent for PGE to operate its system without regarding the limits and meeting these fundamental reliability standards.

Another aspect of transmission planning is determining where the electrons can flow, and what equipment may be used and/or necessary. Those opposing the Harborton Reliability project argue that NW Marina Way is a viable alternative to the proposed project. Some have pointed to the presence of existing electrical poles and lines as validation. I would point to the existing easements in Forest Park and the existing lines. Upgrading those lines and utilizing the existing easements is by far the lowest cost and least impactful to the environment. Keeping PGE costs as low as possible is particularly important as PGE retail rates have increased by nearly 50 percent in the last four years.

Lastly, transmission capacity is desperately needed across the Northwest to meet the growing demands of society and specifically the need for PGE to comply with Oregon requirements to decarbonize its generation resource base by 80 percent in 2030. BPA and PGE have been working together to find the best solutions, meet these State requirements and minimize the costs and impacts to all customers. I work closely with both parties and know that they are committed to doing what is right for everyone living in the Portland area. Forest Park is a vital part of Portland, but the original plans called for keeping the transmission in this corridor and agreements were reached many years ago. I ask that you do what is right for all of Portland and keep the transmission lines in the corridor and minimize the impact to the environment and the greater area.

Regards,

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