

March 27, 2024

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
P.O. Box 1088  
201 High Street S.E., Suite 100  
Salem, OR 97308-1088

**Re: Docket No. PCN 6 – Portland General Electric Company’s Notice of Intent to File a Petition for Certificate of Public Convenience and Necessity.**

Attention Filing Center:

Portland General Electric Company (PGE or the Company) hereby provides notice to the Public Utility Commission of Oregon (Commission) of its intent to file a Petition (Petition) for a Certificate of Public Convenience and Necessity (CPCN) authorizing construction of an overhead, 115-kilovolt (kV) transmission line totaling 7.4 miles in length and located primarily within Clackamas County, between the existing Rosemont and Wilsonville Substations (the Rosemont-Wilsonville Line). ORS 758.015 requires utilities proposing to construct transmission lines to petition the Commission for a CPCN if a transmission line will necessitate condemnation of land or an interest therein. It is PGE’s plan to file the Petition, with supporting testimony in April 2024, requesting issuance of an order approving the CPCN no later than March 14, 2025.

**The Rosemont-Wilsonville Line.** The Rosemont-Wilsonville Line is a 115-kV line composed of monopole structures, which will be built by adopting a combination of approaches to maximize the use of existing rights-of-way. These approaches include converting single-circuit transmission line into double-circuit transmission line, overbuilding existing distribution circuits, and reconfiguring part of an existing transmission line. The new construction portion of the line starts at Rosemont Substation and double-circuits with the existing Meridian-Rosemont 115-kV line until the roundabout at Borland Road, which is a distance of approximately 1.4 miles. From Borland Road the new construction portion of the line then transitions to the installation of new 115-kV structures along the existing Rosemont-Mossy Brae 13-kV distribution feeder right-of-way for approximately 0.3 miles. New structures will be constructed for the next 0.3 miles where there are not currently any electrical lines and a new Oregon Department of Transportation (ODOT) approval to cross the Interstate 205 Freeway is included along this segment. Next, new 115-kV structures will again utilize the existing Meridian-Meridian 13 and Wilsonville-Boeckman 13-kV distribution rights-of-way for approximately 3.0 miles. Finally, the line will tie into the existing idled McLoughlin-Wilsonville 115-kV line for 2.4 miles until it connects to the Wilsonville Substation.

**The Resource Need.** The Rosemont-Wilsonville Line is critical to ensure the Company’s ability to provide adequate and reliable energy services to its customers in the rapidly growing

southern portions of PGE's western and central service territories. In particular, the line is needed to accommodate existing and anticipated load growth due to investments in semiconductor manufacturing, general commercial and residential growth, and expected public infrastructure.

Importantly, the Rosemont-Wilsonville Line will accommodate new load from essential public infrastructure. The growing population in Hillsboro has increased the need for drinking water supplied to the area, and in response, the Willamette Water Supply Program (WWSP) is in the process of building a new water treatment plant off of SW Tualatin-Sherwood Road on property that is now in the City of Sherwood. Operation of this water treatment plant will require approximately 11.8 megavolt-amperes (MVA) of electricity, possibly as soon as July 2025, which represents a substantial increase to the total electricity delivered by PGE in the area. The Rosemont-Wilsonville Line, as one of the transmission facilities of the Tonquin Project, is necessary to help accommodate the significant new load from the water treatment plant, which is crucial public infrastructure for the Beaverton, Hillsboro, and Tualatin Valley Water District service areas. Construction of the new water treatment plant is essential to the new Willamette Water Supply System (WWSS), which when complete, will be one of Oregon's most seismically-resilient water systems—built to better withstand natural disasters, protect public health, and speed regional economic recovery through restoring critical services more quickly in the event of a disaster. The Rosemont-Wilsonville Line must be in service as soon as possible after the water treatment plant begins operating in order to ensure reliable service to the service areas of Tualatin, Sherwood, Wilsonville, West Linn, Lake Oswego, and unincorporated areas of Clackamas County and Washington County.

Without the Rosemont-Wilsonville Line, the Company has modeled multiple double loss outage scenarios resulting in significant overloads of transmission lines in the surrounding areas. The models show that ameliorative actions such as switching substations to alternate sources or adjusting generation patterns are not sufficient to protect against overload—only direct shedding or curtailing of customer loads bring the transmission facilities within rated limits. In short, the Rosemont-Wilsonville Line is needed to ensure reliability of the transmission systems in the service areas of Tualatin, Sherwood, Wilsonville, West Linn, Lake Oswego, and unincorporated areas of Clackamas County and Washington County by adding additional high-capacity bulk electric facilities designed with the most up-to-date engineering standards and increasing the available load serving capability in the area.

**Permitting of the Rosemont-Wilsonville Line.** The Company has been diligently working with all regulatory authorities to obtain required land use permits and approvals for the Rosemont-Wilsonville Line. However, special circumstances have delayed PGE's permitting efforts in Clackamas County such that the Company still needs to obtain a land use permit and Right-of-Way Permit from the County.

**The Petition for a CPCN for the Rosemont-Wilsonville Line.** PGE will be submitting its Petition prior to obtaining the outstanding permits and approvals from Clackamas County due to scheduling constraints. To begin construction, the Company will need access to the affected parcels. PGE already has obtained the necessary easements for approximately 5.84 miles of the line, or 78 percent, and is continuing to negotiate with landowners in good faith to obtain easements. However, the Company anticipates it may need to initiate condemnation proceedings to gain access to certain parcels along the route for the Rosemont-Wilsonville Line, and PGE must first obtain a CPCN before initiating condemnation. While condemnation is not the Company's preferred path and the Company will continue to negotiate in good faith with landowners to avoid condemnation wherever possible, PGE must initiate the CPCN proceeding to ensure that it will have the necessary access.

Given the fact that recent CPCN proceedings have required approximately nine months to complete, PGE has concluded that it cannot delay filing the Petition for CPCN until it has received the land use approvals from Clackamas County. Accordingly, PGE plans to file a Request for Waiver of OAR 860-025-0030(3) concurrently with the Petition.

It should be noted that the Company's request in this case does not eliminate or circumvent any approval processes associated with the Rosemont-Wilsonville Line, but rather allows the processes to run concurrently to ensure the transmission line can be energized by the December 31, 2025 in-service date.

The Petition will be filed in accordance with the Commission's CPCN rules, OAR 860-025-0030, OAR 860-025-0035, and OAR 860-025-0040.

Finally, the Company is also mailing a copy of this notice of intent to all landowners for which condemnation may be necessary informing them of PGE's plan to file a Petition with instructions on how to participate in the upcoming proceeding. A copy of the customer communication is attached.

Please address correspondence on this matter to the following:

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If you have any questions about this notice filing, please do not hesitate to contact me.

Respectfully submitted,



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Enclosure