Oregon Environmental Council

October 13, 2026

Land Use Hearings Office, City of Portland
Case File, LU 26-051203 CU EN GW, PC # 26-010241

RE: Oregon Environmental Council Comments on PGE's Harborton Reliability Project

Dear City of Portland Land Use Hearings Officer,

Thank you for the opportunity to comment on Portland General Electric's Harborton Reliability Project.[1] For nearly 60 years, Oregon Environmental Council has been at the forefront of advocating to protect Oregon's natural resources. As a non-profit, non-partisan environmental advocacy organization, we attempt to evaluate policies and projects through a multi-issue lens.

It is through this multi-issue lens that we approach these comments and write in support of this project, given significant new commitments for Forest Park restoration, ecological enhancements, wildfire resilience, and access improvements, reflecting feedback from stakeholders while maintaining the project's core reliability benefits. However, our support is contingent on PGE making good on its commitments and the City of Portland implementing appropriate accountability mechanisms to ensure these are not paper agreements but tangible outcomes and benefits to Forest Park and the natural and human resources this project impacts.

OEC understands we have not commented on nor engaged in this project to date. We understand this is a sensitive time to weigh in, and we do so fully acknowledging our limited context. However, we are called to support this project for several reasons:

1. **We need to upgrade and build more transmission to achieve our regional reliability needs and clean energy mandates.** In 2025, OEC helped pass Oregon House Bill 3336, a landmark law requiring investor-owned utilities like PGE to evaluate and integrate Grid Enhancing Technologies (GETs) and advanced transmission strategies to boost grid capacity and reliability.[2] Replacing legacy transmission wires - as PGE plans to do with one line on this project - with advanced reconductoring to deliver more electricity is exactly the type of project this GETs legislation is intended to advance. According to the Oregon Department of Energy, getting more capacity out of existing lines and building new transmission is an essential recommendation to meet our state's energy needs and clean energy goals.[3] Moreover, regional electricity demand is projected to grow by more than 40% over the next decade, according to PNUCC's 10-year forecast and the Northwest Power and Conservation Council's preliminary

[1] Case File, LU 26-051203 CU EN GW, PC # 26-010241
[2] https://olis.oregonlegislature.gov/liz/2025r1/Measures/Overview/HB3336
[3] https://energystrategy.oregon.gov/framework-transm

20-year outlook.[4] A study by E3, commissioned by the Public Generating Pool and other Northwest utility sponsors, projects a resource adequacy gap of roughly 9 GW of effective capacity by 2030 - roughly the size of Oregon's current overall generating load and capacity.[5] This grows to 14-18 GW by 2035. We need all cost-effective transmission projects to mitigate real reliability concerns facing our region. Transmission can help Oregon build and deliver a portfolio of clean energy solutions - including wind, solar, and storage - while minimizing our need to rely on fossil fuels to meet this reliability challenge.

2. **At this point, alternative routes are either not sufficient, potentially more costly, or would take too long to avoid outages in North and Northwest Portland as soon as 2028.** Long-term and even short-term power outages can have significant impacts on public health, economic development, and our climate. From residents losing power to medical devices to households turning to polluting heating or cooling sources like diesel- and gas-fueled backup generators, power outages can be costly to communities and individuals. OEC does not have enough information to determine whether PGE's evaluation of alternative routes is fully accurate, and we have heard concerns from stakeholders that PGE did not appropriately plan for or evaluate these alternatives.[6] However, we do know that further delay to this project carries serious risks and should move forward for these reasons.
3. **PGE has put forward a compelling $5.5 million offer for environmental mitigation, ecological enhancement and conservation, and wildfire resilience projects within and adjacent to Forest Park.** According to PGE's Harborton Reliability Project FAQ, "The City can use the resources to do high-priority and enhancement projects like those outlined in the Restore Forest Park Initiative. These include removing harmful weeds, invasive plants, and wildfire fuels from hundreds of acres of the park. The funds could also be used to improve forest habitat, improve wetlands for red-legged frog breeding areas, and help acquire, protect, and add over 20 acres of higher-value habitat to the northern part of the park. Funds could also help the city buy property that has higher-value habitat to add to the northern part of Forest Park. For every acre affected by the project, more than 200 acres in the park could be improved. In all, this funding could improve about 1,000 acres of the park."[7] We understand other stakeholders have advocated for more funding for activities with a clear net ecological benefit for Forest Park.[8] OEC believes reasonable funding should be applied in a way that supports these stakeholders' recommendations while balancing ratepayer affordability concerns. The City should require regular independent and transparent project updates along with ecological impact analysis.

Looking ahead to phase 4 and phase 5 of this project, OEC recommends PGE and the City incorporate these elements into planning processes.

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[4] https://www.nwcouncil.org/news/2025/07/24/pnucc-northwest-regional-forecast-update-july-2025/
[5] https://www.ethree.com/e3-projects-substantial-capacity-shortfall-in-the-pacific-northwest/
[6] https://portlandgeneralprojects.com/wp-content/uploads/2024/10/PGE_Harborton_EvaluatedAlternatives_V3-1.pdf
[7] https://portlandgeneralprojects.com/wp-content/uploads/2026/09/PGE_Harborton_FAQ_V3.pdf
[8] https://drive.google.com/file/d/1P17exhQGnQz7nbOuoxrJx1J4PzEP5bwG/view?usp=sharing

- **Leverage independent, technical project review into planning processes.** We are encouraged to learn that phase 3 funding "will be applied for an independent technical consultant to support future planning discussions between the City and PGE concerning utility infrastructure in Forest Park."[9] Ideally, this consultant will produce a report on why, when, and how decisions were made.
- **Impacted stakeholders must be at the table at the start of and throughout planning conversations and negotiations.** This list of stakeholders may include but not be limited to NGO intervenors (Bird Alliance, Forest Park Conservancy, and Forest Park Neighborhood Association), ratepayer advocates (Citizens Utility Board), and scientific experts who can weigh in on the ecological impacts of future development.
- **Ideally, PGE can pursue alternative routes to delay or mitigate further development in Forest Park.** OEC is especially supportive of PGE scaling energy efficiency, demand response, and distributed energy resources that can be added to its robust Virtual Power Plant program for this purpose.[10] We also recommend PGE explore front-of-the-meter battery storage near the Harborton substation.

Thank you for the opportunity to comment, and we appreciate all the time and effort stakeholders have put into this important process and project.

Sincerely,

Ben Brint
Senior Climate Program Director
Oregon Environmental Council

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9 https://www.portland.gov/ppd/zoning-land-use/news/2026/7/9/city-portland-pge-reach-agreement-following-mediatiois.

10 https://portlandgeneral.com/blog/virtual-power-plant-supports-grid-reliability