



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

October 17, 2012

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

RE: **UM 1535**

Attention Filing Center:

Please find enclosed the original and 2 copies of **Portland General Electric Company's Reply to Northwest and Intermountain Power Producers Coalition's Response to Troutdale Energy Center's Request for Hearing** to be filed in the above-referenced docket.

This filing is being made electronically and via U.S. mail with the Filing Center. An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Quisha Light".

Quisha Light
Regulatory Paralegal

Enclosures
cc: UM 1535 Service List



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
(503) 464-7181 • Facsimile (503) 464-2200

V. Denise Saunders
Associate General Counsel

October 17, 2012

Via Electronic Filing and U.S. Mail

Public Utility Commission of Oregon
550 Capitol Street N.E., Suite 215
Salem, Oregon 97301-2551

**RE: Reply to Northwest and Intermountain Power Producers Coalition's
Response in Support of Troutdale Energy Center
(Portland General Electric, Docket UM 1535)**

Dear Commissioners:

We are sending this letter as a response to the October 12, 2012 correspondence that you received from the Northwest and Intermountain Power Producers Coalition ("NIPPC") regarding UM 1535. NIPPC's referenced correspondence was in support of a submittal you also received from Troutdale Energy Center ("TEC") on Oct 5, 2012, also in reference to UM 1535 (the TEC letter).

On October 12, 2012, PGE submitted to the Commission its responses to the points raised by TEC, which we believe cover all but one point later raised in the NIPPC correspondence. Specifically, NIPPC claims that "PGE has utilized its other rate-payer funded gas storage assets to secure a preferential gas storage contract for its benchmark." This is patently false. PGE's Owner's Costs show that the Port Westward II plant independently meets the NW Natural threshold natural gas storage capacity requirement. NIPPC's representatives have had access to the Owner's Costs under the Protective Order and should not mislead the Commission on this point.

Further, as the TEC letter indicates, TEC, like PGE, has been offered a similar opportunity to acquire NW Natural firm natural gas storage capacity and has chosen not to pursue this opportunity.

For all of the reasons set forth in our October 12th letter, we continue to urge the Commission not to revisit these issues again.

October 17, 2012
Page 2

Respectfully Submitted,

Denise Saunders for
V. Denise Saunders

V. DENISE SAUNDERS
Associate General Counsel
Portland General Electric
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
Phone: (503) 464-7181
Fax: (503)-464-2200
denise.saunders@pgn.com

VDS:qal
cc: UM 1535 Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S (PGE) REPLY TO NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION'S RESPONSE IN SUPPORT OF TROUTDALE ENERGY CENTER** to be served by electronic mail and by First Class U.S. Mail, postage prepaid and properly addressed, to those parties on the attached service list for OPUC Docket UM 1535.

Dated at Portland, Oregon, this 17th day of October, 2012.



Quisha Light
Regulatory Paralegal
PORTLAND GENERAL ELECTRIC COMPANY
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(541) 464-8866 (telephone)
(503) 464-2200 (telecopier)
quisha.light@pgn.com

**SERVICE LIST 10/17/12
OPUC DOCKET # UM 1535**

Matt Krumenauer, Senior Policy Analyst (C) OREGON DEPARTMENT OF ENERGY Matt.krumenauer@state.or.us	Vijay A. Satyal, Senior Policy Analyst (C) OREGON DEPARTMENT OF ENERGY vijay.a.satyal@state.or.us
Harold T. Judd ACCION GROUP, INC. hjudd@acciongroup.com	J. Laurence Cable (C) CABLE HUSTON BENEDICT, ET AL lcable@cablehuston.com
Richard Lorenz (C) CABLE HUSTON BENEDICT, ET AL rlorenz@cablehuston.com	Gordon Feighner (C) CITIZENS' UTILITY BOARD gordon@oregoncub.org
G. Catriona McCracken (C) CITIZENS' UTILITY BOARD catriona@oregoncub.org	Bob Jenks (C) CITIZENS' UTILITY BOARD bob@oregoncub.org
Irion Sanger (C) DAVISON VAN CLEVE mail@dvclaw.com	S. Bradley Van Cleve (C) DAVISON VAN CLEVE mail@dvclaw.com ; bvc@dvclaw.com
Janet L. Prewitt, Assistant AG (C) DEPARTMENT OF JUSTICE NATURAL RESOURCES SECTION Janet.prewitt@doj.state.or.us	John W. Stephens ESLER STEPHENS & BUCKLEY stephens@eslerstephens.com mec@eslerstephens.com
Wendy Gerlitz, (C) NW ENERGY COALITION wendy@nwenergy.org	Robert D. Kahn NW INDEPENDENT POWER PRODUCERS COALITION rkahn@nippc.org ; rkahn@rdkco.com
Erik Colville (C) OREGON PUBLIC UTILITY COMMISSION erik.colville@state.or.us	Stephanie S. Andrus, Assistant AG (C) DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION stephanie.andrus@state.or.us
Donald W. Schoenbeck (C) REGULATORY & COGENERATION SERVICES, INC. dws@r-c-s-inc.com	Megan Walseth Decker RENEWABLE NW PROJECT megan@rnp.org
Jimmy Lindsay RENEWABLE NW PROJECT jimmy@rnp.org	Gregory M. Adams (C) RICHARDSON & O'LEARY greg@richardsonandoleary.com
Peter J. Richardson (C) RICHARDSON & O'LEARY peter@richardsonandoleary.com	Chuck Sides TEPPER, LLC chucksides@mgoregon.com