

ELLEN F. ROSENBLUM
Attorney General



MARY H. WILLIAMS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

October 11, 2012

VIA EMAIL AND U.S. MAIL

Attention: Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE, #215
PO Box 2148
Salem, OR 97308-2148
puc.filingcenter@state.or.us

Re: *In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Finance Application*
(\$400M Revolving Credit)
PUC Docket No.: UF 4272
DOJ File No.: 860115-GB0471-12

Enclosed for filing are an original and one copy of Motion to Modify Order in the above-captioned docket for filing with the PUC today.

Sincerely,

Jeffery R. Seeley
Legal Secretary
Natural Resources/Business Activities Sections

Enclosures
JRS:jrs/#3683457
c: UF4272 Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UF 4272**

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC
6 COMPANY

7 Finance Application (\$400M Revolving
8 Credit).

MOTION TO MODIFY ORDER

9 Pursuant to ORS 756.568, Staff of the Public Utility Commission of Oregon (Staff) asks
10 the Commission to amend Order No. 12-279 to provide for costs associated with Order No. 12-
11 279, in which the Commission authorized Portland General Electric Company (PGE) to enter
12 into a revolving credit agreement for a term of up to five years in an amount up to \$400 million
13 and authorized PGE to ask banks to issue letters of credit under the agreement. The
14 Commission's order describes fees that may be paid by PGE to the agent and participating banks
15 under the credit agreement.

16 When applying for authority to enter into the credit agreement, PGE inadvertently
17 omitted any reference to a fronting fee that is to be paid to a bank for issuing a letter of credit
18 under the credit agreement. (See October 1, 2012 Letter from James Warberg of PGE to
19 Commission Filing Center.) The fronting (or issuing) fee is intended to cover the administrative
20 cost of issuing and maintaining the letter of credit. PGE reports that under the credit agreement,
21 PGE will pay a fronting fee not to exceed 0.20% per annum of the amount of each letter of credit
22 issued under the facility. (See October 1, 2012 Letter from James Warberg to Commission
23 Filing Center.)

24 In its October 1, 2012 letter, PGE asks the Commission to acknowledge that the fronting
25 fees described above are allowed under the Commission's order. Staff agrees with PGE that the
26 fees are appropriately included in the credit agreement and that such fees are reasonable.

1 Staff asks that the Commission address the omission of the fees by amending the order by
2 appending an additional paragraph to condition No. 4¹ shown in italic:

- 3
4 4. Each participating bank's one-time upfront fee may not exceed 60 bps of
that bank's initial commitment amount.

5 *In addition, LC Fronting fees shall not exceed 0.20% per annum of the*
6 *amount of each LC issued and outstanding under the credit facility and shall*
7 *not exceed \$825,000 in aggregate annually. The Company will demonstrate*
that the resulting all-in cost of LCs is market competitive.

8 PGE has reviewed amended condition No. 4 above and agrees it addresses all needed changes.

9
10 DATED this 11th day of October 2012.

11 Respectfully submitted,

12 ELLEN F. ROSENBLUM
13 Attorney General

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15 _____
Stephanie S. Andrus, #92512
16 Senior Assistant Attorney General
17 Of Attorneys for Staff of the Public Utility
Commission of Oregon

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¹ Order No. 12-279 includes eleven conditions.

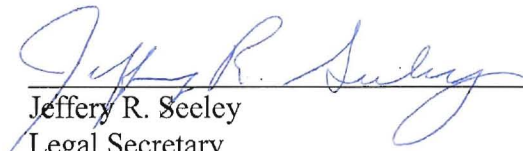
CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2012, I served the foregoing MOTION TO MODIFY ORDER upon the persons named on the service list below who have waived such service by mail, by serving a full, true and correct copy thereof at their e-mail address as follows:

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Jeffery R. Seeley
Legal Secretary
Natural Resources/Business Activities Sections