



Portland General Electric Company
Legal Department
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V. Denise Saunders
Associate General Counsel

May 7, 2015

Via Electronic Filing

Oregon Public Utility Commission
Attention: Filing Center
PO Box 1088
Salem OR 97308-1088

Re: LC 56 – Portland General Electric Company’s Motion for Extension of Time to Report Results of CAISO EIM Cost-Benefit Study

Attention Filing Center:

Enclosed for filing in the above-referenced docket is Portland General Electric Company’s (“PGE”) *Motion for Extension of Time*, to be electronically filed on May 7, 2015 with the Oregon Public Utilities Commission.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "V. Denise Saunders". The signature is written in a cursive, flowing style.

V. DENISE SAUNDERS
Associate General Counsel

VDS:bop

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. LC 56

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY'S

2013 Integrated Resource Plan.

**PORTLAND GENERAL ELECTRIC
COMPANY'S**

**MOTION FOR EXTENSION OF TIME
TO REPORT RESULTS OF CAISO
EIM COST-BENEFIT STUDY**

Portland General Electric Company (PGE) respectfully requests that the time for reporting the results of its cost-benefit analysis of joining the CAISO EIM be extended from June 30, 2015 to the fourth quarter of 2015 (i.e., October 1, 2015 – December 31, 2015).¹ In support of this motion, PGE states the following:

1. PGE is making tangible progress on its cost-benefit analysis activities. Since Order No. 14-415 was issued on December 2, 2014, PGE has established an EIM Study Advisory Committee (EIMSAC) and conducted three meetings with the group. Additionally, PGE has established a Technical Review Committee (TRC). TRC members are invited to all EIMSAC meetings, and PGE also coordinates with the TRC to review modeling scenarios and assumptions. PGE is also coordinating with peer utilities on base case assumptions for our modeling efforts and as of late April, we have completed initial base case runs for the day-ahead and hour-ahead portion of our studies. Completing and validating a full base case run (day-ahead, hour-ahead and within-hour) is one of the most time-consuming portions of our modeling efforts. We plan to complete validation of our base case runs by the end of May.

¹ In order to fully compare its within-hour options, PGE is also concurrently studying the cost and benefits of joining the Northwest Power Pool (NWPP) Market Assessment and Coordination Committee (MC) Initiative.

2. As a result of the base case work described above, completing cost-benefit analyses by June 30, 2015 proved to be unworkable. As PGE consulted with peer utilities and its selected consultant (E3 Consulting), we learned that it was not possible for E3 Consulting to complete its analyses by June 30, 2015. We sought feedback from our committees (i.e., EIMSAC and TRC) on a revised schedule with studies finishing in September. We received no objections to this later date for results. In establishing a range of time to report results to the Commission (i.e., the fourth quarter of 2015), PGE seeks to manage its reporting timeline to ensure report results are shared with the Commission as soon as reasonably possible. The extension sought balances PGE's desire to provide timely results with its need to ensure the results are complete.
3. PGE understands the importance of continuing to make (and communicate) measurable progress against our aggressive study timeline. To that end, PGE plans to provide an update on our study progress to the Commission on July 6, 2015. PGE's update will be a part of its scheduled IRP workshop.
4. An extension will not delay NWPP MC Initiative decisions or PGE's 2016 IRP filing.
5. PGE has consulted with the following parties and none of them expressed any objection to this filing: Commission Staff, Citizens' Utility Board, Industrial Customers of Northwest Utilities, and Renewable Northwest.

For the reasons set forth above, PGE respectfully requests that the Commission extend the time for reporting the results of its cost-benefit analysis of joining the CAISO EIM (including our concurrent study of the NWPP MC Initiative) to the fourth quarter of 2015.

DATED this 7th day of May, 2015.

Respectfully submitted,



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