



Portland General Electric Company
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Loretta I. Mabinton
Associate General Counsel

September 17, 2013

Via Electronic Filing and U.S. Mail

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

Re: LC 56 - In the Matter of Portland General Electric Company, 2013 Integrated Resource Plan


Attention Filing Center:

Enclosed for filing in LC 56 are an original and one copy of Portland General Electric Company's **Motion for Extension of Time to File Integrated Resource Plan and for Waiver of the Annual Update Filing (OAR 860-027-0400(8))**.

This document is also being filed by electronic mail with the Filing Center and served electronically upon the LC 56 service list.

Thank you in advance for your assistance.

Sincerely,


Loretta I. Mabinton
Associate General Counsel

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Enclosures
cc: Service List-LC 56

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

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 FILE INTGRATED RESOURCE
PLAN & FOR WAIVER OF THE
ANNUAL UPDATE FILING (OAR 860-
027-0400(8))**

Pursuant to OAR 860-027-0400(3), Portland General Electric Company (PGE) respectfully requests an additional extension of time in which to file its 2013 Integrated Resource Plan ("IRP"). Specifically, PGE requests that the time for filing be extended from November 23, 2013, to March 30, 2014. In addition, PGE requests a waiver of the requirement in OAR 860-027-0400(8), which states that "[e]ach energy utility must submit an annual update on its most recently acknowledged IRP. . . on or before the acknowledgment order anniversary date." In support of this motion, PGE states the following:

1. PGE's 2009 IRP was acknowledged with requirements by the Commission on November 23, 2010. As required by OAR 860-027-0400(8), PGE submitted an annual update on November 23, 2011 and a second update on November 22, 2012.

2. OAR 860-027-0400(3) requires PGE to file its next IRP within two years of its 2009 IRP acknowledgment order. However, the rule also provides that "if an energy utility does not intend to take any significant resource action for at least two years after its next IRP is due, the energy utility may request an extension of its filing date from the Commission."

3. On February 13, 2012, the Commission granted PGE an extension of time to file its next IRP, until November 23, 2013. *See* Order No. 12-043. In support of that extension, PGE advised the Commission that 1) it would not be taking any new significant resource actions before 2016, but will focus on acquiring the resources identified in its 2009 IRP; and 2) an extension of time would give PGE the opportunity to incorporate the results of its RFPs into its next IRP analysis.

4. PGE's request for an additional extension of time remains consistent with the Commission's IRP rules and in the public interest, because PGE does not intend to take any new significant resource actions for at least two years or before 2016 and, as discussed below it will allow PGE time to receive additional input from stakeholders and potentially incorporate information about new transmission arrangements with the Bonneville Power Administration ("BPA") into the IRP.

5. Since the Commission granted the first request for extension, PGE has conducted 3 public meetings and 3 technical workshops, and has worked diligently, with the assistance of stakeholders and the public on its IRP. At PGE's August 29, 2013 public meeting, stakeholders requested that we hold an additional technical workshop to further explore potential studies, research, and analyses that might be added to PGE's action plan to address future issues regarding storage, demand response, distributed solar generation, and flexibility requirements associated with variable renewables. Stakeholders further requested that PGE examine additional resource portfolios and CO₂ futures. An extension of time for filing the IRP will allow PGE time to receive additional input towards these potential studies and research initiatives that may inform future IRPs.

6. An extension would also give PGE more time to potentially complete a new transmission deal with BPA.

7. PGE understands the importance of filing its IRP in a timely manner. To that end, PGE will make its draft IRP available by November 23, 2013, to insure that sufficient time is provided for stakeholder review.

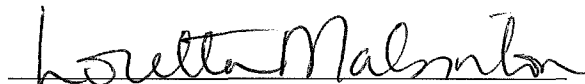
8. Moreover, because PGE will be making its new draft IRP available in November and filing the final IRP plan by March 30, 2014, the Company requests that the Commission waive the annual update filing for its 2009 IRP required by OAR 860-027-0400(8).

9. PGE has consulted with the following parties and none of them expressed any objection to this filing: Commission Staff, Oregon Department of Energy, Citizens' Utility Board, Industrial Customers of Northwest Utilities, and Renewable Northwest Project.

For the reasons stated above, PGE moves the Commission for an Order extending the IRP filing deadline to March 30, 2014 and waiving the filing of the annual IRP update for its 2009 IRP required by OAR 860-027-0400(8).

DATED this ___ day of September, 2013.

Respectfully submitted,

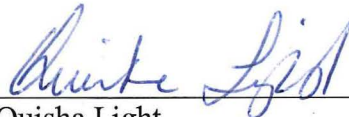


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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **Portland General Electric Company's Motion for Extension of Time to File Integrated Resource Plan and for Waiver of the Annual Update Filing (OAR 860-027-0400(8))** to be served by electronic mail to those parties whose email addresses appear on the attached service list from OPUC Docket No. LC 56.

Dated at Portland, Oregon, this 17th day of September, 2013.



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OPUC DOCKET # LC 56**

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