



Portland General Electric Company
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PortlandGeneral.com

May 27, 2014

Email / US Mail

puc.filingcenter@state.or.us

Oregon Public Utility Commission
Attn: Filing Center
3930 Fairview Industrial Dr. SE
PO Box 1088-97308-1088

RE: UM 1673 - PGE's Comments HB 2893 Solar Incentive Report to Legislature

Filing Center:

Portland General Electric encloses Comments to be filed today in the above-referenced docket. An electronic copy of this filing will be provided to all parties on the UM 1673 service list.

If you have any questions or require further information, please call me at (503) 464-8718. (Please direct all formal correspondence and requests to the following email address: pge.opuc.filings@pgn.com.)

Sincerely,

A handwritten signature in black ink that reads "Karla Wenzel". The signature is written in a cursive, flowing style.

Karla Wenzel
Manager, Pricing & Tariffs

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1673

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC COMPANY,)	PORTLAND GENERAL ELECTRIC'S COMMENTS
)	
Public Utility Commission Legislature Report to Comply with HB 2893)	
)	

Thank you for the opportunity to provide comments into the Draft Report to the Legislature regarding effectiveness of solar programs in Oregon. PGE appreciates the balanced approach reflected in the draft.

HB 2893 requires that the Commission “make recommendations for modifying the programs or establishing new programs for the purpose of providing incentives for the development of solar photovoltaic energy systems in a manner that is cost effective and protects ratepayers, including ratepayers that do not participate in the programs.” PGE is uncertain whether the policy issues identified in Chapter 7 of the report (recovery of utility fixed costs, integrating distributed solar reliably through use of smart inverters, and reducing soft costs) were intended by the Commission to be viewed as recommendations for future programs or policies that the legislature could investigate. To the extent that the Commission intends those issues to receive further review by the legislature, PGE believes that the narrative in Chapter 7 should be recast to make that intention more explicit. In doing so, we believe that the mandate required by HB 2893 would be met.

Again, PGE appreciates the opportunity to comment and looks forward to continued participation in this docket.

These comments are respectfully submitted by:

A handwritten signature in black ink, appearing to read "Karla Wenzel". The signature is written in a cursive style and is positioned above a horizontal line.

Karla Wenzel, Portland General Electric

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UM 1673.

DATED at Portland, Oregon, this 27th day of May, 2014.



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**SERVICE LIST
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