

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

3 UM 1683

4 In the Matter of

5 In the Matter of PORTLAND GENERAL
6 ELECTRIC

7 Renewable Portfolio Standard Implementation
8 Plan 2015-2019

MOTION TO WAIVE OAR 860-001-0350(7)(a)
EXPEDITED CONSIDERATION REQUESTED

9 The Public Utility Commission of Oregon Staff (“Staff”), the Citizens’ Utility Board of
10 Oregon (“CUB”), Portland General Electric (“PGE” or “Company”), Renewable Northwest
11 (“RNW”), and Industrial Customers of Northwest Utilities (“ICNU”), and the Oregon
12 Department of Energy (“ODOE”) (collectively “the Parties” and individually a “Party”) file this
13 motion under OAR 860-001-0000(2) for waiver of the requirement contained in OAR 860-001-
14 0350(7)(a) to file an explanatory brief or supporting testimony with a settlement agreement.

15 PGE filed its 2015-2019 Renewable Portfolio Standard Implementation Plan (the 2015-
16 2019 RPIP) on December 31, 2013 and on February 18, 2014 the Company filed an updated
17 2015-2019 RPIP containing a non-confidential summary of the Company’s incremental cost of
18 RPS compliance. All Parties reviewed the Company’s 2015-2019 RPIP and all Parties agree that
19 the 2015-2019 RPIP shows PGE is positioned to be in compliance with Oregon’s renewable
20 portfolio standard (RPS) requirements contained in ORS 469A.052.

21 The Parties have reached a settlement in which all Parties except ICNU support
22 acknowledgment of the 2015-2019 RPIP; ICNU does not oppose acknowledgment of the 2015-
23 2019 RPIP. OAR 860-001-0350(7) directs parties to a settlement to file, concurrent with the
24 written stipulation, an explanatory brief or written testimony. In this case, no Party has raised
25 any issue with the accuracy or substance of the 2015-2019 RPIP. The only issues resolved by
26 settlement are that the 2015-2019 RPIP is compliant and relate to conditions imposed on PGE

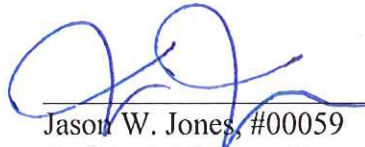
1 with regard to future renewable portfolio standard implementation plans (RPIP). This condition
2 is set forth in the stipulation and requires PGE to include in future RPIPs a scenario under the
3 reference case assumptions where the Company continues its use of unbundled renewable energy
4 credits.

5 Given that the stipulation speaks for itself in this instance, the Parties respectfully request
6 the Commission grant this waiver of the Commissions' rule requiring the concurrent filing of an
7 explanatory brief or written testimony in support of the stipulation. The stipulation sets forth a
8 summary of the Company's 2015-2019 RPIP and an explanation of the additional condition for
9 future RPIPs requested by Staff. Given the non-controversial nature of the 2015-2019 RPIP and
10 straight-forward conditions requested for future RPIPs, the Commission has adequate
11 information to approve the stipulation and acknowledge the Company's 2015-2019 RPIP without
12 the need for an explanatory brief or written testimony in support of the stipulation.

13 For these reasons, the Parties respectfully request that the Commission waive the
14 requirements of OAR 860-001-0350(7) and allow the Parties to file the stipulation settling
15 docket UM 1683 without an explanatory brief or written testimony. Given the short time period
16 between the filing of the stipulation and Commission resolution of the 2015-2019 RPIP, the
17 Parties request expedited consideration of this motion.

18 DATED this 13th day of June 2014.

19 Respectfully submitted,

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21 _____

22 Jason W. Jones, #00059
23 Assistant Attorney General
24 Of Attorneys for Staff of the Public Utility
25 Commission of Oregon
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1 **CERTIFICATE OF SERVICE**

2 I certify that on June 13, 2014, I served the foregoing Motion upon all parties of record in
3 this proceeding by delivering a copy by electronic mail only as all parties waive paper service.

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17 **W**
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