



Portland General Electric Company

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Richard George
Assistant General Counsel

July 28, 2014

Via Electronic Filing and U.S. Mail

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

Re: UM 1690 - Voluntary Renewable Energy Tariff
Portland General Electric Company's Erratum to Comments on Staff VRET Models

Attention Filing Center:

Please find enclosed the original and three (3) copies of Portland General Electric Company's ("PGE") Erratum to its Comments on Staff's VRET Models. PGE inadvertently included a copy of the table, which was fragmented and did not include all columns. The erratum provides a complete copy of PGE's comments on the Framework for VRET Models table.

This document is also being electronically served upon the UM 1690 Service List. Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Richard George". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke at the end.

J. Richard George
Assistant General Counsel

JRG: qal
cc: UM 1690 Service List

Framework for VRET Models Table, July 9, 2014 -- PGE Version

Basic Structure				Statutory Considerations					Potential Conditions
Resource Owner	Utility Role	Relationships	Notes/Comments	Further Dev of Significant RE	Effect on Dev of Competitive Retail Markets	Impacts on Non-Participating Customers	Competitive Procurement Process	Other Considerations	to mitigate issues or cons in the statutory considerations (e.g. VRET cap, transition adjustment charges)
(1.) Third Party (IPP, ESS)	<ul style="list-style-type: none"> Utility as aggregator of interested customer loads for third party owned generation resource and either link customers to third party or act as "go between." If third party owner is supplying PGE customer loads directly, then PGE role is contractually defined with ESS and with customer, provides distribution reliability and customer service, including metering and billing. Utility may contract with third party and supply customer from specific resource. Utility aggregates customers and purchases power from third party; utility offers interconnection service. Utility may offer balancing and ancillary services. 	<ul style="list-style-type: none"> To utility: brokering role between customer and third party; or purchaser of resource from third party for resale. To third party: defined in contract or under direct access regulations. To PGE cost of service customer--same as if regulated utility owned resource (utility is purchasing green output from IPP/ESS). To PGE direct access customer: distribution reliability, metering, billing, customer service. To third party investor: Bank or other party could ask as owner of resource, with a leaseback arrangement to the utility. 	<p>PGE already purchases green power for its portfolio mix from third parties. Given direct access options and marketing abilities of IPPs and ESSs, there is little to no value proposition for PGE to connect customers directly with third party generator resources.</p> <p>PGE may be interested in exploring options for customers on cost of service that seek to "green" a portion of their total load.</p> <p>PGE understands concerns from IPP/ESSs regarding access to competitive cost information if the customer secures third party resource and asks the utility to package the resource with delivery service.</p>						

<p>(2.) Regulated Utility</p>	<ul style="list-style-type: none"> • Utility operates and offers renewable resources directly to a customer. These resources could include: <ul style="list-style-type: none"> o Renewable resource located on customer premises, where the utility could own or lease the resource and act as an interconnector. o Renewable resource located on PGE property. o Off-site renewable resource from developer with option to buy. o Utility acting as a green power purchased from a third party owner. o Utility provides a portfolio approach blending long term resource development/acquisition with mid- to short-term green power options. o Utility provides bundled energy and REC product purchased by utility on behalf of customer to green portion of load, similar to PGE's Intel filing (Advice 12-27). 	<ul style="list-style-type: none"> • To utility: owner/operator of resource. • To customer: customer service, utility services-- transmission, distribution, reliability, operation and maintenance of resource, metering and billing, relationships with Green product certifier. • To other customers: potential to speed up siting of renewable resources used by the utility to meet RPS or other requirements. • To third party: potential provider of renewable resource, potential developer of utility project; competitor. 	<p>Pricing reflects cost of service and no cross subsidy from other customer classes or nonparticipating customers (including contribution by customer to PGE fixed generation costs of current and planned portfolio).</p>						
<p>(3.) Utility affiliate</p>	<p>Utility creates an affiliate in compliance with affiliated interest regulation to offer ESS services to customer.</p>	<ul style="list-style-type: none"> • To utility: governed by affiliated interest rules. • To customer: affiliate owns generation, sells to utility, direct access customer (as ESS) or to another ESS. • To third party: seller, competitor. 	<p>PGE is NOT interested in forming an affiliate to offer a VRET, as utilities already had the option to create an affiliate under SB 1149.</p>						

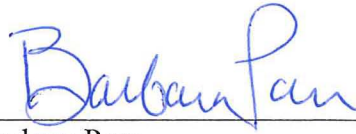
(4.) Customer Owned	<ul style="list-style-type: none"> • Customer owns resources located on or off site from their facilities. • Utility operates and maintains renewable resource, while offering a fully array of customer services developed to fit the customer’s needs. • Utility could own portions of resource, such as inverter. 	<ul style="list-style-type: none"> • To utility: O&M of renewable resource, complementing customer services. • To customer: owner of “billboard” renewable resource, in relationship with utility to manage resource. • To third party: potential provider of renewable resource, potential developer of utility project. 	Pricing reflects cost of service and no cross subsidy from other customer classes or nonparticipating customers (including contribution by customer to PGE fixed generation costs of current and planned portfolio). Customers are located within PGE's service territory.						
(5) Market Based REC product	Utility purchases un/bundled RECs to sell to customers under REC regulations.	<ul style="list-style-type: none"> • To utility: purchaser and reseller of RECs. • To customer: purchaser of utility offered RECs under Schedule 54. • To third party: provider of REC resources. 	PGE currently offers a Schedule 54 product under our Clean Wind program.						
(6.) 3rd Party (transmission VRET)	Utility acts as an interconnector between customer and third party resource. PGE maintains a “provider of last resort” relationship with customer and may charge fees for interconnection service. PGE may offer balancing and ancillary services.	<ul style="list-style-type: none"> • To utility: interconnection role between customer and third party. • To third party: provider of renewable resource/direct access to customer. • To customer: direct access to renewable resource from third party with PGE interconnection. 	Very similar if not identical to options in #1 and existing direct access/OATT program.						

<p>(7.) Hybrid</p>	<ul style="list-style-type: none"> • Customer or utility owns resource meeting majority of customer's demand. • Utility offers RECs or another renewable resource product to get customer to 100% renewables. 	<ul style="list-style-type: none"> • To utility: potential owner and likely operator of renewable resource. Provides customer services to customer, and offers other product to meet customer's renewables goal. Mitigates risk to customer. • To customer: potential owner of renewable resource; purchases from utility customer services and other products that meet the customer's renewables goal. • To third party: potential developer or seller of renewable resource; potential seller of RECs or other renewable product to meet customer's renewables goal. 	<p>This model allows for the utility flexibility in adhering to HB 4126's goals, while meeting each customer's particular needs.</p>						
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S ERRRATUM TO COMMENTS ON STAFF'S VRET MODELS** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UM 1690.

Dated at Portland, Oregon, this 28th day of July, 2014.



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**SERVICE LIST – 07/25/14
OPUC DOCKET #UM 1690**

**W=Waive Paper service
Confidential**

C=Confidential

HC=Highly

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