



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

June 16, 2014

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 1690 Voluntary Renewable Energy Tariff, PGE's Statement of Principles

Pursuant to the UM 1690 workshop on June 2, 2014, PGE hereby submits its Statement of Principles.

A green tariff can give customers another tool to support renewable energy development, decrease their environmental footprint and provide the energy flexibility they want to meet their specific business goals. A green tariff is a step beyond a renewable energy credit product. A green tariff product may allow a "steel-in-the-ground" or "billboard" resource that customers can point to as their resource or may involve other ways to claim more ownership or participation in the renewable project market.

Utilities are well-positioned to respond to customer interest in providing a green tariff electricity product because of our expertise in project development, relationship with our customers and knowledge of power markets. We believe that utility participation will stimulate the market and open new opportunities for renewable development. If other energy service suppliers choose to offer a green tariff product we would support their offering. However, it is due to our position as a trusted energy partner that customers sought a green tariff option from us and we responded by seeking language in HB 4126 to determine whether utilities could provide such a product without impairing the competitive marketplace.

Statement of Principles on Voluntary Renewable Energy Tariff

- Align customers' expectations of PGE as a trusted energy partner with the tariff options they want, including specific renewable energy resources.
 - Few customers want to integrate their own renewable resources into their power needs. Utilities should be allowed to offer that service to customers, ensuring seamless power supply with owned or purchased resources.
 - Build on what has been proven to work already; existing practices and procedures such as the utility sourcing processes for new facilities and contracts can be utilized here.

- Multi-year contracts are a must. One consistent theme we heard from customers is that this product will have more success if we can pass on the price surety of the resources we source.
- Flexibility is essential in order to meet customer needs and interests over time.
 - We expect customer interests and demands to change. The commission should establish the rules which govern any product offerings, but not dictate a tariff.
 - Different utilities may offer different products to meet the needs of customers.
- Avoid cost shifting between green tariff customers and others.
 - PGE already tracks and assigns costs to specific buckets in a variety of contexts and could do so under a green tariff.
- Avoid large administrative burdens.
 - A green tariff product will be not be utilized if processes add significant O&M or other costs to the utility or customer. Monitoring and other oversight is necessary, but we ask that it be strictly limited to the level of detail needed.

Should you have any questions or comments regarding this filing, please contact Isaiah Cox at (503) 464-7824.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pge.com

Sincerely,



For Karla Wenzel
Manager, Pricing and Tariffs

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S STATEMENT OF PRINCIPLES ON VOLUNTARY RENEWABLE ENERGY TARIFF** to be served by electronic mail to those parties whose email addresses appear on the attached service list for Docket No. UM 1690.

Dated at Portland, Oregon, this 16th day of June, 2014.



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