



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

April 1, 2015

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

RE: Advice No. 15-07, Schedule 122, Renewable Resource Automatic Adjustment Clause

Portland General Electric (PGE) submits this filing* pursuant to Oregon Revised Statutes (ORS) 757.210 and 469A.120, and Oregon Administrative Rule (OAR) 860-022-0025 for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **January 1, 2016**:

Tenth Revision of Sheet No. 122-1
Tenth Revision of Sheet No. 122-2

Also included in this filing is Direct Testimony and Exhibits of:

- Joey Ross and Rebecca Brown (PGE / 100-101)
- Direct Testimony Work Papers, provided on CD
- Motion for General Protective Order

This filing is made pursuant to the requirements of Schedule 122 to update the Renewable Resources Automatic Adjustment Clause. The purpose of updating the rate schedule is to recover the costs of qualifying Company-owned and / or contracted new renewable energy resource projects not otherwise included in rates. The proposed Schedule 122 prices are designed to recover the deferred 2015 revenue requirements and the prospective 2016 revenue requirements described in the testimony referenced above.

Concurrent with this filing, PGE is also filing a request for authorization to defer costs related to the renewable resource, and a request for authorization to engage in a property sale as part of a sale-leaseback agreement. Although filed separately, the three filings are interrelated. PGE proposes that this Advice Filing and the Application for Deferral be consolidated. Direct Testimony Confidential Work Papers will be provided upon approval and issuance of the Protective Order.

* Pursuant to the Rulemaking to Streamline eFiling Changes in Docket No. AR 583 and Order No. 14-434, Effective March 3, 2015, no hard copies will be sent.

To satisfy the requirements of OAR 860-022-0025(2), PGE provides the following response:

PGE estimates that approximately 857,000 customers will be impacted by this overall \$2.1 million or 0.1% decrease in revenues from Schedule 122 prices currently set at zero. A typical Schedule 7 customer consuming 840 kWh monthly will see a bill decrease of \$0.11 or 0.1%.

The requirements of OAR 860-022-0030(1) do not apply to this filing because PGE is proposing a decrease in prices rather than an increase.

To satisfy the requirements of ORS 757.259(6), PGE provides the following responses:

PGE's 2014 annual cycle revenues were approximately \$1,729 million. The sum of PGE's anticipated 2016 amortization of deferrals including the proposed Schedule 122 deferral portion is approximately \$2.9 million or approximately 0.2% of 2014 revenues. The amortization of the deferral amounts proposed in this filing is also approximately 0.2% of 2014 revenues. A list of the anticipated 2016 amortization of deferrals is provided in the work papers.

Should you have any questions or comments regarding this filing, please contact Rebecca Brown at (503) 464-8545 or Marc Cody at (503) 464-7434.

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

Sincerely,



Karla Wenzel
Manager, Pricing and Tariffs

Enclosures
cc: UE 283 Service List

**SCHEDULE 122
RENEWABLE RESOURCES AUTOMATIC ADJUSTMENT CLAUSE**

PURPOSE

This Schedule recovers the revenue requirements of qualifying Company-owned or contracted new renewable energy resource projects (including associated transmission) not otherwise included in rates. Additional new renewable projects may be incorporated into this schedule as they are placed in service. This adjustment schedule is implemented as an automatic adjustment clause as provided for under ORS 757.210 and Section 13 of the Oregon Renewable Energy Act (OREA).

AVAILABLE

In all territory served by the Company.

APPLICABLE

To all bills for Electricity Service except Schedules 76, 485, 489, 490, 491, 492, 495 and 576. This schedule is not applicable to direct access customers after December 31, 2010.

ADJUSTMENT RATE

The Adjustment Rate, applicable for service on and after the effective date of this schedule are:

<u>Schedule</u>			
7	(0.012)	¢ per kWh	
15	(0.010)	¢ per kWh	
32	(0.012)	¢ per kWh	
38	(0.012)	¢ per kWh	
47	(0.015)	¢ per kWh	
49	(0.014)	¢ per kWh	
75			
Secondary	(0.011)	¢ per kWh	
Primary	(0.011)	¢ per kWh	
Subtransmission	(0.011)	¢ per kWh	
83	(0.012)	¢ per kWh	
85			
Secondary	(0.012)	¢ per kWh	
Primary	(0.012)	¢ per kWh	

(R)

(R)

SCHEDULE 122 (Continued)

ADJUSTMENT RATE (Continued)

<u>Schedule</u>				
89				
	Secondary	(0.011)	¢ per kWh	(R)
	Primary	(0.011)	¢ per kWh	
	Subtransmission	(0.011)	¢ per kWh	
90		(0.010)	¢ per kWh	
91		(0.010)	¢ per kWh	
92		(0.011)	¢ per kWh	
95		(0.010)	¢ per kWh	(R)

ANNUAL REVENUE REQUIREMENTS

The Annual Revenue Requirements of a qualifying project will include the fixed costs of the renewable resource and associated transmission (including return on and return of the capital costs), operation and maintenance costs, income taxes, property taxes, and other fees and costs that are applicable to the renewable resource or associated transmission. Until the dispatch benefits are included in the Annual Power Cost Update Schedule 125, the net revenue requirements of each project (fixed costs less market value of the energy produced by the renewable resource plus any power costs such as fuel, integration and wheeling costs) will be deferred and incorporated the following January 1 into the Schedule 122 rates. This balancing account will accrue interest at the Commission-authorized rate for deferred accounts. Each year by April 1, the Company will file an update to the revenue requirements of resources included in this schedule to recognize projected changes for the following calendar year.

DEFERRAL MECHANISM

For each calendar year that the Company anticipates that a new renewable resource will commence operation, the Company may file a deferral request the earlier of the resource online date or April 1. The deferral amount will be for the fixed revenue requirements of the resource less net dispatch benefits. For purposes of determining dispatch benefits, the forward curves used to set rates for the year under the Annual Power Cost Update will be used. The deferral will be amortized over the next calendar year in Schedule 122 unless otherwise approved by the Oregon Public Utility Commission (OPUC). The amortization of the deferred amount will not be subject to the provisions of ORS 757.259(5).

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE _____

In the Matter of
Portland General Electric Company
Renewable Resources Automatic Adjustment
Clause, Revises Schedule 122

**MOTION FOR A GENERAL
PROTECTIVE ORDER**

EXPEDITED CONSIDERATION REQUESTED

Pursuant to ORCP 36(C)(7), OAR 860-001-0080(1) and (2)(b), and OAR 860-027-0200(9), Portland General Electric Company (“PGE”) requests the issuance of a general protective order in this proceeding. PGE believes good cause exists for the issuance of such an order to protect confidential market information and confidential business information, plans and strategies. In support of this Motion, PGE states:

1. PGE is a public utility in the state of Oregon and its rates, services, and accounting practices are subject to the regulation of the Commission.
2. The order is needed to protect confidential customer information and confidential business plans and strategies. Some of the work papers supporting this filing contain confidential information regarding ongoing business transactions and negotiations, as well as other confidential business matters. This information is confidential commercial information and/or trade secrets under ORCP 36(C)(7). The public release of this information could prejudice PGE and its customers.
3. PGE further anticipates it may be required to file periodic updates containing confidential information in this proceeding.

4. PGE also believes that parties participating in this docket may make further requests for information that will contain confidential commercial information and/or trade secrets under ORCP 36(C)(7).

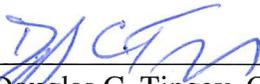
5. While PGE desires the flexibility to provide confidential information, as part of its application in this matter, the scheduling information being provided is confidential, sensitive business information, the public disclosure of which could be detrimental to PGE and its customers.

6. The Commission should, therefore, issue a Protective Order to protect the confidentiality of that material. The requested order, identical to the one that the Commission customarily issues, is attached.

For the reasons stated above, PGE requests that a protective order be issued in this proceeding.

DATED this 1st day of April, 2015.

Respectfully submitted,



Douglas C. Tingey, OSB No. 044366
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(503) 464-8926 (phone)
(503) 464-2200 (fax)
doug.tingey@pgn.com

ORDER NO.

ENTERED

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE _____

In the Matter of

Portland General Electric Company

Renewable Resources Automatic Adjustment
Clause, Revises Schedule 122

**GENERAL
PROTECTIVE
ORDER**

DISPOSITION: MOTION FOR PROTECTIVE ORDER GRANTED

On April 1, 2015, Portland General Electric Company ("PGE") filed a Motion for a general protective order with the Public Utility Commission of Oregon ("Commission"). PGE states that good cause exists for the issuance of such an order to protect confidential business information, plans, and strategies. Specifically, PGE states that work papers and supporting documents to be provided in response to data requests contain confidential information, the public release of which could prejudice PGE and its customers. PGE further adds that the protective order will facilitate the production of relevant information and expedite the discovery process in this docket.

I find that good cause exists to issue a general protective order, which is attached as Appendix A. The order permits the broadest possible discovery consistent with the need to protect confidential information. It shields no specific documents and makes no judgment about whether any particular document contains a trade secret or commercially sensitive information. Rather, the order adopts a process for resolving discovery disputes that include sensitive information.

The order permits any party to designate information as confidential if the party reasonably believes that the information falls within the scope of ORCP 36(C)(7). The confidential designation must be made in good faith and be limited to only those portions of the document that qualify as a protected trade secret or other confidential research, development, or commercial information. Any other party may challenge the designation of information as confidential. The designating party bears the burden of showing that the challenged information is covered by ORCP 36(C)(7).

Confidential information may be disclosed only to a "qualified person" as defined in paragraph 3 of the general protective order. The authors of the confidential material, the Commission, Administrative Law Judges, Commission Staff, and counsel of record for a party or persons directly employed by counsel are "qualified persons" and may review confidential information without individually signing the general protective order. Other persons wanting access to confidential information must become qualified under paragraph 10.

To receive confidential information, all parties except Commission Staff must sign the "consent to be bound" in section I of Appendix B. This includes the party that moved for issuance of the general protective order because any party may designate information as confidential under the order. By signing the "consent to be bound," a party agrees to be bound by the terms of the general protective order and certifies that it has an interest in the proceedings that is not adequately represented by other parties to the proceedings.

Any person given access to confidential information must ensure compliance with the general protective order and must take reasonable precautions to keep confidential information secure. Without the written permission of the designating party, no person may use or disclose the information for any purpose other than participating in these proceedings. Questions regarding whether a particular person is a "qualified person" under the general protective order may be directed to the Administrative Hearings Division at (503) 378-6678.

ORDER

IT IS ORDERED that the General Protective Order, attached as Appendix A, governs the disclosure of confidential information in these proceedings.

Made, entered, and effective on _____.

[Judge]
Administrative Law Judge

A party may appeal this order to the Commission pursuant to OAR 860-001-0720.

PROTECTIVE ORDER

DOCKET NO. UE _____

Scope of this Order:

1. This order governs the acquisition and use of “Confidential Information” in this proceeding.

Definitions:

2. “Confidential Information” is information that falls within the scope of ORCP 36(C)(7) (“a trade secret or other confidential research, development, or commercial information”).

3. A “qualified person” is an individual who is:

- a. An author(s), addressee(s), or originator(s) of the Confidential Information;
- b. A Commissioner or Commission staff;
- c. Counsel of record for a party;
- d. A person employed directly by counsel of record; or
- e. A person qualified pursuant to paragraph 10. This includes parties and their employees.

Designation of Confidential Information:

4. A party providing Confidential Information must inform other parties that the material has been designated confidential by placing the following legend on the material:

CONFIDENTIAL
SUBJECT TO GENERAL PROTECTIVE ORDER

To the extent practicable, the party may designate as confidential only the portions of the material covered by ORCP 36(C)(7).

5. A party may designate as confidential any information any information previously provided by giving written notice to the other parties. Parties in possession of newly designated Confidential Information must, when feasible, ensure that all copies of the information bear the above legend if requested by the designating party.

6. Any other party may challenge the designation of information as confidential by notifying the designating party. Once notified, the designating party bears the burden of showing that the challenged information is covered by ORCP 36(C)(7).

Information Given to the Commission:

7. Confidential Information filed or provided to the Commission or its staff;

Must be printed on yellow paper and placed in a sealed envelope or other appropriate container. **Only the portions of a document that fall within ORCP 36(C)(7) may be placed in the envelope/container.** The envelope/container shall bear the legend:

THIS ENVELOPE IS SEALED UNDER ORDER NO. _____
AND CONTAINS CONFIDENTIAL INFORMATION. THE
INFORMATION MAY BE SHOWN ONLY TO QUALIFIED
PERSONS AS DEFINED IN THE ORDER.

Disclosure of Confidential Information-

8. To receive Confidential Information, all parties, except Commission Staff, must sign the “consent to be bound” in section I of Appendix B. Confidential Information may not be disclosed to any person other than a Qualified Person. When feasible, Confidential Information must be delivered to counsel. In the alternative, Confidential Information may be made available for inspection and review by Qualified Persons in a place and time agreeable to the parties or as directed by the ALJ.

9. A Qualified Person may disclose Confidential Information to any other Qualified Person, unless the party designating party objects under paragraph 11.

10. To become a qualified person under paragraph 3(e), a person must:

- a. Read a copy of this general protective order;
- b. Execute a statement acknowledging that the order has been read and agreeing to be bound by the terms of the order;
- c. Date the statement;
- d. Provide a name, address, employer, and job title; and
- e. If the person is a consultant or advisor for a party, provide a description of the nature of the person’s consulting or advising practice, including the identity of his/her current, past, and expected clients.

Counsel must deliver a copy of the signed statement, including the information in (d) and (e), to the designating party and to all parties of record. The notification may be made by electronic mail or facsimile. A person qualified under paragraph 3(e) may not have access to Confidential Information sooner than seven days after the designating party receives a copy of the signed statement.

11. All Qualified Persons may have access to Confidential Information, unless the designating party objects as provided in this paragraph. The designating party must provide written notice to the Qualified Person as soon as the designating party becomes aware of reasons to restrict access. The parties must promptly confer and attempt to resolve any dispute over access to Confidential Information on an informal basis before filing a motion with the ALJ. After receipt of the written notice as required in this paragraph, the specific Confidential

Information may not be disclosed to the Qualified Person until the issue is resolved.

Preservation of Confidentiality-

12. Without the written permission of the designating party, any person given access to Confidential Information under this order may not use or disclose Confidential Information for any purpose other than participating in these proceedings. All Qualified Persons must take reasonable precautions to keep Confidential Information secure. Disclosure of Confidential Information for purposes of business competition is strictly prohibited.

A Qualified Person may reproduce Confidential Information to the extent necessary to participate in these proceedings. A Qualified Person may disclose Confidential Information only to other Qualified Persons associated with the same party.

Duration of Protection-

13. The Commission will preserve the confidentiality of Confidential Information for a period of five years from the date of the final order in these proceedings, unless extended by the Commission at the request of the designating party. The Commission will notify the designating party at least two weeks prior to the release of confidential information.

Destruction After Proceeding-

14. Counsel of record may retain memoranda, pleadings, testimony, discovery, or other documents containing Confidential Information to the extent reasonably necessary to maintain a file of these proceedings or to comply with requirements imposed by another governmental agency or court order. The information retained may not be disclosed to any person. Any other person retaining Confidential Information must destroy or return it to the designating party within 90 days after final resolution of these proceedings unless the designating party consents, in writing, to retention of the Confidential. This paragraph does not apply to the Commission or its Staff.

Appeal to the Presiding Officer-

15. Any party may request that the ALJ conduct a conference to help resolve disputes related to this protective order.

A party challenging the designation of information as confidential may file an objection with the ALJ that identifies the information in dispute and includes a certification that reasonable efforts to achieve an informal resolution have been unsuccessful. Within seven days of the objection, unless otherwise ordered by the ALJ, the designating party must either remove the confidential designation or file a written response identifying the legal basis for the claim of confidentiality. The challenging party may file a written reply to any response within seven days. If the designating party does not timely respond to the motion, the Commission will remove the confidential designation from the challenged information.

Additional Protection-

16. If a designating party seeks additional protection for Confidential Information, the party may move for any of the remedies in ORCP 36(C). The motion must include:

- a. The parties involved;
- b. The exact nature of the information involved;
- c. The legal basis for the claim that the information is protected under ORCP 36 (C)(7) or the Public Records Law;
- c. The exact nature of the relief requested;
- d. The specific reasons the requested relief is necessary; and
- e. A detailed description of the intermediate measures, including selected redaction, explored by the parties and why such measures do not resolve the dispute.

Pending the Commission's ruling on a motion for additional protection, the information need not be released.

SIGNATORY PAGE
DOCKET NO. UE ____

I. Consent to be Bound:

This general protective order governs the use of Confidential Information in these proceedings.

_____ (Party) agrees to be bound by the terms of the general protective order and certifies that it has an interest in these proceedings that is not adequately represented by other parties to the proceedings.

Signature: _____

Printed Name: _____

Date: _____

II. Persons Qualified under Paragraphs 3(a) through 3(d):

_____ (Party) identifies the following person(s) automatically qualified under paragraphs 3(a) through (d).

PRINTED NAME	DATE

SIGNATORY PAGE
DOCKET NO. UE _____

II. Persons Qualified under Paragraph 3(e):

I have read the general protective order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 10.

By: Signature: _____ Date: _____

Printed Name:

Address:

Employer:

Job Title:

Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____

Printed Name:

Address:

Employer:

Job Title:

Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____

Printed Name:

Address:

Employer:

Job Title:

Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____

Printed Name:

Address:

Employer:

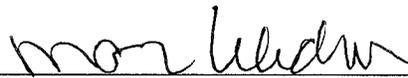
Job Title:

Paragraph 10(e) information also provided.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S ADVICE NO. 15-07, SCHEDULE 122, RENEWABLE RESOURCE AUTOMATIC ADJUSTMENT CLAUSE** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UE 283.

DATED at Portland, Oregon, this 1st day of April 2015.



Mary Widman
Specialist, Rates and Regulatory Affairs
Portland General Electric Company
121 SW Salmon St., 1WTC0702
Portland, OR 97204
(503) 464-8223 (Telephone)
(503) 464-7651 (Fax)
mary.widman@pgn.com

SERVICE LIST
OPUC DOCKET # UE 283

Judy Johnson (C) PUBLIC UTILITY COMMISSION OF OREGON judy.johnson@state.or.us	Stephanie S. Andrus (C) PUC – DEPARTMENT OF JUSTICE stephanie.andrus@state.or.us
Douglas C. Tingey (C) PORTLAND GENERAL ELECTRIC COMPANY doug.tingey@pgn.com	Jay Tinker (C) PORTLAND GENERAL ELECTRIC COMPANY pge.opuc.filings@pgn.com
OPUC Docket CITIZENS' UTILITY BOARD OF OREGON dockets@oregoncub.org	Robert Jenks (C) CITIZENS' UTILITY BOARD OF OREGON bob@oregoncub.org
Sommer Templet (C) CITIZENS' UTILITY BOARD OF OREGON sommer@oregoncub.org	Greg Bass (C) NOBLE AMERICAS ENERGY SOLUTIONS gbass@noblesolutions.com
Kevin Higgins (C) ENERGY STRATEGIES LLC khiggins@energystrat.com	Gregory Adams RICHARDSON ADAMS PLLC greg@richardsonadams.com
S Bradley Van Cleve (C) DAVISON VAN CLEVE PC bvc@dvclaw.com	Tyler C. Pepple (C) DAVISON VAN CLEVE PC tcp@dvclaw.com
Bradley Mullins (C) DAVISON VAN CLEVE PC brmullins@mwanalytics.com	E-Filing NORTHWEST NATURAL efiling@nwnatural.com
Mark Thompson NORTHWEST NATURAL mark.thompson@nwnatural.com	Wendy Gerlitz (C) NW ENERGY COALITION wendy@nwenergy.org
Nona Soltero FRED MEYER STORES/KROGER Nona.soltero@fredmeyer.com	Sarah Wallace PACIFIC POWER Sarah.wallace@pacificcorp.com
David Tooze CITY OF PORTLAND David.tooze@portlandoregon.gov	Oregon Dockets PACIFICORP, DBA PACIFIC POWER oregondockets@pacificcorp.com
Kurt Boehm BOEHM KURTZ & LOWRY kboehm@bkllawfirm.com	Jody Cohn BOEHM KURTZ & LOWRY jkyler@bkllawfirm.com
Benjamin Walters CITY OF PORTLAND Ben.walters@portlandoregon.gov	