



610 SW Broadway, Suite 400, Portland OR 97205 | 503-227-1984 | www.oregoncub.org

June 22, 2016

Public Utility Commission of Oregon
201 High St SE, Suite 100
Salem, Oregon 97301

Re: UE 308 - 2017 Annual Power Cost Update Tariff Errata Filing

The Citizens' Utility Board of Oregon files herewith a correction to its originally submitted UE 308 Opening Testimony, Exhibit 108 on June 20, 2016. Exhibit 108 was not labeled or numbered, and CUB requests that this be amended. CUB has attached a correctly labeled exhibit for this filing.

Please contact me if you have any questions with this filing.

Sincerely,

A handwritten signature in black ink that reads "Sarah Ryan-Knox". The signature is written in a cursive, flowing style.

Sarah Ryan-Knox
Paralegal
Citizens' Utility Board of Oregon
610 SW Broadway, Ste. 400
Portland, OR 97205
T: (503) 227-1984 x 23
F: (503) 224-2596
sarah@oregoncub.org

June 14, 2016

TO: Sarah Knox-Ryan
Citizens Utility Board of Oregon (CUB)

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 308
PGE Response to CUB Data Request No. 038
Received June 6, 2016**

Request:

Is the Company planning on deferring any of the costs of EIM (both start-up costs and otherwise)? If so, please detail and estimate the costs that the Company plans to defer. Please provide a demonstration/explanation of the Company's understanding of prudence/used and usefulness for EIM investments when the Company is forecasting no benefit to customers during the forecasted time period.

Response:

PGE objects to this request to the extent that it seeks a legal opinion from PGE. Without waiving its objection, PGE responds as follows.

No, PGE does not currently plan to defer costs associated with EIM implementation or participation.

With respect to prudence, PGE excluded costs and benefits from its 2017 net variable power cost forecast. Since costs and benefits are excluded, a prudence determination by the Commission in Docket No. UE 308 is not necessary.

PGE believes that its decision to participate in the Western EIM is prudent as part of its efforts to enhance operational efficiency, integrate renewable resources, and optimize PGE's generation portfolio. The key capital projects described in PGE Exhibit 400, pages 19 – 20 will be used to enable PGE's participation in the Western EIM. PGE is preparing for a market entry date of October 1, 2017.