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June 29, 2018

Via USPS Mail and E-mail

Public Utility Commission of Oregon

Attn: Filing Center

201 High St. SE, Suite 100

Salem, OR 97301

Re: In the Matter of the Complaint of BLUE MARMOT V LLC, BLUE MARMOT VI LLC,
BLUE MARMOT VII LLC, BLUE MARMOT VIII LLC, BLUE MARMOT IX LLC,
against PORTLAND GENERAL ELECTRIC COMPANY
Docket Nos. UM 1829, UM 1830, UM 1831, UM 1832, UM 1833

Dear Filing Center:

Please find enclosed: 1) the errata pages in clean and red format for Blue Marmot/400, Moyer/30-31; and 2) confidential copies of Exhibit/403. The confidential copies of Exhibit/403 were sent to the parties pursuant to Order No. 17-219 via USPS mail, and the errata pages were filed electronically.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Min Hu". The signature is fluid and cursive, with a long horizontal stroke at the end.

Min Hu

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the confidential copies of Exhibit/403 of Blue Marmot V, VI, VII, VIII, and IX upon the parties shown below by mailing a copy via First Class U.S. Mail.

Dated at Portland, Oregon, this 29th day of June, 2018.

Sincerely,



Min Hu

STEPHANIE S ANDRUS (C)
PUC STAFF--DEPARTMENT OF
JUSTICE
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096

LESLIE FREIMAN (C)
EDP RENEWABLES NORTH
AMERICA LLC
808 TRAVIS ST STE 700
HOUSTON TX 77002

DONALD LIGHT (C)
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST, 1 WTC-1301
PORTLAND OR 97204

LISA F RACKNER (C)
MCDOWELL RACKNER &
GIBSON PC
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205

JORDAN SCHOONOVER (C)
MCDOWELL, RACKNER, &
GIBSON PC
419 SW 11TH AVE STE 400
PORTLAND OR 97205

WILL TALBOTT (C)
EDP RENEWABLES NORTH
AMERICA LLC
DEVELOPMENT - WESTERN
REGION
53 SW YAMHILL ST
PORTLAND OR 97204

1 which adds those schedules back into the transfer limit calculation and the amount of
2 transmission available for the EIM is increased back to its TTC.

3 **Q. PGE seems to imply that if they have anything less than 295 MW of dedicated**
4 **rights, then there will be no transmission in the EIM. Do you agree?**

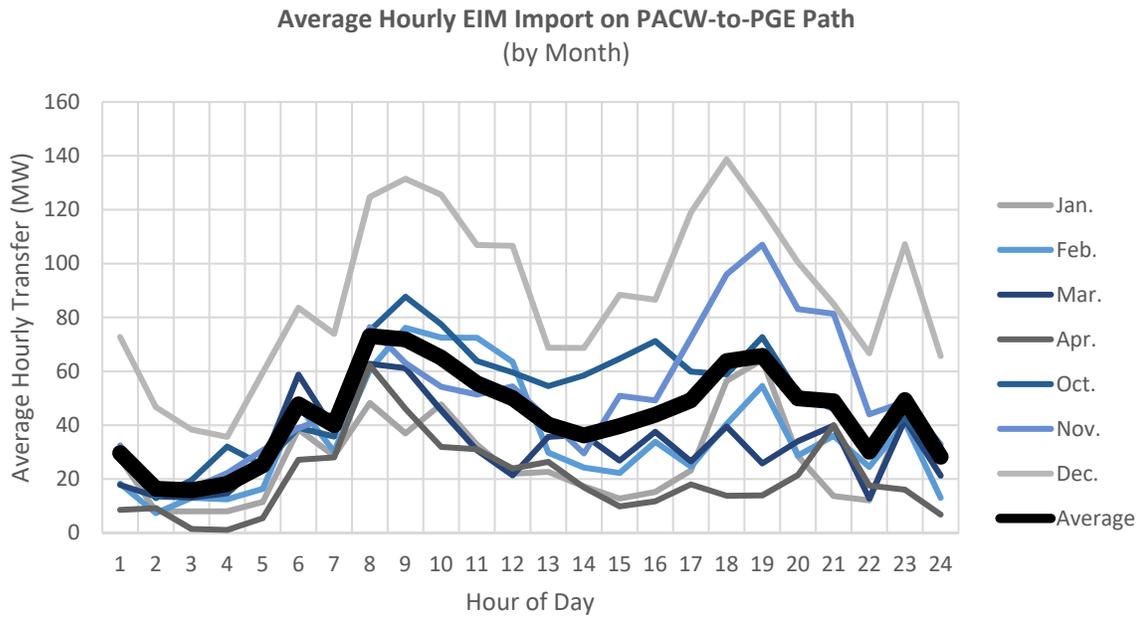
5 **A.** No. Based on the ATC Methodology described above, there will be significant
6 amounts of transmission in the EIM on the PACW-to-PGE import path if PGE were
7 to reduce the amount of Interchange Rights Holder Methodology transmission on the
8 path and dedicate more transmission using the ATC Methodology.

9 **Q. Even if some transmission is used to deliver the output from the Blue Marmots,**
10 **will much of PGE's EIM operations continue under status quo?**

11 **A.** Generally, yes. Figure 2, below, shows when ~~transfers~~ imports into PGE have
12 occurred, on an average hourly basis (based on 15-minute market data), on the
13 PACW-to-PGE path since PGE joined the EIM, broken down by month.

1

Figure 2: Average Hourly EIM ~~Transfers~~ Imports into PGE on PACW-to-PGE Path



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7

PGE imports power on the path during all hours – not just during daytime conditions. In fact, on average, its highest levels of imports occur during the ~~very~~ early-morning hours between 1-4 am and evening hours. Since the Blue Marmots will only be generating during daytime hours, and then even still at reduced levels for

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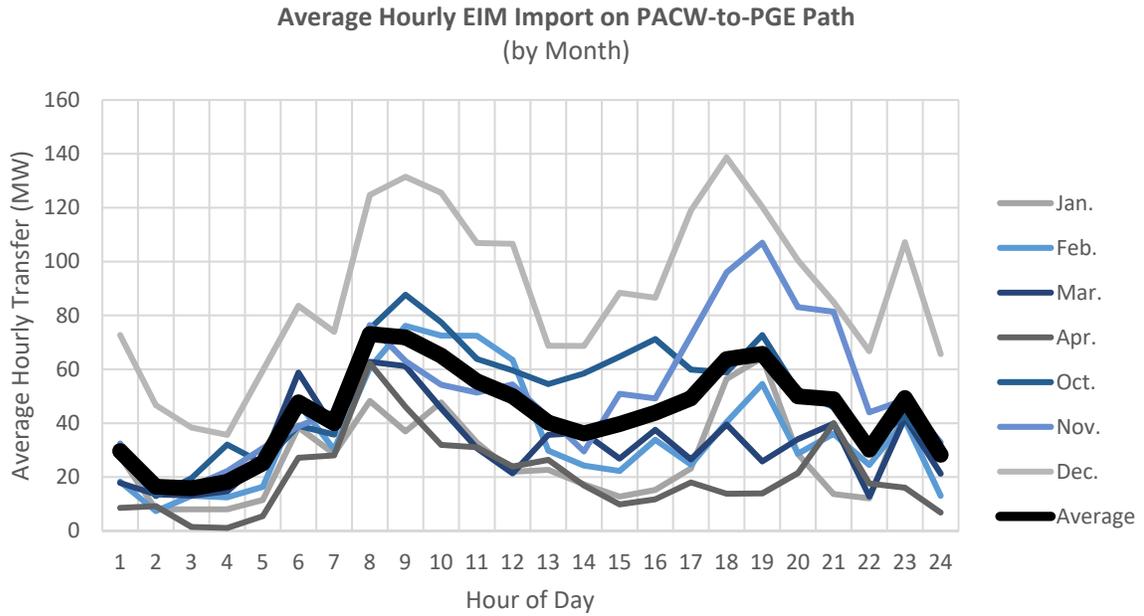
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