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November 21, 2019

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 1987 – In the Matter of Portland General Electric Company, Request to Update Schedule 201 and Standard Power Purchase Agreements

Attention Filing Center:

Attached for filing in the above-captioned docket is Portland General Electric Company's Request for Adoption of Schedule.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1987**

In the Matter of

Portland General Electric Company,

Request to Update Schedule 201 and
Standard Power Purchase Agreements.

**PORTLAND GENERAL ELECTRIC
COMPANY’S REQUEST FOR
ADOPTION OF SCHEDULE**

1 At the November 18, 2019, Prehearing Conference, the parties were unable to agree upon a
2 schedule for this docket and therefore Administrative Law Judge (ALJ) Allan Arlow requested
3 that the parties submit their proposals for the schedule in writing. Pursuant to that request, Portland
4 General Electric Company (PGE) proposes that the ALJ adopt a schedule in this case that provides
5 for three rounds of testimony and a hearing, and that the initial round of testimony be scheduled
6 for a date that would allow the parties to avoid expending substantial efforts in the docket pending
7 the ALJ’s Ruling on the Motion to Stay filed by Northwest and Intermountain Power Producers
8 Coalition, Renewable Energy Coalition, and Community Renewable Energy Association
9 (collectively, the QF Parties) on November 12, 2019. Specifically, PGE asks that the ALJ adopt
10 the following schedule:

Opening Testimony by PGE	February 3, 2020
Response Testimony by Staff and Intervenors	March 23, 2020
Reply Testimony by PGE	May 11, 2020
Hearing	Week of June 1, 2020

11 PGE believes that this schedule will allow adequate time for briefing and a decision on the
12 QF Parties’ Motion to Stay, while avoiding undue delay in the resolution of this docket.

1 At the time of the Prehearing Conference, the QF Parties objected to PGE’s proposed
2 schedule on two bases. The QFs argued that PGE’s proposal to delay initial testimony until after
3 the ALJ issues a ruling on the Motion to Stay is inadequate; instead the QF Parties took the position
4 that the delay in the schedule should be lengthy enough not only to allow the ALJ to issue his
5 ruling, but also to allow time for the QF Parties to certify the ALJ’s Ruling to the Commission,
6 presumably in the event the ruling is not in their favor. In addition, the QF Parties (as well as
7 Staff) stated their views that the schedule should allow for five instead of three rounds of
8 testimony. PGE disagrees on both counts.

9 First, PGE believes that it is unreasonable to delay the schedule to allow sufficient time to
10 certify the ALJ’s ruling to the Commission. While PGE understands that the QFs have the right
11 to certify adverse decisions, the Company does not agree that it is appropriate to further delay the
12 docket to allow them to do so—particularly when the issue proposed to be certified is not
13 substantive and would have no particular precedential effect. Moreover, PGE should not be
14 required to bear the consequences of the QF Parties’ failure to file their Motion to Stay until six
15 weeks after PGE made its Revised Filing on October 1, 2019, and requested that it be considered
16 expeditiously.

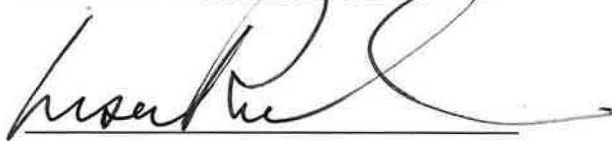
17 Second, PGE believes that five rounds of testimony are unnecessary. PGE first filed its
18 proposed standard power purchase agreements (PPAs) and Schedule 201 that are the subject of
19 this case in December of 2018—nearly a year ago. Since that time, the QF Parties, Staff, PGE and
20 the Alliance of Western Energy Consumers (AWEC) participated in six workshops and exchanged
21 several rounds of redlines and other documents. By the end of the process, all parties were not
22 only fully familiar with the proposed PPAs, but they had also exchanged views on each and every
23 issue in dispute. In addition, in the October 1 Revised Filing, PGE incorporated scores of revisions
24 requested by the QF Parties. While a number of issues are still in dispute, all parties are fully
25 aware of each other’s positions on these issues, and therefore the three rounds of testimony will be
26 more than adequate to fully vet the issues for the Commission.

1 In light of the (i) considerable time parties have had to review PGE's initial filing, (ii) the
2 extensive number of workshops and settlement conferences in this docket (six), and (iii) the fact
3 that PGE's revised filing incorporated many of the QFs' suggested changes and avoided making
4 policy changes, PGE believes this docket could be resolved on several rounds of comments. At
5 the Prehearing Conference, both Staff and the QF Parties stated that they believed testimony and
6 hearing was necessary. PGE supports three rounds of testimony as a reasonable compromise that
7 accommodates the position of Staff and the QF Parties.

8 For these reasons, PGE urges the ALJ to adopt the schedule proposed above.

Dated: November 21, 2019.

MCDOWELL RACKNER GIBSON PC



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