



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

June 30, 2015

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: Advice No. 15-17, 2015 Multi Year Opt-Out Window, Enrollment Period N

Portland General Electric (PGE) submits this filing pursuant to Oregon Revised Statutes (ORS) 757.205 and 757.210 and Oregon Administrative Rules (OARs) 860-022-0025 and 860-022-0030 for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **September 1, 2015**:

Sixth Revision of Sheet No. 129-1
Thirteenth Revision of Sheet No. 129-2
Twentieth Revision of Sheet No. 129-3
Eighth Revision of Sheet No. 129-4
Fourth Revision of Sheet No. 129-5
Fifth Revision of Sheet No. 485-1
Fifth Revision of Sheet No. 485-2
Tenth Revision of Sheet No. 489-1
Twelfth Revision of Sheet No. 489-2
Second Revision of Sheet No. 490-1

The filing reflects minor housekeeping changes to Schedule 129; we consolidated the Enrollment Periods that are no longer applicable which caused pagination changes. In Special Condition 1, references to Schedules 76R and 576R were removed. The Schedules should have been deleted at the resolution of UE 283 and were missed. Also, due to pagination, the following sheet is no longer needed and should be removed from the Tariff:

First Revision of Sheet No. 129-6

The purpose of this filing is to offer qualifying large nonresidential customers a three or five year cost of service opt-out beginning January 1, 2016 through an enrollment period during September 2015 (Enrollment Period N).

The cost of service opt-out implements the requirements of Oregon Administrative Rule (OAR) 860-038-0275(5) to "offer customers a multi-year, direct access program with an associated fixed transition adjustment."

The prices on Schedule 129 for Enrollment Period N are indicative only and will be revised in late August 2015 to be posted on the Company's public website and filed with the Commission on August 31, 2015 to reflect updated power costs and loads using the methodology presented in this filing. In addition, the prospective UE 294 tariff energy prices for Schedules 85, 89, 90, 91, 92, and 95 will be updated based on the criteria above. The prospective energy prices contained in this filing are based on the UE 294 initial Net Variable Power Cost estimates.

Schedule 129: Three Year and Five Year Options

Customers who choose Schedules 485, 489, 490, 491, 492 or 495 for service in 2016 will be subject to the applicable Schedule 129, Transition Cost Adjustments. Customers served on the five-year term of service will have differing Schedule 129 transition adjustments from those customers served on the three-year term of service. This is consistent with the provisions of the UE 262 Second Partial Stipulation that specified that for the five-year term, the initial Schedule 129 transition adjustments will reflect current Commission-approved fixed generation costs. These fixed generation costs will then be subject to update during the five-year term consistent with Commission orders related to general rate cases or Renewable Resource Automatic Adjustment Clause proceedings. The UE 262 Second Partial Stipulation also specified that for the three-year term, the Schedule 129 transition adjustments will incorporate the revenue requirements of both existing and new resources, if any, expected to begin providing service to customers during the three-year period.

Because PGE is proposing the inclusion of the Carty generation resource in UE 294 presumed to be in service in May 2016, the Schedule 129 transition adjustments for the three-year term are much higher than those for the five-year term. This difference in transition adjustments is illusory however, because for the five-year term, the Schedule 129 transition adjustments will be increased on January 1, 2016 consistent with the UE 294 Commission order recognizing the appropriate level of fixed generation costs. In addition, the new Carty generation resource proposed to be placed in service in May 2016 will also increase the Schedule 129 transition adjustments for customers choosing the five-year option. Enclosed with the work papers is a demonstration that the inclusion of the estimated fixed costs of Carty in 2016 yields Schedule 129 transition adjustments that are similar on average for the three- and five-year terms.

The Schedule 129 transition adjustments are differentiated by schedule and delivery voltage in a manner consistent with the provisions of the UE 262 Second Partial Stipulation approved in OPUC Order 13-459. Development of these indicative Schedule 129 adjustment rates are provided in the attached work papers. The final posted adjustment rates will be developed in the same manner but updated for more recent tariff price estimates, a new load forecast, updated power costs, and updated forward market prices.

To satisfy the requirements of Oregon Administrative Rules 860-022-0025(2) and 860-022-0030(1), PGE provides the following responses:

OARs 860-022-0025 and 860-0022-0030 require that PGE submit a statement of the tariff schedule change, the number of customers affected, the change in revenue, and the grounds supporting the change. This filing proposes new prices to a limited number of eligible customers, all of whom may choose not to participate, therefore, it is unknown how many customers will make this election and the revenue change is unknown.

Please direct any questions regarding this filing to Marc Cody at (503) 464-7434.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Karla Wenzel', written in a cursive style.

Karla Wenzel
Manager, Pricing and Tariffs

Enclosure(s)

**SCHEDULE 129
LONG-TERM TRANSITION COST ADJUSTMENT**

AVAILABLE

In all territory served by the Company.

APPLICABLE

Applicable to Large Nonresidential Customers that have selected service under Schedules 485, 489, 490, 491, 492, and 495.

TRANSITION COST ADJUSTMENT

Minimum Five Year Opt-Out

For Enrollment Periods A - H: 0.000 ¢ per kWh

(C)

For Enrollment Period I (2010), the Transition Cost Adjustment will be:

(M)

1.545 ¢ per kWh	January 1, 2011 through December 31, 2011
1.374 ¢ per kWh	January 1, 2012 through December 31, 2012
1.083 ¢ per kWh	January 1, 2013 through December 31, 2013
0.818 ¢ per kWh	January 1, 2014 through December 31, 2014
0.625 ¢ per kWh	January 1, 2015 through December 31, 2015
0.000 ¢ per kWh	after December 31, 2015

For Enrollment Period J (2011), the Transition Cost Adjustment will be:

2.182 ¢ per kWh	January 1, 2012 through December 31, 2012
1.492 ¢ per kWh	January 1, 2013 through December 31, 2013
1.022 ¢ per kWh	January 1, 2014 through December 31, 2014
0.749 ¢ per kWh	January 1, 2015 through December 31, 2015
0.601 ¢ per kWh	January 1, 2016 through December 31, 2016
0.000 ¢ per kWh	after December 31, 2016

For Enrollment Period K (2012), the Transition Cost Adjustment will be:

Period	Sch. 485 Secondary Voltage ¢ per kWh	Sch. 485 Primary Voltage ¢ per kWh	Sch. 489 Secondary Voltage ¢ per kWh	Sch. 489 Primary Voltage ¢ per kWh	Sch. 489 Subtransmission Voltage ¢ per kWh
2013	2.244	2.168	2.085	2.030	2.019
2014	1.548	1.495	1.395	1.369	1.370
2015	1.273	1.229	1.120	1.106	1.113
2016	1.055	1.018	0.901	0.897	0.909
2017	0.745	0.718	0.591	0.602	0.619
After 2017	0.000	0.000	0.000	0.000	0.000

(M)

Advice No. 15-17

Issued June 30, 2015

James F. Lobdell, Senior Vice President

**Effective for service
on and after September 1, 2015**

SCHEDULE 129 (Continued)

TRANSITION COST ADJUSTMENT (Continued)
Minimum Five Year Opt-Out

For Enrollment Period L (2013), the Transition Cost Adjustment will be:

Period	Sch. 485 Secondary Voltage ¢ per kWh	Sch. 485 Primary Voltage ¢ per kWh	Sch. 489 Secondary Voltage ¢ per kWh	Sch. 489 Primary Voltage ¢ per kWh	Sch. 489 Subtransmission Voltage ¢ per kWh
2014	1.992	1.956	1.398	1.728	1.709
2015	1.718	1.695	1.113	1.466	1.450
2016	1.482	1.466	0.860	1.239	1.226
2017	1.228	1.223	0.589	0.997	0.987
2018	1.154	1.147	0.483	0.921	0.914
After 2018	0.000	0.000	0.000	0.000	0.000

(M)

Commencing with enrollment Period M, the Schedule 129 Transition Cost Adjustment will be updated to reflect OPUC-approved changes in fixed generation costs during the five-year period.

(N)
(N)

For Enrollment Period M (2014), the current Transition Cost Adjustments are:

Period	Sch. 485 Sec. Vol. ¢ per kWh	Sch. 485 Pri. Vol. ¢ per kWh	Sch. 489 Sec. Vol. ¢ per kWh	Sch. 489 Pri. Vol. ¢ per kWh	Sch. 489 Sub. Vol. ¢ per kWh	Sch. 490 Pri. Vol. ¢ per kWh	Schs. 491/492/495 ¢ per kWh
2015	1.712	1.704	1.443	1.415	1.383	1.381	1.311
2016	1.712	1.704	1.443	1.415	1.383	1.381	1.311
2017	1.712	1.704	1.443	1.415	1.383	1.381	1.311
2018	1.712	1.704	1.443	1.415	1.383	1.381	1.311
2019	1.712	1.704	1.443	1.415	1.383	1.381	1.311
After 2019	0.000	0.000	0.000	0.000	0.000	0.000	0.000

(M)

SCHEDULE 129 (Continued)

TRANSITION COST ADJUSTMENT (Continued)
Minimum Five Year Opt-Out

Commencing with enrollment Period M, the Schedule 129 Transition Cost Adjustment will be updated to reflect OPUC-approved changes in fixed generation costs during the five-year period.

For Enrollment Period N (2015), the current Transition Cost Adjustments are:

Period	Sch. 485 Sec. Vol. ¢ per kWh	Sch. 485 Pri. Vol. ¢ per kWh	Sch. 489 Sec. Vol. ¢ per kWh	Sch. 489 Pri. Vol. ¢ per kWh	Sch. 489 Sub. Vol. ¢ per kWh	Sch. 490 Pri. Vol. ¢ per kWh	Schs. 491/492/495 ¢ per kWh
2016	2.354	2.327	2.225	2.186	2.123	1.900	1.919
2017	2.354	2.327	2.225	2.186	2.123	1.900	1.919
2018	2.354	2.327	2.225	2.186	2.123	1.900	1.919
2019	2.354	2.327	2.225	2.186	2.123	1.900	1.919
2020	2.354	2.327	2.225	2.186	2.123	1.900	1.919
After 2020	0.000	0.000	0.000	0.000	0.000	0.000	0.000

(N)(M)

(N)

(M)

SCHEDULE 129 (Continued)

TRANSITION COST ADJUSTMENT (Continued)
Three Year Opt-Out

This option was not available during Enrollment Periods A and B

(M)

For Enrollment Periods C - K, No Longer Available

(M)

For Enrollment Period L (2013), the Transition Cost Adjustment will be:

Period	Sch. 485 Secondary Voltage ¢ per kWh	Sch. 485 Primary Voltage ¢ per kWh	Sch. 489 Secondary Voltage ¢ per kWh	Sch. 489 Primary Voltage ¢ per kWh	Sch. 489 Subtransmission Voltage ¢ per kWh
2014	1.992	1.956	1.398	1.728	1.709
2015	1.718	1.695	1.113	1.466	1.450
2016	1.482	1.466	0.860	1.239	1.226

For Enrollment Period M (2014), the Transition Cost Adjustment will be:

Period	Sch. 485 Sec. Vol. ¢ per kWh	Sch. 485 Pri. Vol. ¢ per kWh	Sch. 489 Sec. Vol. ¢ per kWh	Sch. 489 Pri. Vol. ¢ per kWh	Sch. 489 Sub. Vol. ¢ per kWh	Sch. 490 Pri. Vol. ¢ per kWh	Schs. 491/492/495 ¢ per kWh
2015	2.199	2.131	1.900	1.864	1.826	1.714	1.739
2016	2.199	2.131	1.900	1.864	1.826	1.714	1.739
2017	2.199	2.131	1.900	1.864	1.826	1.714	1.739

(M)

(M)

For Enrollment Period N (2015), the Transition Cost Adjustment will be:

Period	Sch. 485 Sec. Vol. ¢ per kWh	Sch. 485 Pri. Vol. ¢ per kWh	Sch. 489 Sec. Vol. ¢ per kWh	Sch. 489 Pri. Vol. ¢ per kWh	Sch. 489 Sub. Vol. ¢ per kWh	Sch. 490 Pri. Vol. ¢ per kWh	Schs. 491/492/495 ¢ per kWh
2016	2.948	2.861	2.798	2.747	2.754	2.443	2.504
2017	2.948	2.861	2.798	2.747	2.754	2.443	2.504
2018	2.948	2.861	2.798	2.747	2.754	2.443	2.504

(N)

(N)

SCHEDULE 129 (Concluded)

(T)

SPECIAL CONDITIONS

1. Annually, the total amount paid in Schedule 129 Long-Term Transition Cost Adjustments associated with Enrollment Periods A through K will be collected through applicable Large Nonresidential rate schedules (Schedules 75, 85, 89, 90, 485, 489, 490, 575, 585, 589 and 590), through either the System Usage or Distribution Charges. Commencing with Enrollment Period L, the Schedule 129 amounts paid or received will be collected from all rate schedules, through either System Usage Charges or Distribution Charges. Such adjustment to the System Usage or Distribution Charges will be made at the time the Company files final rates for Schedule 125, and will be effective on January 1st of the following calendar year. (C)

2. Annually, changes in fixed generation revenues resulting from either return to or departure from Cost of Service pricing by Schedules 485, 489, 490, 491, 492, and 495 customers relative to the Company's most recent general rate case will be incorporated into the System Usage Charges or Distribution Charges of all rate schedules. Such adjustment to the System Usage or Distribution Charges will be made at the time the Company files final rates for Schedule 125, and will be effective on January 1st of the following calendar year. The adjustment to the System Usage or Distribution Charges resulting from changes in fixed generation revenues shall not result in an overall rate increase or decrease of more than 2 percent except as noted below. For those Enrollment Periods in which the first-year Schedule 129 Transition Adjustments are expected to be positive charges to participants, the projected first-year revenues from Schedule 129 will be netted against the changes in fixed generation costs for purposes of calculating the proposed overall rate increase or decrease. Should the rate increase or decrease exceed 2 percent, the amounts exceeding 2 percent will be deferred for future recovery through a balancing account. This balancing account will be considered an "Automatic Adjustment Clause" as defined in ORS 757.210. For purposes of calculating the percent change in rates, Schedule 125 prices with and without the increased/decreased participating load will be determined.

3. In determining changes in fixed generation revenues from movement to or from Schedules 485, 489, 490, 491, 492, and 495, the following factors will be used: (M)

Schedule		¢ per kWh
85	Secondary	2.911
	Primary	2.860
89	Secondary	2.739
	Primary	2.688
	Subtransmission	2.652
90		2.674
91		2.574
92		2.574
95		2.574

TERM

The term of applicability under this schedule will correspond to a Customer's term of service under Schedules 485, 489, 490, 491, 492 or 495.

(M)

Advice No. 15-17

Issued June 30, 2015

James F. Lobdell, Senior Vice President

**Effective for service
on and after September 1, 2015**

**SCHEDULE 485
LARGE NONRESIDENTIAL
COST OF SERVICE OPT-OUT
(201 - 4,000 kW)**

AVAILABLE

In all territory served by the Company.

APPLICABLE

To each Large Nonresidential Customer whose Demand has exceeded 200 kW more than six times in the preceding 13 months but has not exceeded 4,000 kW more than once in the preceding 13 months, or with seven months or less of service has not had a Demand exceeding 4,000 kW and who has chosen the Company's transition plan during one of the enrollment periods specified below. To obtain service under this schedule, Customers must enroll a minimum of 1 MWA determined by a demonstrated usage pattern such that projected usage for a full 12 months is at least 8,760,000 kWh (1 MWA) from one or more Points of Delivery (POD). Each POD must have a Facility Capacity of at least 250 kW. Service under this schedule is limited to the first 300 MWA that applies to Schedules 485, 489, 490, 491, 492, and 495. Beginning with the September 2004 Enrollment Period C, Customers have a minimum five-year option and a fixed three-year option.

ENROLLMENT PERIODS

ENROLLMENT PERIODS	MINIMUM FIVE-YEAR OPTION
Enrollment Period A:	January 1, 2003 through December 31, 2007
Enrollment Period B:	January 1, 2004 through December 31, 2008
Enrollment Period C:	January 1, 2005 through December 31, 2009
Enrollment Period D:	January 1, 2006 through December 31, 2010
Enrollment Period E:	January 1, 2007 through December 31, 2011
Enrollment Period F:	January 1, 2008 through December 31, 2012
Enrollment Period G:	January 1, 2009 through December 31, 2013
Enrollment Period H:	January 1, 2010 through December 31, 2014
Enrollment Period I:	January 1, 2011 through December 31, 2015
Enrollment Period J:	January 1, 2012 through December 31, 2016
Enrollment Period K:	January 1, 2013 through December 31, 2017
Enrollment Period L:	January 1, 2014 through December 31, 2018
Enrollment Period M:	January 1, 2015 through December 31, 2019
Enrollment Period N:	January 1, 2016 through December 31, 2020

(N)

SCHEDULE 485 (Continued)

ENROLLMENT PERIODS (Continued)

ENROLLMENT PERIODS	FIXED THREE-YEAR OPTION
Enrollment Periods A and B:	This option was not available.
Enrollment Period C:	January 1, 2005 through December 31, 2007
Enrollment Period D:	January 1, 2006 through December 31, 2008
Enrollment Period E:	January 1, 2007 through December 31, 2009
Enrollment Period F:	January 1, 2008 through December 31, 2010
Enrollment Period G:	January 1, 2009 through December 31, 2011
Enrollment Period H:	January 1, 2010 through December 31, 2012
Enrollment Period I:	January 1, 2011 through December 31, 2013
Enrollment Period J:	January 1, 2012 through December 31, 2014
Enrollment Period K:	January 1, 2013 through December 31, 2015
Enrollment Period L:	January 1, 2014 through December 31, 2016
Enrollment Period M:	January 1, 2015 through December 31, 2017
Enrollment Period N:	January 1, 2016 through December 31, 2018

(N)

**SCHEDULE 489
LARGE NONRESIDENTIAL
COST-OF-SERVICE OPT-OUT
(>4,000 kW)**

AVAILABLE

In all territory served by the Company.

APPLICABLE

To each Large Nonresidential Customer whose Demand has exceeded 4,000 kW more than once within the preceding 13 months and who has chosen the Company's transition plan during one of the enrollment periods specified below. To obtain service under this schedule, Customers must enroll a minimum of 1 MWa determined by a demonstrated usage pattern such that projected usage for a full 12 months is at least 8,760,000 kWh (1 MWa) from one or more Points of Delivery (POD). Each POD must have a Facility Capacity of at least 250 kW. Service under this schedule is limited to the first 300 MWa that applies to Schedules 485, 489, 490, 491, 492, and 495. Beginning with the September 2004 Enrollment Period C, Customers have a minimum five-year option and a fixed three-year option.

ENROLLMENT PERIODS

<u>ENROLLMENT PERIODS</u>	<u>MINIMUM FIVE-YEAR OPTION</u>
Enrollment Period A:	January 1, 2003 through December 31, 2007
Enrollment Period B:	January 1, 2004 through December 31, 2008
Enrollment Period C:	January 1, 2005 through December 31, 2009
Enrollment Period D:	January 1, 2006 through December 31, 2010
Enrollment Period E:	January 1, 2007 through December 31, 2011
Enrollment Period F:	January 1, 2008 through December 31, 2012
Enrollment Period G:	January 1, 2009 through December 31, 2013
Enrollment Period H:	January 1, 2010 through December 31, 2014
Enrollment Period I:	January 1, 2011 through December 31, 2015
Enrollment Period J:	January 1, 2012 through December 31, 2016
Enrollment Period K:	January 1, 2013 through December 31, 2017
Enrollment Period L:	January 1, 2014 through December 31, 2018
Enrollment Period M:	January 1, 2015 through December 31, 2019
Enrollment Period N:	January 1, 2016 through December 31, 2020

(N)

SCHEDULE 489 (Continued)

ENROLLMENT PERIODS (Continued)

<u>ENROLLMENT PERIODS</u>	<u>FIXED THREE-YEAR OPTION</u>
Enrollment Periods A and B:	This option was not available.
Enrollment Period C:	January 1, 2005 through December 31, 2007
Enrollment Period D:	January 1, 2006 through December 31, 2008
Enrollment Period E:	January 1, 2007 through December 31, 2009
Enrollment Period F:	January 1, 2008 through December 31, 2010
Enrollment Period G:	January 1, 2009 through December 31, 2011
Enrollment Period H:	January 1, 2010 through December 31, 2012
Enrollment Period I:	January 1, 2011 through December 31, 2013
Enrollment Period J:	January 1, 2012 through December 31, 2014
Enrollment Period K:	January 1, 2013 through December 31, 2015
Enrollment Period L:	January 1, 2014 through December 31, 2016
Enrollment Period M:	January 1, 2015 through December 31, 2017
Enrollment Period N:	January 1, 2016 through December 31, 2018

(N)

**SCHEDULE 490
LARGE NONRESIDENTIAL
COST-OF-SERVICE OPT-OUT
(>4,000 kW and Aggregate to >100 MWa)**

AVAILABLE

In all territory served by the Company.

APPLICABLE

To each Large Nonresidential Customer who meet the following conditions: 1) Individual account demand has exceeded 4,000 kW at least twice within the preceding 13 months, or with seven months or less of service has had a Demand exceeding 4,000 kW; and 2) where combined usage of all accounts meeting condition 1 for the Large Nonresidential Customer aggregate to at least 100MWa in a calendar year; and 3) the customer maintains a load factor of 80% or greater for each account; and 4) who has chosen the Company's transition plan during one of the enrollment periods specified below.

To obtain service under this schedule, Customers must enroll a minimum of 1 MWa determined by a demonstrated usage pattern such that projected usage for a full 12 months is at least 8,760,000 kWh (1 MWa) from one or more Points of Delivery (POD). Each POD must have a Facility Capacity of at least 250 kW. Service under this schedule is limited to the first 300 MWa that applies to this and Schedules 485 489, 490, 491, 492, and 495. Customers have a minimum five-year option and a fixed three-year option.

ENROLLMENT PERIODS

<u>ENROLLMENT PERIODS</u>	<u>MINIMUM FIVE-YEAR OPTION</u>
Enrollment Period A through L:	This option was not available.
Enrollment Period M:	January 1, 2015 through December 31, 2019
Enrollment Period N:	January 1, 2016 through December 31, 2020

(N)

<u>ENROLLMENT PERIODS</u>	<u>FIXED THREE-YEAR OPTION</u>
Enrollment Periods A through L:	This option was not available.
Enrollment Period M:	January 1, 2015 through December 31, 2017
Enrollment Period N:	January 1, 2016 through December 31, 2018

(N)