



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

December 9, 2013

Diane Davis
Rules Coordinator
Public Utility Commission of Oregon
PO Box 1088
Salem, Oregon 97308-1088

RE: AR 555 - PGE's Comments on Oregon Administrative Rule (OAR) Changes for 860-038-0005 & 860-038-0300

Portland General Electric Company (PGE) appreciates the opportunity to provide comments regarding the proposed rule changes to OAR 860-038-0005 and OAR 860-038-0300. We are in general agreement with the rule changes except for the following proposed changes.

First, after further review, we are concerned that the data does not exist to satisfy the requirement to report spent nuclear fuel in mg/kWh. The revised language in 860-038-0300 (6) states:

Environmental impact must be reported for all retail electric consumers using the annual emission factors for the most recent available calendar year applied to the expected production level for each source of supply included in the electricity product. Environment impacts reported must include at least:

- (a) Carbon dioxide, measured in lbs./kWh of CO₂ emissions;
- (b) Sulfur dioxide, measured in lbs./kWh of SO₂ emissions;
- (c) Nitrogen oxides, measured in lbs./kWh of NO_x emissions;
- (d) Mercury, measured in lbs/kWh of Hg emissions; and
- (e) Spent nuclear fuel measured in mg/kWh of spent fuel.

A simple solution would be to eliminate subpart (e) from the rules and include a reference that directs consumers to the Nuclear Regulatory Commission website for information about nuclear waste in the section on the labeling bill insert that also directs the consumer to the Environmental Protection Agency website for Information about greenhouse gas emissions. This proposal could be further refined in the "prescribed by the Commission" process that is referenced in OAR 860-

038-0300(2). We also note that nuclear power is a very small percentage of the Northwest regional resource mix and is not a carbon intensive source of generation. The primary goal of the renewable power rate options is to reduce greenhouse gas emissions. In the Northwest region, renewable power does not have a significant impact on the production of nuclear waste.

Second, we are concerned that the rules, if adopted alone, will create uncertainty regarding the frequency with which utilities are required to provide information to our customers. The proposed rule changes eliminate the specific timing references in the rules (OAR 860-038-0300(2) and (3)) and replace them with the general reference "consistent with the requirements and frequency prescribed by the Commission." We understand that Staff proposes to initiate a separate proceeding in which the Commission will determine the "requirements and frequency" for providing the required information to our customers. To provide greater certainty we suggest that the rule changes become effective concurrent with the Commission's later determination regarding the requirements and frequency of communications with our customers. We reserve comments regarding the Commission determination of the requirements and frequency of communications not included in the proposed rule changes. We will provide any such comments in the related Commission proceeding.

Thank you for the opportunity to comment on the proposed rules. If you have any questions, please contact Bruce Werner at (503) 464-7481. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com.

Sincerely



Karla Wenzel
Manager, Pricing and Tariffs

Cc: AR 555 Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document **PGE's Comments on Oregon Administrative Rule (OAR) Changes for 860-038-0005 & 860-038-0300** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. AR 555.

DATED at Portland, Oregon, this 9th day of December, 2013.



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