



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

May 18, 2012

Via Electronic Filing and Courier

Oregon Public Utility Commission

Attention: Filing Center

550 Capitol Street NE, #215

PO Box 2148

Salem OR 97308-2148

Re: UM 1535

Attention Filing Center:

Enclosed for filing in the above-captioned docket are an original and five copies of Reply Comments of Portland General Electric Company ("PGE").

Please note that the Comments regard PGE Owner's Costs, which we have designated as subject to General Protective Order No. 11-097. Because the Comments contain extensive reference to and discussion of the information designated as protected, public disclosure of any portion of the Comments may compromise the protected nature of the protected information. Therefore, PGE is only providing these Comments as a confidential filing and is not providing any redacted copies to the parties or to the Commission. Hard copies of the Comments are being delivered to the Commission via courier and delivered via U.S. Mail to those parties who have executed the Protective Order.

This cover letter and certificate of service are being filed by electronic mail with the Filing Center.

An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided. Thank you in advance for your assistance.

Sincerely,

V. DENISE SAUNDERS
Associate General Counsel

VDS:cbm

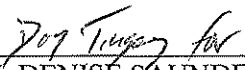
Enclosures

cc: UM 1535 Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **REPLY COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY** to be served by electronic mail to those parties on the attached service list for OPUC Docket UM 1535, with only those individuals qualified to receive confidential material receiving the confidential paper copy of the filing by First Class U.S. Mail, postage prepaid and properly addressed.

Dated at Portland, Oregon, this 18th day of May, 2012.



V. DENISE SAUNDERS, OSB # 903769
Associate General Counsel
PORTLAND GENERAL ELECTRIC COMPANY
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(541) 752-9060 (telephone)
(503) 464-2200 (telecopier)
denise.saunders@pgn.com

**SERVICE LIST –
OPUC DOCKET # UM 1535**

Matt Krumenauer, Senior Policy Analyst (C) OREGON DEPARTMENT OF ENERGY Matt.krumenauer@state.or.us	Vijay A. Satyal, Senior Policy Analyst (C) OREGON DEPARTMENT OF ENERGY vijay.a.satyal@state.or.us
Harold T. Judd ACCION GROUP, INC. hjudd@acciongroup.com	J. Laurence Cable (C) CABLE HUSTON BENEDICT, ET AL lcable@cablehuston.com
Richard Lorenz (C) CABLE HUSTON BENEDICT, ET AL rlorenz@cablehuston.com	Gordon Feighner (C) CITIZENS' UTILITY BOARD gordon@oregoncub.org
G. Catriona McCracken (C) CITIZENS' UTILITY BOARD catriona@oregoncub.org	Bob Jenks (C) CITIZENS' UTILITY BOARD bob@oregoncub.org
Irion Sanger (C) DAVISON VAN CLEVE mail@dvclaw.com	S. Bradley Van Cleve (C) DAVISON VAN CLEVE mail@dvclaw.com ; bvc@dvclaw.com
Janet L. Prewitt, Assistant AG (C) DEPARTMENT OF JUSTICE NATURAL RESOURCES SECTION Janet.prewitt@doj.state.or.us	John W. Stephens ESLER STEPHENS & BUCKLEY stephens@eslerstephens.com mec@eslerstephens.com
Wendy Gerlitz, (C) NW ENERGY COALITION wendy@nwenergy.org	Robert D. Kahn NW INDEPENDENT POWER PRODUCERS COALITION rkahn@nippc.org ; rkahn@rdkco.com
Erik Colville (C) OREGON PUBLIC UTILITY COMMISSION erik.colville@state.or.us	Stephanie S. Andrus, Assistant AG (C) DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION stephanie.andrus@state.or.us
Donald W. Schoenbeck (C) REGULATORY & COGENERATION SERVICES, INC. dws@r-c-s-inc.com	Megan Walseth Decker RENEWABLE NW PROJECT megan@rnp.org
Jimmy Lindsay RENEWABLE NW PROJECT jimmy@rnp.org	Gregory M. Adams (C) RICHARDSON & O'LEARY greg@richardsonandoleary.com
Peter J. Richardson (C) RICHARDSON & O'LEARY peter@richardsonandoleary.com	Chuck Sides TEPPER, LLC chucksides@mgoregon.com