

Portland General Electric Company Legal Department 121 SW Salmon Street • Portland, Oregon 97204 (503) 464-8926 • Facsimile (503) 464-2200 **Douglas C. Tingey** Associate General Counsel

October 9, 2014

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission Attention: Filing Center PO Box 1088 Salem OR 97308-1088

Re: UE 286 – PGE's Net Variable Power Costs and Annual Power Cost Update Second Partial Stipulation

Attention Filing Center:

On behalf of Portland General Electric Company ("PGE"), Staff of the Public Utility Commission of Oregon, the Citizen's Utility Board of Oregon, and the Industrial Customers of Northwest Utilities, PGE is filing an original and one copy of the attached **Motion to Correct Order**.

A copy of this filing has been served on all parties on the UE 286 service list.

Thank you in advance for your assistance.

Sincerely,

Douglas C. Tingey Associate General Counsel

DCT:qal Enclosures cc: Service List-UE 286

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 286

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY's

MOTION TO CORRECT ORDER

Net Variable Power Costs and Annual Power Cost Update

Pursuant to OAR 860-001-0420, Portland General Electric Company ("PGE"), Staff of the Public Utility Commission of Oregon ("Staff"), the Citizens' Utility Board of Oregon ("CUB"), and the Industrial Customers of Northwest Utilities ("ICNU") (collectively, the "Moving Parties") request that the Commission correct Order 14-318 issued in this docket on September 17, 2014.

MOTION

The Order adopted two partial Stipulations that collectively settled all contested issues in this docket. The Moving Parties are the same parties that entered into the two partial Stipulations. The Summary section of the Order states that the result of the adopted Stipulations is a reduction in Net Variable Power Costs ("NVPC") of approximately \$24.7 million. That dollar figure is incorrect. Only two of the agreed to adjustments had specific dollar amounts attached to them¹. Five of the other adjustments were modeling or modeling input changes that will impact NVPC but no dollar amount was stated because the ultimate effect of these changes will not be known until PGE's final MONET update

¹ Issues #5 and #8 in Order No. 14-318.

filing². The remaining issue did not have an agreed to adjustment, but rather parties agreed to hold a workshop no later than April 1, 2015³. The total NVPC impact of these adjustments is expected to be significantly less than the \$24.7 million stated in the Order.

To avoid possible confusion, the Moving Parties request that the Commission issue a revised or amended Order that removes from the Summary the specific dollar amount of the reduction, as shown below:

In this order, we adopt the stipulations of the parties regarding Portland General Electric Company's 2014 proposed Net Variable Power Costs (NVPC) and the Annual Power Cost Update (APCU) reducing the PGE NVPC rate request by approximately \$24.7 million, and order PGE to file new tariffs reflecting the modifications and conditions set forth in the stipulations.

No other changes to the Order are requested by the Moving Parties.

DATED this *day* of October, 2014.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC COMPANY

By:

Douglas C. Tingey, ÓSB No. 044366 Associate General Counsel 121 SW Salmon Street, 1WTC1301 Portland, Oregon 97204 (503) 464-8926 (phone) doug.tingey@pgn.com

ELLEN F. ROSENBLUM Attorney General

By:

Stephanie S. Andrus, OSB No. 92512 Senior Assistant Attorney General Of Attorneys for Staff of The Public Utility Commission Of Oregon State of Oregon, Defendant 116 Court St. NE Salem, OR 97301-4096 (503) 947-4520 (phone) Stephanie.andrus@doj.state.or.us

² Issues #2 through #4, #6 and #7 in Order No. 14-318.

³ Issue #1 in Order No. 14-318.

filing². The remaining issue did not have an agreed to adjustment, but rather parties agreed to hold a workshop no later than April 1, 2015³. The total NVPC impact of these adjustments is expected to be significantly less than the \$24.7 million stated in the Order.

To avoid possible confusion, the Moving Parties request that the Commission issue a revised or amended Order that removes from the Summary the specific dollar amount of the reduction, as shown below:

In this order, we adopt the stipulations of the parties regarding Portland General Electric Company's 2014 proposed Net Variable Power Costs (NVPC) and the Annual Power Cost Update (APCU) reducing the PGE NVPC rate request by approximately \$24.7 million, and order PGE to file new tariffs reflecting the modifications and conditions set forth in the stipulations.

No other changes to the Order are requested by the Moving Parties.

DATED this day of October, 2014.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC COMPANY

By:

Douglas C. Tingey, OSB No. 044366 Associate General Counsel 121 SW Salmon Street, 1WTC1301 Portland, Oregon 97204 (503) 464-8926 (phone) doug.tingey@pgn.com ELLEN F. ROSENBLUM Attorney General

By: StephanielS. Andrus, OSB No. 92512 Senior Assistant Attorney General Of Attorneys for Staff of The Public Utility Commission Of Oregon State of Oregon, Defendant 116 Court St. NE Salem, OR 97301-4096 (503) 947-4520 (phone) Stephanie.andrus@doj.state.or.us

² Issues #2 through #4, #6 and #7 in Order No. 14-318.

³ Issue #1 in Order No. 14-318.

Page 2 – UE 286 MOTION TO CORRECT ORDER

CITIZENS' UTILITY BOARD OF OREGON

By:

Catriona McCracken, OSB No. 933587 Sommer Templet, OSB No. 105260 610 SW Broadway, Ste. 400 Portland, OR 97205 (503) 227-1984 (phone) <u>Catriona@oregoncub.org</u> sommer@oregoncub.org

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

By:

S. Bradley Van Cleve, OSB No. 863066 Tyler C. Pepple, OSB No. 132256 Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 (phone) <u>bvc@dvclaw.com</u> tcp@dvclaw.com

CITIZENS' UTILITY BOARD OF OREGON

By:

Catriona McCracken, OSB No. 933587 Sommer Templet, OSB No. 105260 610 SW Broadway, Ste. 400 Portland, OR 97205 (503) 227-1984 (phone) Catriona@oregoncub.org sommer@oregoncub.org

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

By: Mh

S. Bradley Van Cleve, OSB No. 863066 Tyler C. Pepple, OSB No. 132256 Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 (phone) <u>bvc@dvclaw.com</u> tcp@dvclaw.com

CERTIFICATE OF SERVICE

I hereby certify that I served the Moving Parties **MOTION TO CORRECT ORDER** by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UE 286.

DATED at Portland, Oregon, this 9th day of October, 2014.

Quisha Light Regulatory Paralegal Portland General Electric Company 121 SW Salmon St., 1WTC1301 Portland, OR 97204 (503) 464-8866 (Telephone) (503) 464-2200 (Fax) quisha.light@pgn.com

SERVICE LIST – 10/09/14 OPUC DOCKET # UE 286

OPUC Dockets	E-Filing
CITIZENS' UTILITY BOARD OF OREGON	NORTHWEST NATURAL
dockets@oregoncub.org	efiling@nwnatural.com
Robert Jenks	Mark R Thompson
CITIZENS' UTILITY BOARD OF OREGON	NORTHWEST NATURAL
bob@oregoncub.org	<u>mark.thompson@nwnatural.com</u>
G. Catriona McCracken	Sarah Wallace
CITIZENS' UTILITY BOARD OF OREGON	PACIFIC POWER
catriona@oregoncub.org	sarah.wallace@pacificorp.com
S Bradley Van Cleve	Oregon Dockets
DAVISON VAN CLEVE PC	PACIFICORP, DBA PACIFIC POWER
<u>bvc@dvclaw.com</u>	oregondockets@pacificorp.com
Kevin Higgins	John Crider
ENERGY STRATEGIES LLC	PUBLIC UTILITY COMMISSION
<u>khiggins@energystrat.com</u>	john.crider@state.or.us
Gregory M. Adams	Michael T. Weirich
RICHARDSON ADAMS	PUC STAFF - DEPARTMENT OF JUSTICE
greg@richardsonadams.com	<u>michael.weirich@state.or.us</u>
Bradley Mullins	Stephanie S Andrus
MOUNTAIN WEST ANALYTICS	PUC STAFF - DEPARTMENT OF JUSTICE
<u>brmullins@mwanalytics.com</u>	stephanie.andrus@state.or.us
Greg Bass	Tyler Pepple
NOBLE AMERICAS ENERGY SOLUTIONS, LLC	DAVISON VAN CLEVE PC
gbass@noblesolutions.com	<u>tcp@dvclaw.com</u>