

Portland General Electric Company Legal Department 121 SW Salmon Street, 1WTC1301 Portland, Oregon 97204 Phone 503-464-7822 Fax 503-464-2200 portlandgeneral.com

April 30, 2024

VIA ELECTRONIC MAIL

Public Utility Commission of Oregon Attention: Filing Center 201 High Street SE, Suite 100 Salem, Oregon 97301 puc.filingcenter@puc.oregon.gov

Re: UE 430 - Investigation in New Load Connection Costs

Dear Filing Center:

Enclosed for filing in the above referenced docket is Portland General Electric Company's Motion for Extension for Time.

Sincerely,

l White

DW/ld

David F. White Managing Senior General Counsel

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

### UE 430

In the Matter of

# PORTLAND GENERAL ELECTRIC COMPANY,

Investigation into New Load Connection Costs.

PORTLAND GENERAL ELECTRIC COMPANY'S MOTION FOR EXTENTION OF TIME

Expedited Consideration Requested

Pursuant to OAR 860-001-0420, Portland General Electric Company (PGE) moves (Motion) the Oregon Public Utility Commission (Commission) for an order extending PGE's deadline for filing of the proposed tariff changes for new large load connections, currently due May 1, 2024.

### I. Introduction

The Administrative Law Judge Memorandum filed Dec 29, 2023 states PGE may file its proposed tariff in this docket on or before March 31, 2024. PGE requested and was granted an extension of the deadline to complete the proposed tariff filing from March 31, 2024 to May 1, 2024. PGE files this motion to request an extension of the deadline to October 31, 2024.

#### II. Discussion

PGE is requesting this extension to allow for adequate time for preparation and review of the proposed tariff changes for new large load connections because of the complexity of these issues and competing high workloads on other regulatory dockets that are impacting all parties in this docket. PGE requests additional time to file the proposed tariff changes until October 31, 2024, although PGE hopes to file sooner. Customers will not be prejudiced by this proposed delay because, pursuant to PGE's letter submitted in this docket on January 18, 2024, PGE has agreed to an interim approach that will require any agreement with new large load customers to include a provision that will require changes to the agreement to the extent necessary to conform to the requirements of a final order in this docket.

PGE has engaged in conversations with Commission Staff in connection with this Motion. As a result of those conversations, PGE and Commission Staff have come to the following understandings:

- PGE will provide Commission Staff and parties with a description of the scope of work for any outside consultant PGE engages in connection with this docket;
- Underlying data and assumptions used by any consultant engaged by PGE in this docket will be made available in this docket upon receipt of an appropriate data request subject to any applicable standard or modified protective order;
- PGE will participate in a UE 430 workshop that addresses the following topics:
  - Cost of Service Assumptions
  - o Reliability Requirements
  - Assumption of Revenues
  - Facility Cost Assumptions
  - Impact to the Bulk Electric System
- PGE understands that Commission Staff would like to discuss resource/power provisioning at the workshop. While PGE does not anticipate resource/power provisioning will be part PGE's proposal in the docket, it is willing to discuss Commission Staff's views on this topic at the workshop to the extent it is applicable.

Based upon these understandings, Commission Staff does not oppose PGE's Motion.

Counsel for PGE also communicated the relief requested in this Motion with counsel for the Alliance of Western Energy Consumers (AWEC) and the Oregon Citizens' Utility Board (CUB). AWEC does not oppose the Motion, and CUB has not made its position known to PGE.

PGE seeks expedited treatment and requests the time to respond to the Motion be shortened to one day.

#### II. Conclusion

For the reasons discussed above, good cause exists to extend the deadline for filing the proposed tariff changes. The Company respectfully requests that the Commission grant this motion for extension to allow PGE to submit its proposed tariff changes by Oct 31, 2024.

DATED this 30 day of April, 2024.

Respectfully Submitted By:

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