



Portland General Electric Company
Legal Department
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V. Denise Saunders
Associate General Counsel

December 17, 2014

Via Electronic Filing and U.S. Mail

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

**Re: UM ____ – Portland General Electric Company’s Application for Waiver of
OAR 860-029-0040**

Attention Filing Center:

Enclosed for filing in the above-referenced docket are an original and five (5) copies of Portland General Electric Company’s (“PGE”) Application for Waiver of OAR 860-029-0040, which requires an electric utility to file an update to its standard avoided cost rates within 30 days of Commission acknowledgement of its Integrated Resource Plan.

Communications regarding this Application should be addressed to:

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Manager, Rates & Regulatory Affairs
Portland General Electric Company
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Portland, Oregon 97204
(503) 464 - 8718
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Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink that reads "Denise Saunders". The signature is written in a cursive style with a large, sweeping "D" and "S".

V. DENISE SAUNDERS
Associate General Counsel

VDS:qal
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

IN THE MATTER OF

**PORTLAND GENERAL ELECTRIC
COMPANY,**

Application for Waiver of OAR 860-029-
0040.

**APPLICATION OF PORTLAND
GENERAL ELECTRIC COMPANY**

Under OAR 860-029-0005(4), Portland General Electric Company (“PGE” or “Company”) requests that the Public Utility Commission of Oregon (“Commission”) waive the compliance requirement contained in OAR 860-029-0040(4)(a), regarding the filing of standard rates for purchases from qualifying facilities (“QFs”). OAR 860-029-0040(4)(a) requires an electric company to file an update to its standard avoided cost rates within 30 days of Commission acknowledgement of its Integrated Resource Plan (“IRP”). However, this post-IRP update may be waived by the Commission at its discretion. In support of this application, PGE states as follows:

1. The rules governing interconnection agreements between electric utilities and qualifying cogeneration and small power production facilities are contained in OAR 860 Division 29. OAR 860-029-0005(4) allows the Commission to provide relief from the Division 29 rules for good cause shown. As further explained below, good cause exists to waive the requirement that PGE file an update to its avoided cost prices within 30 days after acknowledgement of its IRP.
2. On May 30, 2014, PGE filed an update to its Schedule 201 Qualifying Facility Information, as required by Order No. 14-058 and Order No. 11-505. After several workshops and exchanges with other parties to this docket, PGE filed multiple supplements to its original

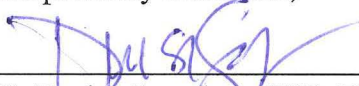
filing. The Company made the most recent supplemental filing on November, 25, 2014 and requested an extension of the effective date to December 17, 2014.

3. On December 2, 2014, this Commission acknowledged PGE's 2013 IRP, which triggered the post-IRP update requirements of OAR 860-029-0040(4)(a).
4. Pursuant to OAR 860-029-0040(4)(a), PGE would need to submit its updated avoided costs rates no later than January 2, 2016. However, on December 16, 2014, the Commission approved PGE's UM 1610 compliance filing, which contained all of the information required by 860-029-0040(4)(a).
5. There have been no material changes in the cost elements used to calculate avoided cost rates for PGE's compliance filing in UM 1610. Additionally, the deficiency period for both the standard and renewable avoided costs rates is identical.

For the reasons discussed above, PGE respectfully requests that the Commission issue an order waiving the OAR 860-029-0040(4)(a) requirement that PGE file a post-IRP update to its avoided costs rates.

DATED this 17th day of December, 2014.

Respectfully submitted,



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