Davison Van Cleve PC
Attorneys at Law
TEL (503) 241-7242 ● FAX (503) 241-8160 ● jog@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

June 2, 2017

Via Electronic Filing and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
2017 Request for a General Rate Revision
Docket No. UE 319

Dear Filing Center:

Please find enclosed the redacted version of the Opening Power Cost Testimony and Exhibit of Bradley G. Mullins on behalf of the Industrial Customers of Northwest Utilities ("ICNU").

The confidential portions of ICNU's testimony are being handled pursuant to Order No. 17-057 and will follow to the Commission via Federal Express.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the confidential portions of the **Opening Power Cost Testimony of the Industrial Customers of Northwest Utilities** upon the parties shown below by mailing a copy via First Class U.S. Mail, postage prepaid.

Dated at Portland, Oregon, this 2nd day of June, 2017

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

CITIZENS' UTILITY BOARD OF OREGON
Robert Jenks
Elizabeth Jones
610 SW Broadway, Suite 400
Portland, OR 97205
bob@oregoncub.org
liz@oregoncub.org

SMALL BUSINESS UTILITY ADVOCATES
James Birkelund
Small Business Utility Advocates
548 Market St., Suite 11200
San Francisco, CA 94104
james@utilityadvocates.org

Diane Henkels
Cleantech Law Partners PC
420 SW Washington St., Suite 400
Portland, OR 97204
dhenkels@cleantechlaw.com

FRED MEYER
Kurt J. Boehm
Boehm Kurtz & Lowry
36 E. Seventh St., Suite 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com

PUC STAFF - DEPARTMENT OF JUSTICE
Stephanie S. Andrus
Sommer Moser
PUC Staff – Dept. of Justice
Business Activities Section
1162 Court St. NE
Salem, OR 97301-4096
stephanie.andrus@state.or.us
sommer.moser@doj.state.or.us

PORTLAND GENERAL ELECTRIC COMPANY
Stefan Brown
Jay Tinker
121 SW Salmon
1WTC-0306
Portland, OR 97204
stefan.brown@pgn.com
pge.opuc.filings@pgn.com

CALPINE ENERGY
GREGORY M. ADAMS
RICHARDSON ADAMS, PLLC
P.O. BOX 7218
BOISE, ID 83702
greg@richardsonadams.com

WAL-MART
Vicki M. Baldwin
Parson Behle & Latimer
201 S. Main St., Suite 1800
Salt Lake City, UT 84111
vbaldwin@parsonbehle.com

Steve W. Chriss
Wal-Mart Stores, Inc.
2001 SE 10th St.
Bentonville, AR 72716
stephen.chriss@wal-mart.com

Kevin Higgins
Energy Strategies LLC
215 State St., Suite 200
Salt Lake City, UT 84111-2322
khiggins@energystrat.com

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 319

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC COMPANY,	)
	)
Request for a General Rate Revision.	)

OPENING POWER COST TESTIMONY OF

BRADLEY G. MULLINS

ON BEHALF OF

THE INDUSTRIAL CUSTOMERS

OF NORTHWEST UTILITIES

(REDACTED VERSION)

June 2, 2017

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Bradley G. Mullins, and my business address is 333 SW Taylor Street, Suite 400, Portland, Oregon 97204.

Q. PLEASE STATE YOUR OCCUPATION AND IDENTIFY THE PARTY ON WHOSE BEHALF YOU ARE TESTIFYING.

A. I am an independent consultant representing large energy and utility customers throughout the United States. I am appearing on behalf of the Industrial Customers of Northwest Utilities ("ICNU"). ICNU is a non-profit trade association whose members are large customers served by electric utilities throughout the Pacific Northwest, including customers of Portland General Electric Company ("PGE" or the "Company").

Q. PLEASE SUMMARIZE YOUR EDUCATION AND WORK EXPERIENCE.

A. A summary of my education and work experience can be found at ICNU/101.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. Pursuant to the Prehearing Conference Memorandum issued on March 15, 2017, by Administrative Law Judges Tracy A.G. Kirkpatrick and Ruth Harper, this matter was bifurcated into separate procedural schedules for general rate case issues and net variable power cost ("NVPC") issues. PGE's NVPC is collected through its Annual Update Tariff ("AUT"), Schedule 125. The purpose of my testimony is to address issues related to the Company's NVPC forecast of $353.6 million using the Multi-area Optimization Network

Energy Transaction ("MONET") model, as described in the Direct Testimony of Niman et al., or Exhibit PGE/300.[1/]

Q. WHAT WAS THE NATURE OF YOUR REVIEW OF THE COMPANY'S FILING?

A. I have reviewed the inputs of the Company into the MONET model, and have performed analysis of various aspects of the Company's filing. I have also issued several data requests and reviewed the Company's responses to those requests.

Q. DOES THIS FILING CONTAIN ADJUSTMENTS THAT YOU HAVE SUPPORTED IN PAST PROCEEDINGS?

A. Yes. The Company's filing includes the impact of several recommendations that ICNU has raised in prior proceedings. For example, the Company's filing includes an adjustment in the amount of $4.9 million to account for the California-Oregon Border Trading Margins issue I raised in the 2016 AUT.[2/] The Company's filing also includes a provision for an expected refund associated with the Portland Hydro Project in the amount of $9.4 million, an issue I raised in the 2017 AUT proceeding.[3/]

Q. WHAT ARE YOUR RECOMMENDATIONS IN THIS PROCEEDING?

A. Based on my review of the Company's filing, I recommend three adjustments to its power cost modeling in MONET.

First, I recommend that, consistent with stipulations in past AUT proceedings, the impacts of an extended outage at the Coyote Generating Facility be removed from the outage

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1/ PGE/300 at 1:14-15. The April 14, 2017 MONET Update of the Company reduced projected NVPC by $1 million. See April 14, 2017 Confidential Minimum Filing Requirements ("MFR"), "\ToPUC\ #M610PUC10-070-2018 GRC.xlsm", Tab "PwrCsOut," Cell "N249."

2/ In re PGE, Request for a General Rate Revision, Docket No. UE 294, ICNU/100 at 3:5-11:11 (May 28, 2015).

3/ In re PGE, 2017 Annual Power Cost Update Tariff, Docket No. UE 308, ICNU/100 at 3:1-6:2 (June 20, 2016).

rate for that facility in the MONET model. The impact of this adjustment is an approximate $2.3 million reduction to NVPC.

Second, I recommend that a planned outage for Carty be modeled during the month of [redacted], rather than the month of [redacted] The impact of this adjustment is an approximate $1.2 million reduction to NVPC.

Third, I recommend modeling oil costs at the Boardman Generating Facility based on the amounts of cost incurred in 2016, a period which better corresponds to the expected generation of the facility in the test period. The impact of this adjustment is an approximate $0.2 million reduction to NVPC.

I also recommend that the Company not be allowed to update hydro resource model inputs at a later point in this proceeding in connection with the Headwater Benefits Study.

II. COYOTE SPRINGS FORCED OUTAGE

Q. WHAT IS YOUR CONCERN WITH THE COYOTE SPRINGS FORCED OUTAGE RATE?

A. In 2013, Coyote Springs experienced an extended outage that lasted approximately [redacted].[4] The Company has proposed to include the impact of this extended outage in its NVPC forecast in this matter. I propose removing the impact of the extended outage that occurred in 2013 from the Coyote Springs outage rate calculation the Company used in its NVPC forecast.

[4] See MFR Vol 3 - Thermal\Thermal Forced Outage\Coyote Springs\ #CoyoteFORCalc_2017AUTApr_20150215.xlsx; See Also, April 14 MFR \Step Documentation\ Step 40 - Coyote FOR.

Q. HAS THE EXTENDED OUTAGE IN 2013 AT COYOTE SPRINGS BEEN CONTESTED IN PAST PROCEEDINGS?

A. Yes. In the 2016 AUT, Staff witness John Crider filed testimony contesting the inclusion of the extended outage in the forced outage rate calculation for Coyote Springs.[5/] The issue was resolved in that matter in a "black-box" settlement.[6/] Accordingly, it was not clear in that proceeding whether the Company would continue to include the 2013 data in the outage rate calculation in future filings.

Subsequently, in the 2017 AUT, the Company's initial filing included the extended 2013 outage in the forced outage rate of Coyote Springs.[7/] Mr. Crider, for Staff, and I, for ICNU, both contested the inclusion of the extended outage in the forced outage rate of Coyote Springs in that matter.[8/] That proceeding also was resolved in a stipulation where parties agreed to model Coyote Springs using a 7.0% outage rate as part of a broader settlement of issues, but did not require the Company to adhere to this outage rate in future proceedings.[9/]

Q. WHY DID MR. CRIDER PROPOSE A MODIFICATION TO THE OUTAGE RATE CALCULATION IN THE 2016 AUT?

A. Mr. Crider proposed to eliminate the 2013 data from the Coyote Springs outage rate calculation on the basis that it is an outlier.[10/] Using the same rationale established in Docket No. UM 1355 that requires the outage rate of coal facilities to exclude outlier years, Mr. Crider recommended calculating the outage rate for Coyote Springs in a manner that excludes 2013.[11/]

5/ Docket No. UE 294, Opening Testimony of John Crider, Staff/100 at 2:1-11:6 (May 28, 2015).
6/ Docket No. UE 294, Order No. 15-356, Appen. B at 4 (Nov. 3, 2015).
7/ See, e.g., Docket No. UE 308, ICNU/100 at 12:1-14:4.
8/ Docket No. UE 308, Staff/200 at 9:1-11:7; ICNU/100 at 12:1-14:4.
9/ Docket No. UE 308, Stipulation ¶ 5 (Aug. 18, 2016).
10/ Docket No. UE 294, Staff/100 at 9:11-13 (May 28, 2015).
11/ Id. at 10:8-20.

According to Mr. Crider, an outlier year, such as that experienced at Coyote Springs in 2013, is not necessarily representative of expected normalized conditions in the forecast period.[12/]

Q. DO YOU AGREE WITH MR. CRIDER'S RECOMMENDATIONS IN THE 2016 AUT?

A. I generally agree with the recommendation regarding the Coyote Springs outage detailed by Mr. Crider in the 2016 AUT and propose to implement his recommendation in this proceeding.

Q. IS IT GOOD RATEMAKING POLICY TO REMOVE THE IMPACTS OF EXTENDED OUTAGES FROM NORMALIZED POWER COST FORECASTS?

A. Yes. As a matter of normalization, the impacts of extended outages are best excluded from forward-looking power cost forecasts. As Mr. Crider noted in his 2016 AUT testimony, the Commission has previously recognized this concept by excluding extended outages from the assumed forced outage rates of coal units.[13/] The principle holds true for baseload gas resources as well. Base rates are more appropriately established under an assumption that the Company will be capable of operating its system without experiencing major unexpected outages. Embedding extended outages into an outage rate calculation in a power cost forecast is the equivalent of having an expectation that the Company will experience a major outage in the test period. While it certainly is possible that major outages may occur in the future, the Company's Power Cost Adjustment Mechanism is designed to accommodate the costs and risks associated with such outages.

12/ Id. at 9:14-10:7

13/ Id. at 3:17-4:10 (citing Docket No. UM 1355, Order Nos. 09-479 and 10-414).

Q. HOW DO YOU PROPOSE TO CALCULATE THE OUTAGE RATE FOR COYOTE SPRINGS IN THIS PROCEEDING?

A. Similar to my recommendation in the 2017 AUT, I propose to calculate the outage rate for Coyote Springs using the average equivalent forced outage rate ("EFOR") over the four years 2012, 2014, 2015, and 2016, excluding 2013. This calculation has been detailed in Table 2, below:

CONFIDENTIAL TABLE 1
<u>Proposed EFOR Calculation for Coyote Springs</u>

2012	[redacted]
2013	*exclude*
2014	[redacted]
2015	[redacted]
2016	[redacted]
Average	[redacted]

Q. WHAT IS THE IMPACT OF MODELING THIS OUTAGE RATE FOR COYOTE SPRINGS IN THE MONET MODEL?

A. The impact of using the outage rate calculation detailed in the above figure is a reduction to NVPC of approximately $2.3 million.

III. CARTY PLANNED OUTAGE SCHEDULING

Q. WHAT IS YOUR RECOMMENDATION RELATED TO OUTAGE SCHEDULING FOR THE CARTY GENERATING STATION?

A. As the Company's most economic resource, the Carty Generating Station should undergo planned maintenance in a way that minimizes costs to customers. For this reason, I recommend modeling the expected planned outage at the Carty Generating Station in 2018 in the month of [redacted], rather than the month of [redacted]. As a general principle, planned maintenance outages are most appropriately scheduled in a manner that results in the least cost to ratepayers. In this case, moving the outage from [redacted] to [redacted] results in an approximate $1.2 million reduction to NVPC, and thus, such a change is appropriately applied to the Company's filing.

Q. WHAT DEGREE OF CONTROL DOES THE COMPANY HAVE OVER THE TIMING OF PLANNED OUTAGES?

A. Unlike forced outages, where the Company has little control over the timing of when a plant is taken offline, planned outages represent major maintenance activities that are scheduled well in advance of when the generating facility will be taken offline. These sorts of major maintenance activities may occur periodically, and utilities will commonly schedule them in time periods when the outage will produce little to no additional cost on the utility system. For example, if a utility expects that prices will be sufficiently low in certain periods of the year when a resource will be offline anyway for economic reasons, the utility will often schedule planned maintenance activities during such periods, to avoid the opportunity costs of not being able to earn revenues relative to the market when the resource is offline.

Q. WHY IS IT IMPORTANT TO PLAN OUTAGES FOR THE CARTY GENERATING STATION AT THE MOST ECONOMICAL TIME?

A. The Carty Generating Station is the Company's most economic thermal resource with a heat rate of around 6,688 Btu/kWh,[14/] and thus, the timing of planned outages at the Carty Generating Station can have more significant impacts on power costs than other resources. The economic nature of the Carty Generation Station is relevant from the relatively high capacity factor of approximately [redacted]% simulated in the MONET model. To put it into perspective, the Company's Beaver and Boardman facilities respectively operate at a [redacted]%

14/ Docket No. 294 at PGE/300 at 6:13.

and [redacted]% capacity factor in the MONET model. Since the Carty Generating Station is economic in more hours of the year, the timing of planned outages at the Carty Generating Station has the potential to produce greater impacts on power costs than other resources. For those other resources, which are down most of the year for economic reasons, the timing of planned outages is less important.

Q. WHY IS THE [redacted] THE OPTIMAL MONTH TO CONDUCT OUTAGES AT CARTY?

A. [redacted]

IV. BOARDMAN OIL USE

Q. WHAT AMOUNT OF COSTS HAS THE COMPANY PROPOSED TO INCLUDE IN NVPC FOR OIL USED AT THE BOARDMAN GENERATING FACILITY?

A. The Company proposes to include approximately $[redacted] in costs associated with oil at the Boardman Generating Facility.

Q. HOW DID THE COMPANY FORECAST THE COST OF OIL FOR BOARDMAN?

A. The Company's forecast is not tied to the generation output at Boardman, but rather, is tied to a four-year average oil consumption over the period 2013 through 2016.

Q. DO YOU AGREE WITH THE COMPANY'S FORECAST?

A. No. In the test period, Boardman is expected to operate at a low capacity factor, relative to its average operations over the period 2013 through 2016. This can be noted in Confidential Table 2, below.

CONFIDENTIAL TABLE 2

Historical Generation Levels and Oil Consumption at Boardman

	2013	2014	2015	2016	2017 (p)
Generation Level					
Generation (MWh)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Capacity (MW)	570	570	570	570	570
Capacity Factor	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Oil Consumption					
Barrels Consumed	[redacted]	[redacted]	[redacted]	[redacted]	
Cost	[redacted]	[redacted]	[redacted]	[redacted]	

(p) = projected in MONET

As can be noted from Confidential Table 2, the Company currently forecasts generation levels at Boardman that correspond closely to the generation level experienced in 2016, in contrast to the average generation experienced over the four-year period. For that reason, it is less consistent to use the average cost of oil over the four-year period for the forecast, as the Company has done in its filing. This treatment of oil costs for Boardman also better corresponds to the way that the Company accounts for other chemical costs, which are generally tied to expected plant output rather than a historical, four-year average.

Q. WHAT DO YOU PROPOSE?

A. I recommend forecasting the amount of costs related to oil consumption at the Boardman generating facility based on the amount of oil consumed in 2016. This results in an oil cost forecast of approximately $[redacted]

Q. WHAT IS THE IMPACT OF YOUR RECOMMENDATION?

A. Forecasting oil consumption costs at Boardman based on the amount consumed in 2016 will reduce NVPC by approximately $0.2 million.

V. HEADWATER BENEFITS STUDY

Q. PLEASE EXPLAIN THE HEADWATER BENEFITS STUDY.

A. The Northwest Power Pool conducts a Headwater Benefits Study that uses historical streamflow to simulate output from Northwest hydroelectric resources. As explained in its testimony, the Company uses this study to develop the inputs to its MONET model for the Company's hydro resources.[15/] In its direct testimony, the Company stated that it was "currently validating the results"[16/] of the most recent Headwater Benefits Study and would include those results in its April MONET update.

Q. DID THE COMPANY INCLUDE THE RESULTS OF THE MOST RECENT HEADWATER BENEFITS STUDY IN ITS APRIL MONET UPDATE?

A. No. The Company stated that it has "yet to resolve an unexplained issue affecting the study results."[17/] The Company did not identify whether it planned to include the results of the study in a later MONET update, assuming it was able to resolve this "unexplained issue."

Q. DO YOU SUPPORT UPDATING THE HEADWATER BENEFITS STUDY IN THIS PROCEEDING?

A. No. As I understand, updating the Headwater Benefits Study impacts the amount of energy and capacity available from hydroelectric facilities in the MONET model simulation. The assumptions related to hydro output are relatively important inputs into the power cost simulations the Company performs with the MONET model. Accordingly, it would be unfair to parties to allow the Company to update this single aspect of its filing, after parties have had the opportunity to file responsive testimony. If the Company is allowed to modify resource

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15/ PGE/300 at 32:17-33:3.
16/ Id. at 32:21-33:3.
17/ PGE/1500 at 7:4.

attributes, such as those related to its hydro facilities, parties should have similar opportunities to propose modifications to resource attributes of other facilities as well.

At this stage in the proceeding, resource attributes should remain fixed. The fact that the Company was unable to complete its analysis of the Headwaters Benefit Study in time for its supplemental testimony is not a reason to incorporate that update at a later point in this proceeding.

Q. DOES THIS CONCLUDE YOUR OPENING POWER COST TESTIMONY?

A. Yes.

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 319

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC COMPANY,	)
	)
Request for a General Rate Revision.	)

EXHIBIT NO. ICNU/101

REGULATORY APPEARANCES OF BRADLEY G. MULLINS

Q. PLEASE PROVIDE A LIST OF YOUR REGULATORY APPEARANCES.

A. I have sponsored testimony in the following regulatory proceedings:

- Or.PUC, UM 1811: In re Portland General Electric Company, Application for Transportation Electrification Programs
- Or.PUC, UM 1810: In re Pacific Power & Light Company, Application for Transportation Electrification Programs
- Wa.UTC, UE-161204: In re Pacific Power & Light Company, Revisions to Tariff WN-U-75 (Net Removal Tariff)
- Wa.UTC, UE-161123: In re Puget Sound Energy's Revisions to Tariff WN U-60, Adding Schedule 451, Implementing a New Retail Wheeling Service
- Bonneville Power Administration, BP-18: 2018 Joint Power and Transmission Rate Proceeding
- Or.PUC, UP 334 (Cons.): In re Portland General Electric Company Application for Approval of Sale of Harborton Restoration Project Property
- Ar.PSC, 16-028-U: In re An Investigation of Policies Related to Renewable Distributed Electric Generation
- Ar.PSC, 16-027-R: In re Net Metering and the Implementation of Act 827 of 2015
- Ut.PSC, 16-035-01: In re the Application of Rocky Mountain Power for Approval of the 2016 Energy Balancing Account
- Wa.UTC, UE-160228, UG-160229: In re Avista Corporation Request for a General Rate Revision

- Wy.PSC, 20000-292-EA-16: In re the Application of Rocky Mountain Power to Decrease Current Rates by $2.7 Million to Recover Deferred Net Power Costs Pursuant to Tariff Schedule 95 and to Increase Rates by $50 Thousand Pursuant to Tariff Schedule 93
- Or.PUC, UE 307: In re PacifiCorp, dba Pacific Power, 2017 Transition Adjustment Mechanism
- Or.PUC, UE 308: In re Portland General Electric Company, 2017 Annual Power Cost Update Tariff (Schedule 125)
- Or.PUC, UM 1050: In re PacifiCorp, Request to Initiate an Investigation of Multi-Jurisdictional Issues and Approve an Inter-Jurisdictional Cost Allocation Protocol
- Wa.UTC, UE-152253: In re Pacific Power & Light Company, General rate increase for electric services
- Wy.PSC, 20000-469-ER-15 In The Matter of the Application of Rocky Mountain Power for Authority of a General Rate Increase in Its Retail Electric Utility Service Rates in Wyoming of $32.4 Million Per Year or 4.5 Percent
- Wa.UTC, UE-150204: In re Avista Corporation, General Rate Increase for Electric Services
- Wy.PSC, 20000-472-EA-15: In re the Application of Rocky Mountain Power to Decrease Rates by $17.6 Million to Recover Deferred Net Power Costs Pursuant to Tariff Schedule 95 to Decrease Rates by $4.7 Million Pursuant to Tariff Schedule 93

- Wa.UTC, UE-143932: Formal complaint of The Walla Walla Country Club against Pacific Power & Light Company for refusal to provide disconnection under Commission-approved terms and fees, as mandated under Company tariff rules
- Or.PUC, UE 296: In re PacifiCorp, dba Pacific Power, 2016 Transition Adjustment Mechanism
- Or.PUC, UE 294: In re Portland General Electric Company, Request for a General Rate Revision
- Or.PUC, UM 1662: In re Portland General Electric Company and PacifiCorp dba Pacific Power, Request for Generic Power Cost Adjustment Mechanism Investigation
- Or.PUC, UM 1712: In re PacifiCorp, dba Pacific Power, Application for Approval of Deer Creek Mine Transaction
- Or.PUC, UM 1719: In re Public Utility Commission of Oregon, Investigation to Explore Issues Related to a Renewable Generator's Contribution to Capacity
- Or.PUC, UM 1623: In re Portland General Electric Company, Application for Deferral Accounting of Excess Pension Costs and Carrying Costs on Cash Contributions
- Bonneville Power Administration, BP-16: 2016 Joint Power and Transmission Rate Proceeding
- Wa.UTC, UE-141368: In re Puget Sound Energy, Petition to Update Methodologies Used to Allocate Electric Cost of Service and for Electric Rate Design Purposes
- Wa.UTC, UE-140762: In re Pacific Power & Light Company, Request for a General Rate Revision Resulting in an Overall Price Change of 8.5 Percent, or $27.2 Million

- Wa.UTC, UE-141141: In re Puget Sound Energy, Revises the Power Cost Rate in WN U-60, Tariff G, Schedule 95, to reflect a decrease of $9,554,847 in the Company's overall normalized power supply costs
- Wy.PSC, 20000-446-ER-14: In re the Application of Rocky Mountain Power for Authority to Increase Its Retail Electric Utility Service Rates in Wyoming Approximately $36.1 Million Per Year or 5.3 Percent
- Wa.UTC, UE-140188: In re Avista Corporation, General Rate Increase for Electric Services, RE: Tariff WN U-28, Which Proposes an Overall Net Electric Billed Increase of 5.5 Percent Effective January 1, 2015
- Or.PUC, UM 1689: In re PacifiCorp, dba Pacific Power, Application for Deferred Accounting and Prudence Determination Associated with the Energy Imbalance Market
- Or.PUC, UE 287: In re PacifiCorp, dba Pacific Power, 2015 Transition Adjustment Mechanism.
- Or.PUC, UE 283: In re Portland General Electric Company, Request for a General Rate Revision
- Or.PUC, UE 286: In re Portland General Electric Company's Net Variable Power Costs (NVPC) and Annual Power Cost Update (APCU)
- Or.PUC, UE 281: In re Portland General Electric Company 2014 Schedule 145 Boardman Power Plant Operating Adjustment
- Or.PUC, UE 267: In re PacifiCorp, dba Pacific Power, Transition Adjustment, Five-Year Cost of Service Opt-Out (adopting testimony of Donald W. Schoenbeck).