

October 10, 2014

Public Utility Commission of Oregon Attn: Filing Center 3930 Fairview Industrial Drive SE P.O. Box 1088 Salem, OR 97308-1088

RE: Supplemental Filing of Advice No. 14-06, Renewable Resources Automatic Adjustment Clause

PGE submits this Supplemental Filing pursuant to Oregon Revised Statutes 756.010(8) and 757.205. PGE initially filed Advice No. 14-06 on March 31, 2014, with a requested effective date of January 1, 2015.

In addition to the electronic filing, enclosed is the original along with three courtesy copies with a requested effective date of <u>July 1, 2015</u>:

All sheets remain as previously filed.

Tenth Revision of Sheet No. 122-1 Tenth Revision of Sheet No. 122-2

On March 31, 2014, PGE filed proposed rates under Schedule 122, the Renewable Resources Automatic Adjustment Clause (RAC), and docket UE 288 was opened to address that filing. The filing indicated that PGE anticipated the Tucannon River Wind facility may be completed before the end of calendar year 2014, and the filing requested inclusion in Schedule 122 rates the 2014 costs and benefits of this new renewable generating facility. PGE had previously filed, on February 13, 2014, a general rate case, docket UE 283. The Tucannon River Wind facility was also addressed in that docket.

A Prehearing Conference was held on May 1, 2014 in docket UE 288. In part because the prudence of the Tucannon River Wind facility would be addressed in PGE's general rate case, the parties agreed to hold the RAC docket in abeyance pending resolution of the rate case docket. The ALJ found the request reasonable and stayed this docket. Three Stipulations have been filed in PGE's general rate case that together resolve all issues in that docket, including the prudence of the Tucannon River Wind facility. Those Stipulations have not yet been adopted by the Commission.

Construction of the Tucannon River Wind facility is on schedule, and PGE anticipates the plant may begin providing service to customers in December 2014.

Schedule 122 requires PGE to file, no later than April 1, revised rates under Schedule 122 and a summary of the proposed revenue requirements and charges for any new renewable resources. The tariff anticipates a Commission process to review the filing. The tariff also states:

By December 1, the Company will file the updated rates that are in compliance with the Commission's findings in the proceeding reviewing the April 1 filing.

Because UE 288 has been stayed at the parties' request, the Commission has not made findings. As a result, there is no December 1 update. For the same reason, the Schedule 122 rate change will not occur on January 1 as indicated in the tariff Advice Filing 14-06.

The total amount that may be subject to Schedule 122 in 2014 is relatively small. If, for example, the Tucannon River Wind facility comes on line December 15, 2014, PGE estimates that the revenue requirement for that date until December 31, 2014 to be about \$2 million. To facilitate the Commission making findings in UE 288, PGE is proposing to provide the final actual deferred revenue requirement associated with the December 2014 operating period of Tucannon in February 2015. PGE is proposing amortization of the deferred amount to occur no earlier than July 1, 2015.

For the reason stated above and because of the procedural posture of docket UE 288, PGE requests an extension of the tariff effective date to July 1, 2015.

Please direct any questions regarding this filing to Christopher Liddle at (503) 464-7458 or Marc Cody at (503) 464-7434.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

Jay Tinker

Director, Regulatory Policy & Affairs

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused PORTLAND GENERAL ELECTRIC COMPANY'S SUPPLEMENTAL FILING OF ADVICE NO. 14-06, RENEWABLE RESOURCES AUTOMATIC ADJUSTMENT CLAUSE, by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket Nos. UE 283 and UE 288.

DATED at Portland, Oregon, day of October 2014.

Sheryl Porter

Rates Assistant, Regulatory Affairs Portland General Electric Company 121 SW Salmon St., 1WTC0702 Portland, OR 97204

503-464-7580 Telephone

503-464-7651 Fax

Sheryl.porter@pgn.com

SERVICE LIST OPUC DOCKET # UE 283

| Judy Johnson (C) PUBLIC UTILITY COMMISSION OF OREGON judy.johnson@state.or.us | Stephanie S. Andrus (C) PUC – DEPARTMENT OF JUSTICE stephanie.andrus@state.or.us |
|--|--|
| Douglas C. Tingey (C) PORTLAND GENERAL ELECTRIC COMPANY doug.tingey@pgn.com | Jay Tinker (C) PORTLAND GENERAL ELECTRIC COMPANY pge.opuc.filings@pgn.com |
| OPUC Docket CITIZENS' UTILITY BOARD OF OREGON dockets@oregondub.org | Robert Jenks (C) CITIZENS' UTILITY BOARD OF OREGON bob@oregoncub.org |
| G. Catriona Mccracken (C) CITIZENS' UTILITY BOARD OF OREGON catriona@oregoncub.org | Greg Bass (C) NOBLE AMERICAS ENERGY SOLUTIONS gbass@noblesoultions.com |
| Kevin Higgins ENERGY STRATEGIES LLC khiggins@energystrat.com | Gregory Adams RICHARDSON ADAMS PLLC greg@richardsonadams.com |
| S Bradley Van Cleve (C) DAVISON VAN CLEVE PC bvc@dvclaw.com | Tyler C. Pepple DAVISON VAN CLEVE PC tcp@dvclaw.com |
| Bradley Mullins (C) DAVISON VAN CLEVE PC brmullins@mwanalytics.com | E-Filing NORTHWEST NATURAL efiling@nwnatural.com |
| Mark Thompson NORTHWEST NATURAL mark.thompson@nwnatural.com | Wendy Gerlitz NW ENERGY COALITION wendy@nwenergy.org |
| Nona Soltero FRED MEYER STORES/KROGER Nona.soltero@fredmeyer.com | Sarah Wallace PACIFIC POWER Sarah.wallace@pacificorp.com |
| David Tooze CITY OF PORTLAND David.tooze@portlandoregon.gov | Oregon Dockets PACIFICORP, DBA PACIFIC POWER oregondockets@pacificorp.com |
| Kurt Boehm BOEHM KURTZ & LOWRY kboehm@bkllawfirm.com Benjamin Walters | Jody Kyler Cohn BOEHM KURTZ & LOWRY jkyler@bkllawfirm.com |
| CITY OF PORTLAND Ben.walters@portlandoregon.gov | |

SERVICE LIST OPUC DOCKET # UE 288

| Stephanie S. Andrus (C) PUC – DEPARTMENT OF JUSTICE stephanie.andrus@state.or.us | John Crider PUBLIC UTILITY COMMISSION OF OREGON John.crider@state.or.us |
|---|---|
| Christopher Liddle (C) PORTLAND GENERAL ELECTRIC COMPANY Christopher.liddle@pgn.com | Jay Tinker (C) PORTLAND GENERAL ELECTRIC COMPANY pge.opuc.filings@pgn.com |
| OPUC Docket CITIZENS' UTILITY BOARD OF OREGON dockets@oregondub.org | Robert Jenks (C) CITIZENS' UTILITY BOARD OF OREGON bob@oregoncub.org |
| G. Catriona Mccracken (C) CITIZENS' UTILITY BOARD OF OREGON catriona@oregoncub.org | Bradley Mullins (C) DAVISON VAN CLEVE PC brmullins@mwanalytics.com |
| S Bradley Van Cleve (C) DAVISON VAN CLEVE PC bvc@dvclaw.com | Tyler C. Pepple DAVISON VAN CLEVE PC tcp@dvclaw.com |