

February 25, 2015

Via Electronic Filing and U.S. Mail

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

RE: UM-1422 – APPLICATION OF PORTLAND GENERAL ELECTRIC COMPANY FOR WAIVER OF OAR 860-038-0640

Enclosed for filing in the captioned docket are an original and one copy of:

• APPLICATION OF PORTLAND GENERAL ELECTRIC COMPANY FOR WAIVER OF OAR 860-038-0640, COMPLIANCE FILING REQUIREMENTS FOR 2015.

This being filed by electronic mail with the Filing Center.

If you have any questions or require further information, please contact Terri Bowman at 503-464-8854.

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

Sincerely,

Karla Wenzel

Manager, Pricing and Tariff

cc: CUB INCU

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

PO Box 1088 3930 Fairview Industrial Drive SE SALEM, 97308-1088

IN	THE MATTER OF THE APPLICATION OF Portland General Electric (UTILITY COMPANY)))		. APPLICATION		
то	TO WAIVE STATUTORY NOTICE.)						
NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.							
1.	GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)						
	PGE submits UM-1422 - Application of Portland General Electric Company for Waiver of OAR 860-038-0640, Compliance Filing Requirement for 2015. PGE hereby requests that the Commission waive the compliance requirements contained in OAR 8600-038-0640 that requires the Company, in odd numbered years, to engage an independent third party reviewer to prepare a report attesting to the Company's compliance with the Code of Conduct contained in OAR 860-038-0500 through OAR 860-038-0640 and file a report with the Commission by June 1 st of the audit year. PGE believes good cause exists for a waiver from the filing requirements as demonstrated within this filling.						
2.	APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)						
	Not applicable.						
3.	THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)						
	Not applicable.						
4.	REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:						
	A Waiver of Statutory Notice is requested due to the public meeting being on March 24, 2015 and requests an effective date of March 25, 2015.						
5.	REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S):						
The requested effective date is March 25, 2015.							
6,	AUTHORIZED SIGNATURE TIT			DATE			
Manager, /s/ Karla Wenzel		nager,	Pricing & Tariffs		February 25, 2015		
PUC USE ONLY							
APPROVED ☐ DENIED ☐ EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE							
AUTHORIZED SIGNATURE					D	ATE	

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM-1422

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY,

APPLICATION OF PORTLAND GENERAL ELECTRIC COMPANY

Application for Waiver of OAR 860-038-0640, Compliance Filing Requirements for 2015.

Pursuant to OAR 860-038-0001(4), PGE hereby requests that the Commission waive the compliance requirement contained in OAR 860-038-0640 that requires that the Company, in odd numbered years, to engage an independent third party reviewer to prepare a report attesting to the Company's compliance with the Code of Conduct contained in OAR 860-038-0500 through OAR 860-038-0640. The Code of Conduct is designed to protect against market abuses and anti-competitive practices by electric companies in Oregon's retail electricity markets. The Company must file the report with the Commission by June 1st of the audit year.

As discussed below, good cause exists for a waiver from the filing requirements contained in OAR 860-038-0640 and a waiver will cause no harm to PGE's customers, potential competitors, or to the Company. The Company proactively works to maintain an environment of awareness of the rules pertaining to the Code of Conduct and has a strong history of compliance with the rules. Moreover, PGE has few affiliates and an immaterial level of competitive operations. Hence, the circumstances that would typically warrant the type of audit and report required by the rules simply are not present. In addition, granting a waiver would not affect the Commission's ability to request information or investigate concerns.

A. Discussion

The waiver, if granted, will provide the Company as well as the Commission with an opportunity to deploy valuable resources to other important matters in 2015. Given PGE's demonstrated compliance with the Code of Conduct rules over the years, a 2015 compliance review is not likely to reveal deficiencies with compliance, nor present material opportunities for improved compliance.

The Code of Conduct sets forth specific standards in OAR 860-038-0520 through 860-038-0620. OAR 860-038-0640, adds the following requirement for which PGE is seeking a waiver:

By June 1 of each odd numbered year, an electric utility company must file a verified report prepared by an independent third party regarding the electric company's compliance with OAR 860-38-0500 through 86-038-0620 for the prior two calendar years.

The Company proactively works to ensure that the Company maintains an environment of awareness of, and compliance with, the Code of Conduct rules. The employees in PGE's competitive operations have an especially heightened awareness of the Code of Conduct and exercise vigilance in understanding and complying with it. The Company's efforts include providing biennial Code of Conduct compliance training, in the even numbered years, to key employees and selected workgroups on specific rules that pertain to their activities. PGE recently concluded its 2014 training to all targeted employees and Responsibility Centers (RC's) in which there was approximately 90% participation by targeted employees.

In addition to the training, the Company has subject matter experts (regulatory, legal) available to assist in answering coworker questions or concerns regarding the requirements of Division 38 Code of Conduct at any time.

Moreover, the Company has repeatedly shown that it complies with the Code of Conduct rules as demonstrated by external audits in the calendar years of 2003, 2005, 2007 and 2011.¹ No deficiencies or violations were noted in any of the calendar years in which audit reviews were conducted. Additionally, PGE is not aware of any complaints ever being filed with the Commission regarding the Company's compliance with the Code of Conduct rules.

To comply with OAR 860-038-0640, the Company must engage the services of an independent third party reviewer to verify the Company's compliance. This process has, in the past, included steps where key personnel are interviewed, critical processes reviewed, and the verified results filed in a prepared report to the Commission. The auditing effort has required, on a biennial basis, the Company to reallocate resources from other activities to coordinate, facilitate and engage in this review. Based on previous reporting preparations, an independent reviewer audit and report will cost more than \$100,000. Additionally, gathering requested material and arranging for interviews with Company personnel is a time consuming undertaking. Granting a waiver of 860-038-0640, will allow the Company and the Commission to more effectively apply available resources to other important matters during the time that would otherwise be spent on the review and reporting process in 2015.

History supports the Company's request for the waiver. The Company has submitted the required report in 2003, 2005, 2007 and 2011. With each report, the independent auditor/reviewer assessed the Company's compliance with the OARs and the Company submitted the findings to the Commission. Each report shows that PGE has complied with the rules from the time they went into effect in 2001. By way of example, PGE has included as Attachment A, a summary illustrating how the Company complies with each of the applicable rules.

Page 3 Application of Portland General Electric Company for Waiver of OAR 860-038-0640 for 2015

¹ In 2009 and 2013, the Commission granted PGE a waiver from the independent verification requirements in 860-038-0640.

Finally, an important reason for requiring the report (i.e. the presence of Oregon affiliates and robust competitive or non-regulated operations) does not apply in PGE's case as PGE had fewer than 4 Oregon affiliates² during the time period that would be covered by the report. None of PGE's affiliates are involved in the provision of electricity services. The extent of PGE's competitive operations is likewise immaterial. In 2014, non-utility (competitive) revenues were slightly under \$7 million or under 1% of regulated revenues.

Given the immaterial level of competitive operations, combined with the Company's proactive efforts to train employees on the code of conduct requirements and the Company's solid compliance history it does not appear that the circumstances are present that might warrant the expense and drain on resource associated with the audit and report. The Company further notes that this waiver would not affect the Commission's ability to request information or investigate concerns.

B. Communications

Communications regarding this Application should be addressed to the following email address: pge.opuc.filings@pgn.com

Please mail hardcopies to:

Karla Wenzel

Portland General Electric Company

121 SW Salmon Street, 1WTC0702

Portland, OR 97204

Telephone:

503-464-8718

E-Mail:

Karla.Wenzel@pgn.com

Denise Saunders

Portland General Electric Company

121 SW Salmon Street, 1WTC0701

Portland, OR 97204

Telephone:

503-464-7181

Denise.Saunders@pgn.com

² These affiliates are: Salmon Springs Hospitality Group; 121 SW Salmon Corp; PGE Foundation; and WTC NW. .

C. Conclusion

As discussed above, good cause exists to waive the requirements under OAR 860-380-0640. The Company's reporting history, its commitment to on-going training and awareness efforts, and the Commission's review of PGE's compliance reporting in 2003, 2005 and 2007, 2011 demonstrate the Company's adherence to the Code of Conduct. Moreover, PGE's immaterial level of affiliates and competitive operations indicates that the circumstances that might warrant the independent report required by the rule are not present. A waiver will allow the Company and Commission Staff to deploy resources to other matters in 2015 and will cause no harm to our customers, potential competitors or to the Company.

For all of the reasons described above, the Company requests that Commission approve the request for waiver from the requirements of OAR 860-038-0640 as described herein.

DATED this 24 day of Eb., 2015.

Respectfully submitted,

Portland General Electric Company 121 SW Salmon Street, 1WTC0702

Portland, OR 97204

Telephone:

503-464-7021

E-Mail:

pge.opuc.filings@pgn.com

ATTACHMENT A

Demonstration of Compliance to Rules

860-038-0520 - Electric Company Name and Logo

An electric company may allow its Oregon affiliates and its competitive operations the use of its corporate name, trademark, brand, or logo in advertisements of specific electricity services to existing or potential consumers located within the electric company's service area, as long as the Oregon affiliate or its competitive provider includes a disclaimer in its communications. The disclaimer must be written in a bold and conspicuous manner or be clearly audible, as appropriate for the communication medium. The disclaimer must be included in all print, auditory and electronic advertisements.

PGE has processes and procedures in place to ensure that the required disclaimers are provided in all marketing materials of competitive operations. PGE's Corporate Communications and Legal Departments review materials before they are released to ensure appropriate disclaimers are used. The disclaimers are conspicuous and bold; and where marketing materials are communicated audibly, the disclaimer is clearly audible.

(1) The disclaimer for an Oregon affiliate must state the following: {Name of Oregon affiliate} is not the same company as {name of electric company} and is not regulated by the Public Utility Commission of Oregon. You do not have to buy {name of Oregon affiliate}'s products or services to continue to receive your current electricity service from {name of electric company}.

PGE has no Oregon affiliates that provide electricity services.

(2) The disclaimer for a competitive operation must state the following: 'You do not have to buy {product/service name} to continue to receive your current electricity service from {name of electric company}.'

PGE's disclaimers for its competitive operations read: 1) "You do not have to buy (this product/service) to continue to receive your current electricity services form PGE, and, 2) You may purchase (this product/service) from other providers." An example is attached as Attachment B.

860-038-0560 - Treatment of Competitors

- (1) An electric company shall treat the competitors of its Oregon affiliates and its competitive operations fairly in all respects and in a manner consistent with the treatment it affords any of its Oregon affiliates or competitive operations in the electric Company's:
- (a) Provision of supply;
- (b) Provision of capacity;
- (c) Provision of electricity services;
- (d) Provision of information obtained as a result of providing either electric service to its nondirect access customers within its allocated service territory, or transmission and distribution services to direct access customers;
- (e) Offering of discounts;
- (f) Tariff discretion; and
- (g) Processing requests for electricity related services. This section shall not apply to the provision or joint purchasing of corporate services such as accounting, auditing, financial, legal, or information technology services.

PGE treats the competitors of its competitive operations fairly in all respects and in a manner consistent with the treatment it affords any of its competitive operations in the items listed in (1)(a)through (g) of the rule. PGE has a Direct Access Operations Office that manages the relationships with ESSs registered in PGE's service territory. In addition, PGE regularly trains employees on the requirements of this rule. PGE's compliance with this requirement is evidenced by the lack of complaints from consumers or competitors regarding unfair treatment related to this provision. Additionally, PGE files an Affiliated Interest Report with the Commission on June 1st of each year reporting on all transactions between PGE and its affiliates.

(2) An electric company shall not condition or otherwise tie the provision of any regulated services provided by the electric company, nor the availability of discounts of rates or other charges or fees, rebates, or waivers of terms and conditions of any regulated services provided by the electric company, to the taking of any electricity services or directly related products from its Oregon affiliates or competitive operations.

PGE does not condition or otherwise tie the provision of any of its regulated services, nor the availability of discounts of rates or other charges or fees, rebates, or waivers of terms and conditions of any of its regulated services to the taking of any electricity services from its competitive operations. PGE regularly trains employees on the requirements of this rule.

(3) An electric company shall not assign a consumer to whom it currently provides electricity services to any of its Oregon affiliates or competitive operations, whether by default, direct assignment, option, or by any other means, unless that means is equally available to all competitors.

PGE has never assigned a consumer to whom it currently provides electricity services to any of its competitive operations, whether by default, direct assignment, option, or by any other means. PGE regularly trains employees on the requirements of this rule.

860-038-0580 - Prevention of Cross-subsidization Between Competitive Operations and Regulated Operations

(1) Other than information that is routinely made public by an electric company, or for which a tariff has been approved subject to OAR 860-086-0020, an electric company must not provide electric company operational or marketing information to its competitive operations unless it makes such information available to ESSs and other entities that provide electricity services or directly related products on identical terms and conditions.

PGE does not provide operational or marketing information to its competitive operations unless it makes such information available to ESSs and other entities that provide electricity services or directly related products on identical terms and conditions PGE regularly trains employees on the requirements of this rule.

(2) The electric company must identify and separately account for revenues and costs of its competitive operations.

PGE's accounting practices support the prevention of cross-subsidization by using separate accounts for all Competitive Operations; identified with an "X"; referred to as "X" accounts. PGE employees working on activities for a Competitive Operation charge their labor (in 30 minute intervals), related business expenses, any costs paid to vendors for products and services or items issued from PGE's storerooms related to a Competitive Operation to a 'non-utility' account.

The "X" represents multiple variables; and it is the first four numbers in an account that ensures activities are accounted for as a non-utility:

41600XX - Costs and expenses of merchandising, jobbing and contract work

41710XX - Expenses of nonutility operations

41800XX – Non-operating rental expense

42100XX - Miscellaneous non-operating expense

42640XX - Expenditures for certain civic, political and related activities

42650XX - Other non-operating deductions

860-038-0590 - Transmission and Distribution Access

(1) An electric company may be relieved of some or all of the requirements of this rule by placing its transmission facilities under the control of a regional transmission organization consistent with FERC Order No. 2000 and obtaining Commission approval of an exemption.

PGE has not placed its transmission facilities under the control of a regional transmission organization.

(2) An ESS may request transmission service, distribution service or ancillary services under standard Commission tariffs and FERC-approved tariffs. The electric company shall coordinate the filings of these tariffs to ensure that all retail and direct access consumers are offered comparable services at comparable prices.

PGE has a FERC approved Open Access Transmission Tariff (OATT), which provides the terms and conditions under which PGE will provide firm and non-firm point-to-point transmission services as well as the rates that will be charged for ancillary services such as energy imbalance, scheduling, system control and dispatch service, reactive supply and voltage control from general sources, regulation and frequency response, and operating reserved for spinning and supplemental reserve service. The OATT serves as the guide to PGE's established business practices. An ESS may request transmission service or ancillary services under the OATT. The OATT is available online at http://www.oatioasis.com/PGE/.

PGE also has an Electricity Service Suppliers' Guide which in Chapter 5 explains the process an ESS uses to deliver electricity to a direct access customer in PGE's service area, including the process for acquiring transmission, distribution and ancillary services. The Guide is available at the following link:

https://www.portlandgeneral.com/contact_us/direct_access_operations/ess_guide.aspx

(3) Each electric company shall provide nondiscriminatory access to transmission, distribution and ancillary services, including transmission into import-limited areas and local generation resources within import-limited areas, to serve all retail consumers. An electric company shall not give preference or priority in transmission and distribution pricing, transmission and distribution access, or access to, pricing of, or provision of ancillary services and local generation resources, to itself or its affiliate relative to persons or entities requesting transmission or distribution access to serve direct access consumers. No preference or priority may be given to, nor any different obligation assigned to, any consumer based solely on whether the consumer is purchasing service from an electric company or an ESS.

PGE's resources are not in an import-limited area and are not subject to the first part of this rule. Consistent with its OATT, PGE does not provide any preference or priority to, nor does it assign any different obligation to, any consumer based solely on whether the consumer is purchasing service from an electric company or an ESS.

- (a) Any transmission or distribution capacity to which an electric company has entitlements, by ownership or by contract, for the purpose of serving its Oregon load shall be made available to an electric company and ESSs that are serving such load on at least a pro rata basis. An electric company shall describe in its tariff filings how it proposes to provide substantively comparable transmission and distribution service to all retail consumers at the same or similar rates if:
- (A) Access to the electric company's transmission or distribution facilities or entitlements is restricted by contract or by regulatory obligations in other jurisdictions; or
- (B) If providing transmission or distribution service on a pro rata basis would result in stranding generating capacity owned or provided through contract by the electric company;

PGE's FERC-approved OATT describes how PGE provides transmission service to all transmission customers, including ESSs.

- (b) Except for those ancillary services required by FERC to be purchased from an electric company, an ESS may acquire, on behalf of the retail loads for which it is responsible, all ancillary services required relative to the transmission of electricity by any combination of:
- (A) Purchases under the electric company's Open Access Transmission Tariff;
- (B) Self-provision; or
- (C) Purchases from a third party;

Section 3 of PGE's OATT implements this rule.

- (c) Energy imbalance obligations, including the pricing of imbalances and penalties for imbalances, shall be developed to reasonably minimize imbalances and to meet the needs of the direct access market environment. The electric company shall address such energy imbalance obligations in its proposed FERC tariffs. Energy imbalance obligations imposed upon ESSs, including the entity serving the standard offer load, and consumers purchasing service from the electric company, shall comply with the following:
- (A) The obligations shall impose substantively comparable burdens upon ESSs, including the entity serving the standard offer load, and consumers purchasing service from the electric company, and shall not unreasonably differentiate between consumers that are entitled to direct access on the basis of customer class, provider of the service, or type of access;
- (B) The obligations shall recognize the practical scheduling and operational limitations associated with serving retail consumer loads in the direct access environment, but shall require ESSs, including the entity serving the standard offer load, to make reasonable efforts to minimize their energy imbalances on an hourly basis;

- (C) The obligations shall be designed with the objective of deterring ESSs, including the entity serving the standard offer load, and consumers purchasing service from the electric company from burdening electric system operation or gaining economic advantage by under-scheduling, over-scheduling, under-generating or over-generating. The obligations shall not be punitive in nature; and
- (D) The obligations shall enable an electric company and ESSs, including the entity serving the standard offer load, to settle for energy imbalance obligations on a financial basis, unless otherwise mutually agreed to by the parties.

Schedule 4-R of PGE's OATT implements this rule.

(d) Where local generation is required to operate for electric system security or where there is insufficient transmission import capability to serve retail loads without the use of local generation, the electric company shall make services available from such local generation under its ownership or control to ESSs consistent with the electric company's provision of services to standard offer consumers, residential consumers, and other retail consumers. The electric company shall also specify such obligations in appropriate sales contracts prior to any divestiture of such resources;

This rule is not applicable to PGE as local generation is not required for PGE to operate for electric system security and there is sufficient transmission import capability to serve retail loads without the use of local generation,

(e) The electric company's tariffs shall specify prices, terms, and conditions for scheduling, billing, and settlement. Other functions may be specified as needed;

See Part III, Schedule 4-R, and Attachment N of PGE's OATT

(f) An electric company's tariffs shall include a dispute resolution process to resolve issues between the electric company and the ESSs that serve the retail load of an electric company in a timely manner. Such processes shall provide that unresolved disputes related to such retail access matters may be appealed to the Commission.

PGE's Rule K, Requirements Relating to ESS's, Section 16 states "The dispute resolution process is contained within the ESS Agreement."

(4) If adherence to OAR 860-038-0590 requires FERC approval of tariff or contract provisions, the electric company must petition FERC for the approval of the tariff or contract provisions within 90 days of the effective date of this rule. Subsequent tariffs or contracts requiring FERC approval will be made in a timely manner.

FERC has approved PGE's OATT.

860-038-0600 - Joint Marketing and Referral Arrangements

- (1) For joint marketing, advertising, and promotional activities an electric company shall not:
- (a) Provide or acquire leads on behalf of its Oregon affiliates;
- (b) Solicit business or acquire information on behalf of its Oregon affiliates;
- (c) Give the appearance of speaking or acting on behalf of its Oregon affiliates except that an electric company, pursuant to a customer request, may provide information about electricity services or directly related products offered by the electric company's Oregon affiliates. Prior to providing the information, the electric company must inform the customer that:
- (A) Other providers may exist; and
- (B) The customer does not have to purchase these electricity services or directly related products from the electric company's Oregon affiliate in order for the customer to continue to receive the customer's current electricity service from the electric company;
- (d) Represent to consumers or potential consumers that it can offer electricity services or directly related products from the electric company's Oregon affiliates bundled or packaged with its tariffed services; or
- (e) Request authorization from its consumers to pass on proprietary consumer information exclusively to its Oregon affiliates.
- (2) An electric company shall not engage in joint marketing, advertising, or promotion of its electricity services or directly related products with those of its Oregon affiliates in a manner that favors the electricity services or directly related products of the Oregon affiliate. Such joint marketing, advertising, or promotion includes, but is not limited to, the following:
- (a) Acting or appearing to act on behalf of its Oregon affiliates in any communications and contacts with any existing or potential consumers, subject to the exception in (1)(c) above;
- (b) Joint sales calls;
- (c) Joint proposals, either as requests for proposals or responses to requests for proposals;
- (d) Joint promotional communications or correspondence, except that an electric company may allow its Oregon affiliates access to consumer bill advertising inserts according to the terms of a Commission approved tariff, so long as access to such inserts is made available on the same terms and conditions to unaffiliated entities offering similar services as the Oregon affiliates that use bill inserts; or

- (e) Joint presentations at trade shows, conferences, or other marketing events within the state of Oregon.
- (3) An electric company may participate in meetings with its Oregon affiliates to discuss technical or operational subjects regarding the electric company's provision of transmission or distribution services to the consumer; but only in the same manner and to the same extent the electric company participates in such meetings with unaffiliated entities and their consumers.

This rule is not applicable to PGE as PGE has no affiliates that offer electricity services or directly related products.

860-038-0620 - Access to Books and Records

(1) An electric company must provide the Commission with full access to all of the electric Company's and affiliates' books and records in order to review all transactions between an electric company and its Oregon affiliates.

PGE provides the Commission with full access to all of its books and records

(2) An electric company and its affiliates shall maintain separate books and records, and, whenever possible, prepare unconsolidated financial statements.

As discussed above under OAR 860-038-0580, PGE uses an "X" ledger accounting practice all non-utility and non-operating activities; this approach provides a marked separation of utility and nonutility activities.

(3) An electric company and its competitive operations shall maintain sufficient records to allow for an audit of the transactions between an electric company and its competitive operations. At its discretion, the Commission may require an electric company to initiate, at the electric company's expense, an audit of the transactions between an electric company and its competitive operations performed by an independent third party.

As demonstrated by the prior audits conducted for the Commission under the Code of Conduct rules, PGE and its competitive operations maintain sufficient records to allow for an audit of the transactions between an electric company and its competitive operations.

ATTACHMENT B

860-038-0520 Disclaimer Examples

Clean Wind "Thank You"

Clean Wind "Webpage"

Residential

Business

Renewables & Efficiency

Safety & Outages

Economic Development

Community & Environment

Our Company

Business

PGE's Clean Wind renewable power for large and industrial accounts



View & Download Bills

One-check Payment

Manage Account Groups

Energy Pricing

Small Business

Medium & Large Business

Your Account Energy Pricing Energy Savings

- Renewable Energy Options
 - Clean Wind
 Who's Enrolled
 Generate Your Own
 Power
 Environmental Initiatives
 at PGE

Green Power Calculator Products & Services Energy Classes Outages

Construction

PGE offers medium to very large companies and organizations an easy, affordable way to support renewable energy and publicize your commitment to the environment. We are working with Green Mountain Energy Company — the nation's leading renewable energy provider — to offer you Clean Wind.

Here's how it works: There are significant publicity and advertising benefits you receive with increased participation in the program. You decide which support level is right for your organization. The added publicity and advertising benefits are determined by how much renewable power you purchase as a percentage of your total electricity usage. Many companies are choosing to purchase at the highest level — 100 percent Clean Wind.

Depending on your level of support, you receive promotional benefits such as:

- » Inclusion in frequent page-dominant Business Journal and The Oregonian <u>advertisements</u> (PDF)
- > Quarterly listing in PGE's <u>renewable newsletter</u> (PDF) reaching more than 110,000 customers
- Eligibility for participation in Green Community coupon book, reaching more than 100,000 customers

Flexible, easy to budget, inexpensive

Purchasing Clean Wind is easy and affordable. We can invoice you separately from your PGE electricity bill so that you can buy renewable power out of a different budget, such as marketing or public relations.

Clean Wind helps you offset your carbon dioxide emissions

Clean Wind is 100 percent new wind power with the same reliability you depend on from PGE. This carbon-free power comes from wind farms and is endorsed by such groups as the Renewable Northwest Project, Northwest Energy Coalition and Natural Resources Defense Council.

Clean Wind matters to your customers

Clean Wind provides you with a simple way to demonstrate your concern for the environment and commitment to renewable energy. When you sign up for Clean Wind, PGE will provide you with a range of marketing tools, including window decals, Web graphics and a framed certificate or plaque (depending on your level of commitment). With citizens in Oregon signing up for green power in near record numbers (PGE is currently ranked 1st in the entire nation for sales of renewable power), choosing Clean Wind helps demonstrate your organization's support for a sustainable future. See which local businesses have already signed up for Clean Wind.



Discover proven energy-saving strategles for your business. Learn more.



Discover the benefits of green business practices at GreenPowerOregon.com

Help build a brighter tomorrow, sign up for Clean Wind today

Your organization has the power to make a difference. Sign up for Clean Wind by contacting your PGE representative, calling 866-765-3342 or via email.

Choose where your money goes

You are already being charged a 3 percent public purpose charge as mandated by law (Senate Bill 1149). If you use >1 MWa at any single site during the year, you have the ability to "self-direct" 17.1 percent of this charge to renewable power. Visit our online tutorial to learn how to qualify for self-direction and get your locations approved.

If you do nothing, this portion goes directly to the Energy Trust of Oregon and they will manage your funds. By self-directing your portion to purchase Clean Wind, your firm is deciding to support the type of renewable power that is important to you and your company will receive public recognition for your commitment to the environment.

If you are unsure if your usage falls in this >1MWa eligibility category, please ask your PGE customer manager.

Green Power Partnership

Some medium to large business Clean Wind customers subscribers qualify for the Environmental Protection Agency's <u>Green Power</u> Partnership Program.

The Green Power Partnership is a voluntary program. It encourages organizations to buy renewable energy to reduce the environmental impacts associated with purchased electricity use.

Green Power Partners must meet EPA standards of supplying a percentage of their total energy use with green energy. PGE's Clean Wind program has 12 Green Power Partners; including four at 100 percent of their energy purchases coming from Clean Wind.

Green Power Partners benefit from the use of green power and support the development of new, renewable energy in the United States.

Other Green Power Partnership benefits include:

- > National recognition as an environmental leader
- > Positive attention in our local community
- > Differentiation of organizations and brands from the competition
- Increased organizational competitiveness through sustainable management practices.

If you're interested in becoming an EPA Green Power Partner, please contact your Key Customer Manager.

You will not have electricity from a specific generation facility delivered directly to your organization, but your electricity consumption will be replaced in the Northwest power grid on an annual basis by 100 percent new wind power.

You do not need to purchase this product to continue to receive safe, reliable power from PGE. You may buy similar products and services from other providers.

Additional information about renewable energy certificates

When a renewable energy facility operates, it creates electricity that is delivered into a vast network of transmission wires, often referred to as "the grid." The grid is segmented into regional power pools; in many cases these pools are not interconnected. To help facilitate the

sale of renewable electricity nationally, a system was established that separates renewable electricity generation into two parts: the electricity or electrical energy produced by a renewable generator and the renewable "attributes" of that generation. The renewable attributes or "green" attributes are sold separately as renewable energy certificates (RECs). Only one certificate may be issued for each unit of renewable electricity produced. The electricity that was split from the REC is no longer considered "renewable" and cannot be counted as renewable or zero-emissions by whoever buys it.

This product is comprised of RECs. With the purchase of RECs, you are buying the renewable attributes (i.e. environmental benefits) of a specific amount and type of renewable energy generation. You will continue to receive a separate electricity bill from PGE. Your purchase of renewable certificates helps offset conventional electricity generation in the region where the renewable generator is located. Your purchase also helps build a market for renewable electricity and may have other local and global environmental benefits such as reduced global climate change and regional air pollution.

The renewable certificates in this product are verified and certified by Green-e Energy. Each supplier of renewable certificates is required to disclose the quantity, type and geographic source of each certificate. Please see the Product Content Label (PDF) for this information. Green-e Energy also verifies that the renewable certificates are not sold more than once or claimed by more than one party. For information on Green-e Energy please visit their website www.green-e.org, or call them toll-free, 1-888-63-GREEN.

Contact Us Careers Site Map Privacy Legal Notices En Español Reach us by e-mail, phone or visit our offices .



WE'D LIKE TO THANK THE FOLLOWING.

Or rather, the leading.

PLATINUM

Burgerville
City of Beaverton

City of Milwaukie
Dave's Killer Bread
EasyStreet Online Services

Organically Grown Company
Portland Timbers
Wieden + Kennedy

Tualatin Hills
Parks & Recreation

GOLD

A to Z Wineworks, LLC Ajinomoto

Alpha and Omega Semiconductor

BrucePac

City of Gresham

City of Hillsboro

City of Salem

City of Wilsonville

Elephants Delicatessen

Epson Portland, Inc.

ESCO

EVRAZ

Food Front Cooperative Grocery

Intel Genentech

Kaiser Permanente

Lamb's Markets

Legacy Good Samaritan Hospital

Legacy Meridian Park Hospital

Legacy Mount Hood Medical Center

Linde Group

Leupold & Stevens

Metro

Multnomah County
National College of Natural

Medicine

New Seasons Market

NORPAC Foods, Inc.
OHSU

OMSI

ON Semiconductor

Oregon Siltronic

Portland Streetcar

Precision Castparts

Providence Portland Medical Center

Providence St. Vincent Medical Center

Providence Willamette Falls

Medical Center

Sanyo Solar

Staples, Inc.

Stimson Lumber

Tektronix

The Standard

Tokyo Electron (TEL)

TriQuint Semiconductor

Tuality Healthcare

U.S. Bank National Association

VA Medical Hospital

Vestas Portland HQ, LLC

ViaWest, Inc.

Willamette University

Xerox

Yahoo!

SILVER

-

American Honda Motor Co, Inc.

Cafe Yumm!

College Housing Northwest

Computer Forms, Inc.

Deschutes Brewery

Green Zebra Grocery
Our Lady of the Lake
Shorenstein Realty Services

Grand Central Baking Company

Stacy and Witbeck, Inc.

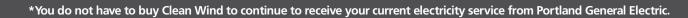
Suburban Door Company

The Ecotrust Building

The Yeon Building

Torpet, LLC
Toyota Motor Sales USA, Inc.
University of Portland
World Foods

Yet more thriving businesses are choosing Clean WindSM power from PGE. Proving once more that doing good and doing well aren't mutually exclusive. Join them and their loyal customers at PortlandGeneral.com/CleanWind or 503-464-2035.





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