



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

April 28, 2021

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 1422 PGE's Application for Waiver of OAR 860-038-0640

Enclosed for filing is Portland General Electric Company's Application for Waiver of Oregon Administrative Rule (OAR) 860-038-0640 Compliance Filing requirement due date of June 1. PGE is requesting a waiver of the June 1 report and requests an extension to complete the verified report to September 1, 2021.

Please direct any questions or comments regarding this filing to Mary Widman at (503) 464-8223. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Waiver of OAR 860-038-0640,
Compliance Filing Requirements for 2021.

**APPLICATION OF PORTLAND
GENERAL ELECTRIC COMPANY**

Pursuant to OAR 860-038-0001(4), Portland General Electric Company (PGE or Company) hereby requests that the Commission waive the compliance requirement due date of June 1 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 860-038-0620. The rule directs the electric company to file the verified report.

860-038-0640

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

A. Discussion

PGE has repeatedly shown that it complies with the Code of Conduct rules as demonstrated by external third-party reviews in the calendar years of 2003, 2005, 2007, and 2011. OPUC verified approvals for internal reviews were conducted by PGE's Internal Audit Service in years 2017 and 2019. Due to culture of compliance and ongoing Division 38 training in even numbered years, PGE received waivers in 2009, 2013, and 2015.

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. After an extensive amount of time conducting interviews, PGE has retained an independent third-party firm to conduct the verified report. Due to these delays, PGE is requesting a waiver of the June 1 report and requests an extension to complete the verified report to September 1, 2021.

B. Conclusion

For all the reasons described above, the Company requests that Commission approve the request for waiver from the June 1 requirements of OAR 860-038-0640 as described herein and allow for an extension of September 1.

DATED this 28th day of April, 2021.

/s/ Donald Light

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