



Portland General Electric Company
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Erin Apperson
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February 14, 2024

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1728 – PGE’s Update to Schedule 201 Qualifying Facility Information

Attention Filing Center:

Enclosed for filing is Portland General Electric Company’s application for waiver of OAR 860-029-0040(4)(a) in the above-referenced docket.

Thank you in advance for your assistance.

Sincerely,

\s\ Erin E. Apperson

Erin E. Apperson
Assistant General Counsel III

EEA/bp

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1728

In the Matter of,

PORTLAND GENERAL ELECTRIC
COMPANY,

Update to Schedule 201 Qualifying Facility
Information.

PORTLAND GENERAL ELECTRIC
COMPANY'S APPLICATION FOR
WAIVER OF OAR 860-029-0040(4)(a)

Portland General Electric Company (PGE) respectfully requests that the Public Utility Commission of Oregon (Commission) waive the requirement contained in OAR 860-029-0040(4)(a) to file its standard rates for qualifying facilities within 30 days of Commission acknowledgment of its integrated resource plan (IRP). Due to the time needed to comply with the Commission's decision to adopt Staff's recommendation regarding updating assumptions for qualifying facilities (QFs), PGE respectfully requests an extension of this 30-day filing requirement with a new deadline of March 15, 2024. This request is made Pursuant to OAR 860-029-0005(3) which allows the Commission to provide relief from the Division 29 rules for good cause shown.

I. Support for Request

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 IRP. On January 25, 2024, the Commission acknowledged PGE's IRP subject to certain conditions. The Commission adopted Staff's condition directing PGE to recalculate its IRP inputs using an assumption of 75

percent for QF renewals and the success rate for Schedule 202 projects.¹

Compliance with this condition requires PGE's IRP analysts to perform new analysis to reassess capacity contribution for multiple resource profiles under modified portfolio conditions. PGE has been diligently working on this compliance filing but is concerned about its ability to complete this filing successfully and accurately within the required 30-day timeframe. PGE had anticipated being able to complete this work within the required timeframe, but due to staffing limitations on the IRP team, PGE is now finds that additional review will be necessary to confirm that results are accurate. PGE respectfully requests that the Commission consider and approve this request at the February 20, 2024 public meeting given the upcoming deadline.

PGE does not currently have any QF projects in its queue and therefore, it is PGE's understanding that this three-week delay should not impact any potential QFs.

PGE has conferred with Commission Staff, who have stated no objection to this request. On February 14, 2024, PGE also conferred with the Renewable Energy Coalition (REC), the Community Renewable Energy Association (CREA), and NewSun Energy. REC stated that it does not yet have a position. At the time of this filing, PGE had not yet received a response from CREA or NewSun Energy regarding their positions.

¹ LC 80, Staff Report at 25.

II. Conclusion

For the reasons discussed above, good cause exists to waive the requirement for filing.

PGE respectfully requests that the Commission approve this waiver and extension request.

DATED this 14th day of February, 2024.

Respectfully Submitted,

\s\ Erin E. Apperson

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