



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

November 16, 2015

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

**RE: Advice No. 15-28, Schedule 77 Firm Load Reduction Pilot Program Update
and Schedule 128 Short Term Transition Adjustment Update**

Portland General Electric (PGE) submits this filing pursuant to Oregon Revised Statutes (ORS) 757.205 and 757.210 and Oregon Administrative Rule (OAR) 860-022-0025 for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **January 1, 2016**:

Tenth Revision of Sheet No. 77-3
Seventeenth Revision of Sheet No. 128-1
Sixteenth Revision of Sheet No. 128-2
Twenty Third Revision of Sheet No. 128-4

As specified in Schedule 77, this filing updates the reference-fuel costs for 2016. The updated prices are based on gas prices from the November 16, 2015 Power Cost Update in PGE's General Rate Case Docket No. UE 294. A work paper is attached and is proprietary and confidential and should be treated as confidential submission under OAR 860-001-0070. The work paper is provided in a separate sealed envelope marked "Confidential."

Also, this filing establishes the 2016 transition adjustment rates under Schedule 128 for customers electing to leave Cost of Service or choose Direct Access Service as of January 1, 2016. The Schedule 128 Short Term Transition Adjustment incorporates the final UE 294 Monet Net Variable Power Cost analysis consistent with the approved stipulations in UE 294.

Schedule 128 Short Term Transition Adjustment prices for each schedule are calculated based on the difference between the prospective 2016 Energy Charges effective January 1, 2016 and the 2016 forward market prices for power. These Schedule 128 Transition Adjustments will be updated to reflect the costs of the Carty generating station when it becomes operational in 2016.

The election window will open on November 16, 2015 at 2:00 PM and will close at 5:00 p.m. on November 23, 2015. This filing is made concurrently with the posting of the transition adjustment rates on the Company's website www.PortlandGeneral.com/business. The work papers supporting the Schedule 128 Short-Term adjustment rates are included.

To satisfy the requirements of OARs 860-022-0025(2) and 860-022-0030(1), PGE provides the following responses:

OARs 860-022-0025 and 860-022-0030 require that PGE submit a statement of the tariff schedule change, the number of customers affected, the change in revenue, and the grounds supporting the change. With regard to identifying the number of customers affected and change in revenue, Schedule 128 is for Customers electing to leave PGE's Cost of Service or choose Direct Access as of January 1, 2016. It is unknown how many customers will make this election and the revenue change is therefore unknown. Schedules 77 and 128 cannot be estimated because both are optional schedules.

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

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

Sincerely,



Karla Wenzel
Manager, Pricing and Tariffs

Enclosures

SCHEDULE 77 (Continued)

RESERVATION AND FIRM ENERGY PAYMENTS

The Customer receives a Reservation and Firm Energy payment as follows:

Reservation payment is the Customer commitment (per kW) multiplied by the applicable Reservation payment (per \$/kW) based on the Option selected by the Customer. The Reservation payment is made to the Customer no later than 60 days after the month in which they participated. If reductions are called during the applicable month, a Customer must fulfill all reductions prior to receiving the Reservation payment.

The Energy Payment is the Firm Energy Reduction Amount times the lesser of the hourly Mid-Columbia Electricity Index (Mid-C) as reported by the Powerdex or fuel cost per MWh for a Simple Cycle Combustion Turbine (SCCT) during the Load Reduction Event as shown below, adjusted for losses based on the Customer's delivery voltage. The Firm Energy Reduction Amount can be up to 120% of the commitment.

For the 2016 calendar year, the reference fuel costs per MWh for a SCCT are:

Jan 2016	Feb 2016	Jul 2016	Aug 2016	Sep 2016	Dec 2016
\$20.18	\$20.24	\$18.25	\$18.71	\$18.52	\$24.44

(C)

(C)

(R)

The Firm Energy Reduction Payment rates will be updated annually by December 1st for the next calendar year. Evaluation and settlement of the Firm Energy Reduction Payment will occur within 60 days of the Firm Load Reduction Event.

*Holidays are New Year's Day (January 1), President's Day (February), Memorial Day (last Monday in May), Independence Day (July 4), Labor Day (first Monday in September), Thanksgiving Day (fourth Thursday in November), and Christmas Day (December 25). If a holiday falls on Saturday, Friday is designated a holiday. If a holiday falls on Sunday, the following Monday is designated a holiday.

**SCHEDULE 128
SHORT-TERM TRANSITION ADJUSTMENT**

PURPOSE

The purpose of this Schedule is to calculate the Short-Term Transition Adjustment to reflect the results of the ongoing valuation under OAR 860-038-0140.

AVAILABLE

In all territory served by the Company.

APPLICABLE

To all Nonresidential Customers served who receive service at Daily pricing (other than Cost of Service) on Schedules 32, 38, 75, 83, 85, 89, 90, 91 or 95 or Direct Access service on Schedules 515, 532, 538, 549, 575, 583, 585, 589, 590, 591, 592 and 595. This Schedule is not applicable to Customers served on Schedules 485, 489, 490, 491, 492 and 495.

SHORT-TERM TRANSITION ADJUSTMENT

The Short-Term Transition Adjustment will reflect the difference between the Energy Charge(s) under the Cost of Service Option including Schedule 125 and the market price of power for the period of the adjustment applied to the load shape of the applicable schedule.

ANNUAL SHORT-TERM TRANSITION ADJUSTMENT RATE

For Customers who have made a service election other than Cost of Service in 2015, the Annual Short-Term Transition Adjustment Rate will be applied to their bills for service effective on and after January 1, 2016: (C)

Schedule		Annual ¢ per kWh ⁽¹⁾
32		3.399
38		2.920
75	Secondary	3.001 ⁽²⁾
	Primary	2.944 ⁽²⁾
	Subtransmission	2.974 ⁽²⁾
83		3.313
85	Secondary	3.164
	Primary	3.075

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(I)

(1) Not applicable to Customers served on Cost of Service.
(2) Applicable only to the Baseline and Scheduled Maintenance Energy.

SCHEDULE 128 (Continued)

ANNUAL SHORT-TERM TRANSITION ADJUSTMENT RATE (Continued)

Schedule		Annual ¢ per kWh ⁽¹⁾	
89	Secondary	3.001	(I)
	Primary	2.944	
	Subtransmission	2.974	
90		2.594	
91		2.741	
95		2.741	
515		2.741	
532		3.399	
538		2.920	
549		4.413	
575	Secondary	3.001 ⁽²⁾	
	Primary	2.944 ⁽²⁾	
	Subtransmission	2.974 ⁽²⁾	
583		3.313	
585	Secondary	3.164	
	Primary	3.075	
589	Secondary	3.001	
	Primary	2.944	
	Subtransmission	2.974	
591		2.741	
590		2.594	
592		2.716	
595		2.741	

(1) Not applicable to Customers served on Cost of Service.

(2) Applicable only to the Baseline and Scheduled Maintenance Energy.

ANNUAL SHORT-TERM TRANSITION ADJUSTMENT REVISIONS

The Annual Short-Term Transition Adjustment rate will be filed on November 15th (or the next business day if the 15th is a weekend or holiday) to be effective for service on and after January 1st of the next year. Indicative, non-binding estimates for the Annual Short-Term Transition Adjustment and Cost-of-Service Energy Prices will be posted by the Company by September 1 and then again one week prior to the filing date. These prices will be for informational purposes only and are not to be considered the adjustment rates.

SCHEDULE 128 (Concluded)

Second Quarter – April 1st Balance of Year Adjustment Rate ⁽¹⁾

Schedule		Annual ¢ per kWh ⁽²⁾
38		0.000
75	Secondary	0.000 ⁽³⁾
	Primary	0.000 ⁽³⁾
	Subtransmission	0.000 ⁽³⁾
83		0.000
85	Secondary	0.000
	Primary	0.000
89	Secondary	0.000
	Primary	0.000
	Subtransmission	0.000
90		0.000
91		0.000
95		0.000
538		0.000
575	Secondary	0.000 ⁽³⁾
	Primary	0.000 ⁽³⁾
	Subtransmission	0.000 ⁽³⁾
583		0.000
585	Secondary	0.000
	Primary	0.000
589	Secondary	0.000
	Primary	0.000
	Subtransmission	0.000
590		0.000
591		0.000
592		0.000
595		0.000

(C)

(C)

(C)

(1) Applicable April 1, 2016 through December 31, 2016.
(2) Not applicable to Customers served on Cost of Service.
(3) Applicable only to the Baseline and Scheduled Maintenance Energy.