



Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

April 23, 2020

Via Electronic Filing

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

**Re: UM 1938 Application for Reauthorization of the Deferral of Costs and Revenues
Associated with Transportation Electrification Pilots**

Dear Filing Center:

Pursuant to ORS 757.259, and OAR 860-027-0300, enclosed for filing is the Application of Portland General Electric Company ("PGE") for Reauthorization of the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots. PGE's original deferral application for the period April 23, 2018 through April 22, 2019, and the reauthorization for the period April 23, 2019 through April 22, 2020, is awaiting Commission approval.

A Notice of Application regarding the filing of this application is attached. We have provided notification to the UM 1938 and UE 335 service lists. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

If you have any questions or require further information, please call me at (503) 464-7805 or Alex Tooman at (503) 464-7623.

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

JF/np
Enclosure
cc: UM 1938 and UE 335 Service Lists

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1938

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots

Application for Reauthorization of the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (“PGE”) hereby respectfully requests authorization to continue to defer the costs and revenues associated with the Transportation Electrification Pilots (“TE Pilots” or “Pilots”) approved by Public Utility Commission of Oregon (“Commission” or “OPUC”) Order No. 18-054 and later modified by Order No. 19-385 (Docket No. UM 1811). These Pilots are aimed at advancing state policy to accelerate transportation electrification in Oregon. We request this reauthorization to be effective as of April 23, 2020.

I. Deferral History

In alignment with the State of Oregon’s policy direction of electrification, PGE is pursuing efforts as a company to decarbonize its energy supply, increase electricity as a share of total energy use, and enhance operational performance and efficiency. PGE’s TE Pilots not only comply with Oregon’s policy direction, but also support PGE’s decarbonization, electrification, and performance imperatives.

PGE filed its initial request for the deferral on April 23, 2018. That application proposed that the deferral support an automatic adjustment clause (AAC) rate schedule for the Pilots’ 10-year period. On April 23, 2019, PGE filed for reauthorization of the deferral. On February 21, 2020,

PGE filed a supplemental application¹, which proposed to modify the initial deferral application to no longer support an AAC and to no longer seek the deferral or tracking in of capital costs associated with the TE Pilots. PGE is currently awaiting Commission action on all of its UM 1938 applications and its request to defer incremental costs associated with the TE Pilots for later ratemaking treatment. Thus, we have an unresolved initial deferral application and are now at the second 12-month deadline, prompting this reauthorization filing.

In accordance with Commission Order No. 18-054 and OAR 860-087-0030, PGE has launched three Pilots: Electric Avenue (10 years), TriMet Mass Transit (10 years), and Education and Outreach (3 years) and will incur incremental costs, including cost related to evaluations, for the Pilots. The details of the Pilots are discussed in PGE's supplemental application for transportation electrification programs filed March 15, 2017 (Docket No. UM 1811) and are summarized as follows:

- Electric Avenue Pilot (including procurement, software, engineering studies, outreach, maintenance and payment process expenses);
- Support of Tri-Met Mass Transit (including procurement, management and maintenance expenses);
- Education and Outreach pilot expenses (including specialized trainings, builders and developer outreach, ride and drive events, and regional market transformation activities); and
- Pilot Evaluation costs.

During 2018, PGE began implementing the Pilots as described in Attachment A. Planned activities for the Pilots are also discussed in Attachment A.

¹ <https://edocs.puc.state.or.us/efdocs/HAQ/um1938haq164227.pdf>

II. OAR 860-027-0300 Requirements

The following is provided pursuant to OAR 860-027-0300:

a. Description of Amounts

PGE proposes that the deferral continue for 10 years and is capped at a maximum allowable cost of \$3.8 million as approved by Commission Order No. 19-385, and listed in Table 1, below.

Table 1
Maximum Allowable Costs (\$000)

Pilot	Amount
TriMet Electric Mass Transit Pilot	\$0
Education and Outreach Pilot	\$480
Electric Avenue Pilot	\$2,787
Evaluations	\$580
Total	\$3,847

b. Reasons for Deferral

See Deferral History. The granting of this Application will minimize the frequency of rate changes and/or match appropriately the costs borne by and benefits received by customers. As PGE presented in the UM 1811 Transportation Electrification workshops, approval of a cost-recovery mechanism is necessary to proceed with the Pilots because the costs are not included in customer prices or any other recovery mechanism. PGE expects the deferred amount to be recovered or refunded in a manner approved by the Commission.

c. Proposed Accounting for Recording Amounts Deferred.

PGE proposes to record the deferred amount as a regulatory asset in FERC account 182.3, Other Regulatory Assets, with a credit to FERC account 456, Other Revenue.

d. Estimate of Amounts to be Recorded for the Next 12 months.

PGE estimates the net costs of the Pilots to be approximately \$0.4 million for the next 12 months and are included in the calendar year forecasts as presented in Table 2, below.

Table 2
Forecasted Pilot Costs

Pilot	2020 Forecast	2021 Forecast	Estimated Totals
Electric Avenue	\$67,330	\$41,784	\$109,114
TriMet ²	\$0	\$0	\$0
Education and Outreach	\$355,512	\$0	\$355,512
Evaluation	\$147,154	\$88,282	\$235,436
Totals	\$569,996	\$130,066	\$700,062

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with Notice are attached to the application as Attachment B. In compliance with the provisions of 860-027-0300(6), PGE is serving Notice of Application on PGE’s most recent General Rate Case (OPUC Docket No. UE 335) service list.

III. Summary of Filing Conditions.

a. Earnings Review

PGE proposes that cost recovery associated with the Pilots will be subject to an earnings review in accordance with ORS 757.259(5).

b. Prudence Review

PGE will submit Pilot evaluation reports that will provide detailed cost summaries. A prudence review can also be performed during the Pilot’s operations.

c. Sharing

All prudently incurred costs and benefits would be collected or refunded from or to customers with no sharing mechanism.

² Net costs for TriMet equal zero.

d. Rate Spread/Rate Design

Costs will be allocated using the applicable rate schedule's forecasted energy based on an equal percent of revenues applied on a cents per kWh basis to each applicable rate schedule.

e. Three percent test (ORS 757.259(6))

The amortization of the Pilot's deferred costs will be subject to the three percent test in accordance with the ORS 757.259(7) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

IV. PGE Contacts

The authorized addresses to receive notices and communications in respect to this Application are:

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In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Jaki Ferchland, Manager Revenue Requirement
E-mail: jacquelyn.ferchland@pgn.com

V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the costs and revenues associated with the Pilots.

DATED this April 23, 2020.

Respectfully Submitted,

/s/ Jaki Ferchland

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UM 1938

Attachment A

**Electric Avenue,
Trimet Mass Transit Pilots,
and
Education and Outreach
Detail**

Electric Avenue

Electric Avenue Network Expansion 2019 Activity

In 2019, Portland General Electric Company's (PGE's) Customer Energy Solutions (CES) department worked in the following key areas regarding Electric Avenue: site acquisition, site design and development, and operations and maintenance.

Site Acquisition

Site acquisition continued from 2018 with the team working with PGE's Geospatial Information Services (GIS) department to determine where there are higher concentrations of electric vehicles (EVs) and to model the expected growth in EV ownership in the coming years. Data sources included existing Direct Current Quick Chargers (DCQC), Oregon Census Blocks, existing EVs in our service territory, personas created by PGE's Customer Insights department, and projected traffic volumes in the year 2025. Through data processing and analysis, we can visualize where there will be the greatest demand for new EV charging stations now and in the future.

Equipped with the information from the GIS process and analysis, the team then began identifying areas of interest. Working closely with PGE's Local Government Affairs department and PGE's Key Customer Management department, the team conversed with several entities to gauge interest in being a site host for an Electric Avenue. In parallel with the site host engagement process, the team made field visits to sites of interest to analyze how each site met the siting criteria of visibility, accessibility, amenities, proximity to the distribution grid and proximity to underserved communities. These field visits allowed the team to identify prime locations for development and pursue the execution of site host agreements. In 2018, three of the six sites were acquired with fully executed agreements: Milwaukie (10834 SE McLoughlin Blvd, Milwaukie, OR 97222), Hillsboro (2295 SE Tualatin Valley Highway, Hillsboro, OR 97123), and East Portland (next to 4124 SE 82nd Ave, Portland, OR 97266).

PGE continued site acquisition activities in 2019 with the addition of locations in Wilsonville (8200 SW Wilsonville Rd, Wilsonville, OR 97070), Beaverton (corner of SW Broadway St. and SW Canyon Rd, Beaverton, OR 97005), and Salem (900 Court St. NE, Salem, OR 97301). All site acquisition work for the Electric Avenue Network concluded in 2019.

Site Design and Development

The team decided to pursue site design and development through the design-bid-build approach. Partnering with a local engineering firm to manage the site design process, the team held several site visits, meetings and consultative sessions with the site host to finalize the site designs for site one, located in Milwaukie, and site two, located in Hillsboro. Upon finalized designs for the two sites, a formal construction RFP process was held for both locations, including a site walk, before the construction contracts were awarded. Site one, located in downtown Milwaukie, began development in November 2018 while plans for the Hillsboro location were finalized.

Construction of the Milwaukie location was completed in early Q1 and a grand opening event was held on April 6, 2019. Construction of the Hillsboro location began in February 2019 opened to the public on May 18th. For locations four through six, PGE switched their design and development procurement strategy to a design – build approach. PGE's Supply Chain team

collected complete bids through an RFP process and a design – build contract was awarded.

Throughout Q3 and Q4 of 2019, PGE constructed Wilsonville, Beaverton, and Salem locations, further detailed in the table below. Start of construction represents the date at which construction crews were first mobilized to the site. The date of commissioning represents that date at which the stations were first energized and configured by the manufacturer and the opening date represents the beginning of revenue collection activities.

Location	Construction Started	Commissioned	Opened to Public
Milwaukie	November 2018	February 2019	April 2019
Hillsboro	February 2019	April 2019	May 2019
East Portland	July 2019	September 2019	October 2019
Salem	December 2019	January 2020	January 2020
Wilsonville	August 2019	January 2020	February 2020
Beaverton	September 2019	February 2020	April 2020 (pending)

Operations and Maintenance

PGE placed an equipment order for locations four and five in early 2019 through the vendors selected in 2018. PGE entered into operations and maintenance contracts with the hardware provider, BTC Power, to conduct routine annual maintenance and emergency repairs. PGE’s internal operations and maintenance staff also began conducting remote monitoring and periodic on-site inspections.

PGE expects internal operations and maintenance resources to continue conducting remote monitoring and periodic on-site inspections in coordination with a third-party vendor for routine maintenance and emergency repairs.

Use of the three new Electric Avenue sites in 2019 has been steady. Approximately 50 percent of charging sessions at these sites are initiated by drivers who have purchased a monthly subscription. Of these sessions, we know that at least half were initiated by drivers who drive for a transportation network company. Drivers have reported some frustration with the network provider’s mobile app.

Electric Avenue Network 2020 Activity

Site Design and Development

PGE completed all remaining site commissioning activities in Q1 and opened all locations to the public except for Beaverton. All commissioning activity was completed at Beaverton in Q1 and PGE will complete minor parking lot reconfiguration and repaving activities in early Q2 with the site open to the public shortly thereafter.

Operations and Maintenance

In an effort to address the frustrations reported by drivers, a new version of the mobile app was released in March 2020, and initial reports are positive. Some drivers have also expressed concern about temporary credit card authorization holds issued by the network providers payment processor. The new mobile app has temporarily removed this necessity, although it may return.

PGE does not have current estimates for how the COVID-19 pandemic and state-wide stay

at home order will impact site utilization and revenue. Early indications are that monthly subscription numbers will decrease in the near term.

Education and Outreach

Electric Avenue grand openings are an opportunity to raise awareness of the new charging infrastructure within the local communities, which we leverage to increase awareness in our service territory through various communication channels. These opening events will focus on creating awareness through earned and owned media. Where possible we will partner with cities as part of larger sustainable transportation initiatives and events. Strategically we will focus our outreach and education efforts on residents who currently drive electric vehicles, will likely consider purchasing electric vehicles and current Transportation Network Companies (TNC) (e.g. Lyft or Uber) EV drivers with the goal of increasing Electric Avenue awareness and utilization.

TriMet Mass Transit Pilots

In 2018, OPUC approved a pilot with TriMet whereby PGE owns, operates, and maintains high-powered charging infrastructure to power TriMet's first all-electric bus line. Throughout 2018, PGE worked closely with TriMet to design, install, commission, and operate the proposed electric bus charging infrastructure. PGE provided guidance on the most flexible and cost-effective methods to connect the charging infrastructure at Sunset Transit Center and Merlo Garage to PGE's distribution grid, provided insight into site layout and construction, and held regular meetings with TriMet and other construction contractors.

TriMet Mass Transit 2.0 2019 Activity

PGE put into service 3-150kW charging stations and 1-450kW charging stations to serve 6 all-electric buses. PGE created an Electric Bus Charging Infrastructure operations and maintenance program in collaboration with TriMet and the infrastructure supplier. PGE continues to provide technical support, project management, and operations and maintenance services.

Technical Support and Project Management

PGE's CES and Operations and Maintenance teams continued to provide technical support and O&M services of the charging equipment during site construction and commissioning of Sunset Transit Center and Merlo Garage. Construction of charging infrastructure was completed by early to mid-2019 at both locations.

Operations and Maintenance Program Development

PGE completed contract negotiations with ABB and New Flyer on the purchase of charging equipment, service requirements, and spare parts for repairs. After the equipment was commissioned and meets PGE's acceptance criteria, PGE will take full ownership of the charging infrastructure and formally begin providing operations and maintenance services. This is expected to happen in Q2 2020, pending final commissioning of the sequential charging capability of the depot chargers.

TriMet Mass Transit 2.0 2020 Expected Activity

PGE anticipates focusing on infrastructure operations and maintenance at the Merlo Garage and Sunset Transit Center in 2020—ensuring high uptime for the customer. Though we anticipate COVID to impact ridership of TriMet's bus lines, we will continue to service the equipment so

they can continue to operate these buses.

Operations and Maintenance

PGE expects internal operations and maintenance resources to continue conducting remote monitoring and periodic inspections in coordination with a third-party vendor for routine maintenance and emergency repairs.

Education and Outreach Detail

PGE has focused its Education and Outreach in two areas Market Transformation and Technical Assistance/Commercial Outreach. Market Transformation is aimed at redefining electric fuel for our customers and the vehicle sales community. Technical Assistance/Commercial Outreach is aimed at supporting business customers with tools they need to invest in EVs for their fleet of charging infrastructure for their employees/patrons.

Market Transformation 2019 Activity

Chargeway

PGE's CES team worked with Chargeway to deploy Chargeway Beacons in local auto dealerships. Chargeway utilizes a simple number and color system to explain charging capabilities of all EV's available in the marketplace. The effort initiated in October 2018 and covers deployment of three Chargeway Beacons in EV auto dealerships throughout PGE's service territory. We placed our first Chargeway Beacon at Wilsonville Chevrolet in November 2018. We trained the staff on the features and benefits of the Chargeway Beacon and platform. In addition to Beacon placement, we labeled our Electric Avenue infrastructure using the Chargeway nomenclature. PGE is the first utility nationally to partner with Chargeway.

Portland International Auto Show

PGE partnered with Forth, PacifiCorp, Clark PUD, and Chargeway to sponsor the Electric Avenue EV display at the 2019 Portland International Auto Show January 24-27th. Electric Avenue's goal is to bring together regional partners to promote EVs, and EV charging to likely car buyers. In addition to EV's and EV charging, we also had several Chargeway Beacons on display at the auto show to help familiarize attendees with electric fuel, and how the Chargeway platform can make it easier to drive an EV.

Roadmap Conference

Roadmap is the nation's largest EV conference and is hosted each year by Forth. PGE sponsored this event, and recognizes its value in bringing together, utilities, policy makers, nonprofits, government and auto manufacturers to discuss issues related to the mass adoption and deployment of EVs, and its supporting infrastructure.

Transportation Network Company Promotion

PGE partnered with Forth, Lyft and Uber to host an information session in November of 2019 to learn about EV driving benefits, special EV financing available, as well as a ride and drive. Both Uber and Lyft have developed platforms which enable users to select a "Green Option" when

requesting a ride on the app. PGE recognizes this as an opportunity to get more riders in EVs, with the intent of educating and addressing myths about EVs. Current TNC EV drivers have been advocates and ambassadors of EV conversion, and PGE has worked with the TNC's to engage their current and prospective EV drivers about the programs and benefits of driving electric. This engagement has come in the form of focus groups, with both current and interested EV drivers, as well as information sessions targeting potential EV drivers. Key Findings from the event included:

- Majority of attendees were most interested in test driving an EV
- Majority of attendees reported high satisfaction with ride and drive, and as a result of attendance their desire to purchase an EV had increased
- Nearly half of attendees reported that their awareness of PGE's Electric Avenues was influential in their consideration of EV's

Market Transformation 2020 Expected Activity

Portland International Auto Show

PGE partnered with Forth, PacifiCorp, Clark PUD, and Chargeway to sponsor the Electric Avenue EV display at the 2020 Portland International Auto Show February 20-23rd. This year's Electric Avenue featured three EV's, a vehicle wall display, an information booth, Chargeway Beacons, Information Towers, and various examples of public charging infrastructure, both level 2 charging infrastructure (approximately 7-kW) and DC Quick Charging (approximately 50-kW). The booth was staffed with volunteers from PGE, PacificCorp, Forth and Clark PUD. This year's electric avenue also included an EV ride and drive, which was a first for the event. There were 196 rides over the course of the auto show.

EV Symposium (EVS) 33

The 33rd edition of EVS will bring together policy makers, industry experts and academics to explore and dissect the latest innovations in transportation electrification at the Oregon Convention Center in Portland, OR June 14-17th. PGE recognizes its value in bringing together, utilities, nonprofits, government and auto manufacturers to discuss issues related to the mass adoption and deployment of EVs, and its supporting infrastructure. PGE will also sponsor Public Day, a family-friendly day-long event where attendees can test drive some of the latest EVs, including cars, trucks, bikes and scooters. Our participation in EVS 33 will be adjusted as needed based on developments related to the COVID-19 pandemic crisis.

Chargeway

PGE is working with Chargeway to expand deployment of the Chargeway beacons to an additional three local EV dealerships. Currently beacons are placed at Wentworth's Wilsonville Chevrolet, Kuni BMW & Platt Auto. The response has overall been positive to the placement and utilization of the Chargeway Beacon. Wilsonville Chevrolet has reported a significant increase in the number of EV's they have been able to sell with the aid of the Chargeway platform.

We will look to place the new Beacons at geographically diverse locations as well as having them placed at stores/OEM's throughout the range of available vehicles from premium to affordable.

Technical Assistance/Commercial Outreach 2019 Activity

Technical assistance includes customer classes, webinars, and one-on-one customer consultations.

In 2019 we supported over 50 customers with technical assistance on electric fleets and EV charging options. The focus of these visits was on are municipal (including four transit agencies), fleet, commercial, retail, multifamily, and developer customer groups. Additionally, over 200 customers have participated in nine EV themed workshops

PGE has also worked in collaboration with our local community partners to support the development of standards that include EV-ready design elements in new construction. We will continue to work with the state and municipalities on the development of those standards.

Technical Assistance/Commercial 2020 Expected Activity

In 2020, we anticipate focusing on technical assistance visits and helping customers develop fleet electrification plans. Our hope is that the tool will be helpful for customers in adopting electric fleet vehicles and for our system planners in identifying when and where to expect EV loads. Our activities will be adjusted as needed based on the ongoing COVID-19 pandemic crisis.

Dealer Engagement

PGE is partnering with the Oregon Auto Dealers Association, Chargeway, and local dealerships to develop and launch a dealer EV education and awareness initiative which aims to create consistency and a common language for communicating EV features and benefits, available incentives, as well as utility programs and offerings. We will focus our engagement at those dealerships with a high level of available inventory, as well as those displaying a commitment to the selling EV's.

We will continue our outreach efforts to commercial customers to identify their needs related to EV charging and EV adoption. Our engagement with dealers, and commercial customers will be adjusted as needed based on the ongoing COVID-19 pandemic crisis.

Attachment B

Notice of Application for Reauthorization of the Deferral of Costs and Revenues Associated with the Transportation Electrification Pilots

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1938

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots

Notice of Application for Reauthorization of the Deferral of Costs and Revenues Associated with the Transportation Electrification Pilots

On April 23, 2020, Portland General Electric Company (“PGE”) filed an application with the Public Utility Commission of Oregon (the “Commission”) for an Order reauthorizing deferral of costs and revenues associated with transportation electrification Pilots

Approval for deferred accounting treatment will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Persons who wish to obtain a copy of PGE’s application will be able to access it on the Commission website.

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than May 25, 2020.

Dated this April 23, 2020

/s/ Jaki Ferchland
Jaki Ferchland
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application for the Reauthorization of the Deferral of Costs and Revenues Associated with the Transportation Electrification Pilots** to be served by electronic mail to those parties whose email addresses appear on the attached service list to those parties on the attached service lists for OPUC Dockets UM 1938 and UE 335.

Dated at Portland, Oregon, this 23rd day of April, 2020.

/s/ Jaki Ferchland

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