



**Portland General Electric Company**  
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February 10, 2021

***Via Electronic Filing***

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

Re: UM 1953 PGE Comments in Response to Calpine Objections and Comments

Dear Filing Center:

PGE has reviewed Calpine's today-filed comments and objections to our UM 1953 compliance filing. We write this response to enable the Commission to make a finding of compliance at the public meeting tomorrow, while also allowing the Calpine objections to be heard. PGE's filing at issue regards the remaining capacity in PGE's Phase 1 Green Energy Affinity Rider that is being contracted for by a customer through the Customer Supply Option. According to PGE's Schedule 55, we submit a copy of the customer agreement and calculation of energy and capacity credits to the Commission to ensure that the credits are being made according to the Commission directed methodology. Staff has reviewed the filing and recommends that the Commission find it compliant.

In their comments and objections, Calpine expresses concerns about the time it had to review the filing, and that its issues regarding PGE's classification of the information as confidential could be made moot with a Commission decision on the compliance issue. Regarding the claim of adequate time, after some back and forth with Staff and Calpine following PGE's original January 22 compliance filing, PGE filed work papers amending the confidentiality designation from highly confidential to confidential on Feb 5 so that Calpine's witness would have access and conduct a review.

PGE agrees that Calpine should have the opportunity to be heard on the confidentiality issue and that the proper avenue, according to the specific terms of the Protective Order 18-260, is to challenge the designation of the information as protected with the ALJ. The ALJ will then seek to expeditiously resolve the dispute. Regardless of the Commission decision on the compliance of our filing, PGE agrees to participate in the process and will follow the ALJ determination. If the ALJ determines that the information should not be designated as protected, PGE would then file updated work papers with the Commission. PGE offers this so that the Commission may make a decision on compliance tomorrow at its public meeting, without rendering Calpine's concerns moot.

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We look forward to discussing this further with the Commission tomorrow and being available for any questions.

Sincerely,

*/s/ Karla Wenzel*

Karla Wenzel  
Manager Regulatory Policy and Strategy

cc: UM 1953 Service List