



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

April 8, 2021

*Via Electronic Filing*

Public Utility Commission of Oregon  
P.O. Box 1088  
Salem, OR 97308-1088

Re: UM 1953 Addendum to Compliance Filing for Tranche 1

Dear Filing Center:

This letter presents information that Portland General Electric Company (PGE) designated confidential in its January 22, 2021 compliance filing work papers for the PGE Green Energy Affinity Rider, Customer Supply Option subscription. Following our compliance filing, Calpine Energy Solutions, LLC protested PGE's designation of the energy and capacity credits as confidential. After briefing on the issue, Chief Administrative Law Judge Moser sustained Calpine's objection to PGE's designation, thereby necessitating an update to our compliance filing to make public the capacity and energy credit values.

The basis for Judge Moser's decision is that PGE's contention that providing the values would enable a back calculation of an approximate PPA price (which is highly confidential) is not accurate unless the subscription price were made public. Given that the subscription price associated with this compliance filing, for the customer supply option customer, had not been made public, PGE's claimed harm in releasing the values, was found by ALJ Moser to be "generally speculative" and not meeting the threshold of demonstrating "likelihood of substantial harm." PGE is releasing the energy and capacity credit values for this subscription but notes that if there is a future subscription tranche for which the subscription price has been made public or is likely to be made public, PGE reserves the right to then designate energy and capacity credits as confidential. This could occur, for example, if the subscribers were public entities and the price became a matter of public record and not protected from disclosure. Should this occur, we understand the rights of Parties to challenge such designation under a then-effective protective order.

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Given ALJ Moser's decision regarding PGE's compliance filing submitted January 22, 2021, PGE hereby notes for docket participants the energy credit and capacity credit values as follows:

- \$41.46 per MWh for the energy credit, and
- \$3.54 per MWh for the capacity credit.

Please direct any questions regarding this filing to Karla Wenzel at [karla.wenzel@pgn.com](mailto:karla.wenzel@pgn.com).

Sincerely,

*/s/ Karla Wenzel*

Karla Wenzel  
Manager, Regulatory Policy and Strategy

cc: UM 1953 Service List