



**Portland General Electric**  
121 SW Salmon Street · Portland, Ore. 97204

June 12, 2020

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

**RE: Staff Report for Public Meeting Date June 16, 2020 (Item No. RA4)  
Docket No. UE 358, PGE NLDA Program Administration and Queue Issues**

Portland General Electric Company (PGE) does not oppose Staff's recommendation that the Commission direct PGE to include in our tariff our queue management plan for our New Load Direct Access (NLDA) program. Should the Public Utility Commission of Oregon (Commission) choose to adopt Staff's recommendation at the June 16, 2020, Public Meeting, PGE will then submit the relevant proposed tariff sheets.

Although Staff does not make a recommendation regarding the Commission's waiver process, Staff includes in its analysis Commission considerations for NLDA eligibility waiver requests. Staff notes that the Commission states in Order 18-341 (at 7-8) that the costs or risks to cost-of-service customers of granting such a waiver should be insignificant, while the overall benefit to the system should be significant. In the subsequent discussion of cost-shifting and risk, Staff recalls that resource adequacy (RA) was one of the unidentified and unintended costs of NLDA called out in Order 20-002, stating, "[i]t may be beneficial for waiver requests to address RA in their waiver requests [...]" (Staff Report at 6). PGE welcomes Staff's highlighting the importance of RA, and offers two observations: waivers are usually fact intensive determinations and may not lend themselves to the Commission guidance Staff is suggesting, and secondly, customer RA contribution is in scope for the issues being explored in UM 2024, the Alliance of Western Energy Consumers' (AWEC) Petition for an Investigation into Long-Term Direct Access. As such, PGE does not recommend that eligibility waiver requests should address RA before the conclusion of UM 2024.

PGE looks forward to the outcome of the Public Meeting on June 16, 2020.

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing & Tariffs