



e-FILING REPORT COVER SHEET

COMPANY NAME: Portland General Electric Company

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION?  No  Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

Select report type:  RE (Electric)  RG (Gas)  RW (Water)  RT (Telecommunications)  
 RO (Other, for example, industry safety information)

Did you previously file a similar report?  No  Yes, report docket number: RE-182

Report is required by:  OAR 860-030-0011

Statute

Order

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

Other

(For example, federal regulations, or requested by Staff)

Is this report associated with a specific docket/case?  No  Yes, docket number: UM 1893

List Key Words for this report. We use these to improve search results.

Energy Efficiency Avoided Cost Submission

Send the completed Cover Sheet and the Report in an email addressed to [PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

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

March 25, 2024

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

**RE: RE 182 UM 1893 PGE's Supplemental Energy Efficiency Avoided Cost Submission**

Portland General Electric Company (PGE) submits this supplemental compliance filing under RE 182 pursuant to Oregon Administrative Rule (OAR) 860-030-0011. PGE is submitting this supplemental filing, providing an alternative submission for Forward Energy Prices at the request of Staff. Staff and PGE met on March 21, 2024, to discuss PGE's compliance filing and Staff requested that PGE apply an operational forward energy price curve, then an interpolation year, before switching to the longer-term fundamental energy forecast from the IRP. Staff indicated that PacifiCorp uses this method to provide forward energy price data for Energy Efficiency Avoided Costs.

PGE has utilized tab 2a for alternative submissions in the workbook to provide the requested prices. PGE is providing an operational forward curve for years 2024 to 2028 and an interpolation for 2029, between the operational forward curve and the longer-term fundamental energy forecast from PGE's IRP. After 2030 the energy forecast is from the longer-term fundamental energy forecast from PGE's IRP.

All previous values submitted in the workbook template on March 1, 2024, remain unchanged.

Please direct any questions or comments regarding this filing to Chris Pleasant at (503) 464-2555. Please direct all formal correspondence and requests to the following email address [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com).

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing & Tariffs

Enclosure  
cc: Peter Kernan, OPUC

<b>Alternative Submissions</b>	<b>Rationale for alternative submission:</b> <i>Provide an overall rationale for providing alternative values in this box</i> In a meeting with Staff on 3/21/24, Staff expressed that they would like PGE to submit a more recent Operational Power Curve.
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**Forward Price Inputs**

<b>Real or Nominal?</b>	Nominal
<b>Dollar Year:</b>	1.31.24 MidC Price Curves.xlsx: 2024 LC 80 PGE's Response to OPUC DR 076 Attachment B: 2023
<b>Carbon Prices Additive?</b>	Embedded in Market Prices
<b>Carbon Value Units (\$/MWh or \$/Ton)</b>	
<b>Source and Pg #:</b>	
<b>Source Link or File Name:</b>	2024-2028: PGE's Operational Power Curve - 1.31.24 MidC Price Curves.xlsx 2029: Interpolation Year 2030-2043: IRP Curve - LC 80 PGE's Response to OPUC DR 076 Attachment B
<b>Source Notes:</b>	

**NOTES:**  
Please provide notes as to how this value relates to forward market prices. It can be expressed as a percentage of forward market prices, a set \$/MWh, or \$/ton. **Please identify the units in the box to the left**

Year	Date	HLH Total (\$/MWh)	LLH Total (\$/MWh)	HLH Carbon Cost (\$/MWh) (OR % of HLH Price that accounts for Carbon?)	LLH Carbon Cost (\$/MWh) (OR % of LLH Price that accounts for Carbon?)
2024	1/1/2024	244.51	190.61		
2024	2/1/2024	85.00	68.00		
2024	3/1/2024	69.00	59.50		
2024	4/1/2024	66.50	57.50		
2024	5/1/2024	53.50	38.00		
2024	6/1/2024	68.50	40.00		
2024	7/1/2024	144.00	61.00		
2024	8/1/2024	201.00	80.00		
2024	9/1/2024	152.00	69.00		
2024	10/1/2024	78.00	64.00		
2024	11/1/2024	93.00	75.00		
2024	12/1/2024	134.00	104.00		
2025	1/1/2025	137.49	107.97		
2025	2/1/2025	116.25	94.29		
2025	3/1/2025	80.96	61.76		
2025	4/1/2025	62.71	60.67		
2025	5/1/2025	52.35	38.75		
2025	6/1/2025	54.39	34.05		
2025	7/1/2025	137.64	63.96		
2025	8/1/2025	177.93	85.77		
2025	9/1/2025	143.68	73.54		
2025	10/1/2025	87.34	72.57		
2025	11/1/2025	97.51	80.68		
2025	12/1/2025	114.28	99.26		
2026	1/1/2026	121.13	103.00		
2026	2/1/2026	102.95	88.89		
2026	3/1/2026	84.41	73.91		
2026	4/1/2026	59.72	42.30		
2026	5/1/2026	55.41	36.42		
2026	6/1/2026	58.72	37.06		
2026	7/1/2026	123.29	81.13		
2026	8/1/2026	169.33	100.35		
2026	9/1/2026	123.96	84.26		
2026	10/1/2026	81.01	62.13		
2026	11/1/2026	89.95	68.84		
2026	12/1/2026	107.77	80.86		
2027	1/1/2027	106.31	82.48		
2027	2/1/2027	89.56	71.58		
2027	3/1/2027	73.25	58.88		
2027	4/1/2027	65.31	50.88		
2027	5/1/2027	60.78	44.28		
2027	6/1/2027	62.51	43.89		
2027	7/1/2027	112.63	81.73		
2027	8/1/2027	159.07	95.68		
2027	9/1/2027	115.85	87.48		
2027	10/1/2027	76.91	62.55		
2027	11/1/2027	85.90	70.45		
2027	12/1/2027	102.34	82.11		
2028	1/1/2028	97.01	81.45		
2028	2/1/2028	84.24	72.37		
2028	3/1/2028	69.41	60.00		
2028	4/1/2028	63.06	52.82		
2028	5/1/2028	59.24	45.39		
2028	6/1/2028	61.32	46.15		
2028	7/1/2028	108.14	84.00		
2028	8/1/2028	144.23	95.56		
2028	9/1/2028	110.14	89.79		
2028	10/1/2028	71.47	63.75		
2028	11/1/2028	78.31	70.00		
2028	12/1/2028	94.09	82.81		
2029	1/1/2029	108.51	94.31		
2029	2/1/2029	81.83	74.46		
2029	3/1/2029	55.55	51.18		
2029	4/1/2029	45.86	39.66		
2029	5/1/2029	40.47	29.29		
2029	6/1/2029	43.36	30.28		
2029	7/1/2029	134.85	100.31		
2029	8/1/2029	239.87	129.82		
2029	9/1/2029	139.89	114.62		
2029	10/1/2029	58.90	57.78		
2029	11/1/2029	70.71	69.65		
2029	12/1/2029	102.09	97.49		

2030	1/1/2030	46.00	42.71
2030	2/1/2030	38.24	37.05
2030	3/1/2030	26.62	30.95
2030	4/1/2030	11.82	12.07
2030	5/1/2030	2.94	4.45
2030	6/1/2030	1.10	1.38
2030	7/1/2030	21.99	22.93
2030	8/1/2030	34.46	33.32
2030	9/1/2030	37.31	32.67
2030	10/1/2030	36.70	35.21
2030	11/1/2030	44.72	41.95
2030	12/1/2030	51.54	47.29
2031	1/1/2031	45.48	43.11
2031	2/1/2031	38.25	36.94
2031	3/1/2031	26.63	29.02
2031	4/1/2031	9.41	10.10
2031	5/1/2031	4.68	5.09
2031	6/1/2031	1.04	2.57
2031	7/1/2031	22.17	20.98
2031	8/1/2031	33.85	30.80
2031	9/1/2031	34.90	33.89
2031	10/1/2031	38.50	36.14
2031	11/1/2031	47.12	42.74
2031	12/1/2031	52.43	49.76
2032	1/1/2032	47.31	44.92
2032	2/1/2032	33.15	31.36
2032	3/1/2032	27.70	28.49
2032	4/1/2032	7.11	8.41
2032	5/1/2032	0.19	2.60
2032	6/1/2032	(0.65)	0.52
2032	7/1/2032	21.23	19.87
2032	8/1/2032	33.59	33.05
2032	9/1/2032	35.05	34.53
2032	10/1/2032	38.62	36.18
2032	11/1/2032	49.50	47.15
2032	12/1/2032	55.91	53.77
2033	1/1/2033	49.17	47.60
2033	2/1/2033	39.01	39.73
2033	3/1/2033	27.92	27.25
2033	4/1/2033	6.62	9.79
2033	5/1/2033	1.52	2.68
2033	6/1/2033	(0.20)	0.39
2033	7/1/2033	20.63	20.11
2033	8/1/2033	33.03	33.57
2033	9/1/2033	33.92	35.06
2033	10/1/2033	36.38	38.37
2033	11/1/2033	49.33	46.78
2033	12/1/2033	56.42	54.61
2034	1/1/2034	50.64	48.93
2034	2/1/2034	36.75	39.55
2034	3/1/2034	26.21	28.91
2034	4/1/2034	8.37	9.86
2034	5/1/2034	0.05	0.56
2034	6/1/2034	0.25	0.33
2034	7/1/2034	19.60	18.98
2034	8/1/2034	32.84	35.27
2034	9/1/2034	33.85	34.82
2034	10/1/2034	37.18	38.60
2034	11/1/2034	46.51	46.17
2034	12/1/2034	56.04	51.89
2035	1/1/2035	51.36	49.99
2035	2/1/2035	38.39	37.34
2035	3/1/2035	26.29	29.35
2035	4/1/2035	6.71	9.55
2035	5/1/2035	2.25	3.22
2035	6/1/2035	1.76	2.19
2035	7/1/2035	19.05	20.28
2035	8/1/2035	32.38	33.93
2035	9/1/2035	33.76	35.46
2035	10/1/2035	39.46	39.88
2035	11/1/2035	49.09	47.34
2035	12/1/2035	60.51	56.33
2036	1/1/2036	51.13	49.53
2036	2/1/2036	32.08	33.60
2036	3/1/2036	24.19	28.58
2036	4/1/2036	8.21	10.53
2036	5/1/2036	4.34	4.87
2036	6/1/2036	4.06	4.26
2036	7/1/2036	15.06	19.05
2036	8/1/2036	30.86	32.59
2036	9/1/2036	31.55	33.65
2036	10/1/2036	34.27	37.19
2036	11/1/2036	48.33	46.44
2036	12/1/2036	56.48	56.68
2037	1/1/2037	49.99	48.80
2037	2/1/2037	37.07	39.31
2037	3/1/2037	26.14	27.37
2037	4/1/2037	9.39	11.00
2037	5/1/2037	7.04	7.40
2037	6/1/2037	6.76	7.04
2037	7/1/2037	14.44	15.64

2037	8/1/2037	31.61	31.31
2037	9/1/2037	30.56	34.37
2037	10/1/2037	35.14	38.97
2037	11/1/2037	48.92	48.38
2037	12/1/2037	59.09	56.92
2038	1/1/2038	51.25	50.60
2038	2/1/2038	37.02	39.43
2038	3/1/2038	24.48	29.32
2038	4/1/2038	9.21	11.45
2038	5/1/2038	6.15	6.76
2038	6/1/2038	6.40	6.12
2038	7/1/2038	14.58	16.76
2038	8/1/2038	28.57	32.46
2038	9/1/2038	29.56	33.06
2038	10/1/2038	33.81	38.16
2038	11/1/2038	45.55	48.18
2038	12/1/2038	59.50	57.46
2039	1/1/2039	51.77	49.68
2039	2/1/2039	37.65	42.32
2039	3/1/2039	24.71	27.04
2039	4/1/2039	9.57	10.17
2039	5/1/2039	7.13	7.78
2039	6/1/2039	6.82	6.62
2039	7/1/2039	13.50	14.98
2039	8/1/2039	29.84	30.41
2039	9/1/2039	27.00	33.63
2039	10/1/2039	32.77	39.09
2039	11/1/2039	48.92	48.52
2039	12/1/2039	62.09	62.67
2040	1/1/2040	54.49	55.39
2040	2/1/2040	33.92	34.42
2040	3/1/2040	23.48	30.56
2040	4/1/2040	8.67	10.61
2040	5/1/2040	6.11	7.15
2040	6/1/2040	5.88	6.33
2040	7/1/2040	13.02	13.99
2040	8/1/2040	29.59	31.89
2040	9/1/2040	31.10	32.36
2040	10/1/2040	35.79	39.31
2040	11/1/2040	49.58	53.37
2040	12/1/2040	64.55	63.58
2041	1/1/2041	55.80	55.27
2041	2/1/2041	41.54	46.19
2041	3/1/2041	23.07	27.02
2041	4/1/2041	8.65	10.01
2041	5/1/2041	5.93	7.54
2041	6/1/2041	5.97	6.67
2041	7/1/2041	11.65	12.89
2041	8/1/2041	30.42	30.71
2041	9/1/2041	29.68	33.85
2041	10/1/2041	37.79	40.44
2041	11/1/2041	54.59	54.73
2041	12/1/2041	70.68	69.67
2042	1/1/2042	60.11	59.70
2042	2/1/2042	43.19	45.43
2042	3/1/2042	23.15	26.51
2042	4/1/2042	8.38	10.82
2042	5/1/2042	5.53	7.31
2042	6/1/2042	5.48	6.82
2042	7/1/2042	13.35	14.01
2042	8/1/2042	32.15	30.49
2042	9/1/2042	29.01	35.28
2042	10/1/2042	38.53	41.67
2042	11/1/2042	55.49	55.27
2042	12/1/2042	72.09	70.05
2043	1/1/2043	60.99	60.78
2043	2/1/2043	43.05	48.03
2043	3/1/2043	21.76	29.07
2043	4/1/2043	8.65	10.81
2043	5/1/2043	5.66	7.60
2043	6/1/2043	5.73	6.87
2043	7/1/2043	11.23	12.34
2043	8/1/2043	29.69	31.07
2043	9/1/2043	28.87	31.90
2043	10/1/2043	39.61	42.49
2043	11/1/2043	56.90	59.85
2043	12/1/2043	75.93	74.60