

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 394

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Request for a General Rate Revision.

MEMORANDUM

As addressed in the July 12, 2021 memorandum in this docket, the Commission seeks to establish a process for obtaining revenue requirement and rate spread scenario runs in this proceeding. Specifically, the Commission seeks to implement a process under which limited company staff would be designated to run scenarios identified by the Commission or ALJ after the close of the record for purposes of assisting the Commissioners assess the impact of potential decisions. Additionally, the July 12, 2021 memorandum requested that parties address the safeguards that should be implemented within that process, including the use of a non-disclosure agreement.

The Commission solicited input from the parties on the proposed process and services agreement filed by Staff on November 19, 2021. No party filed comment.

The Commission has determined to accept the process proposed by Staff and PGE for possible use in this proceeding. In doing so, we note that despite being titled a “service agreement”, the Commission does not view these scenarios runs as “services” the company is providing to the Commission any more than responding to information requests, providing comments in a public meeting, or anything else a regulated entity does to assist in the Commission’s review of issues for decision. Additionally, this agreement does not reflect the level of confidentiality sought by the Commission, and that we consider to be warranted and reasonable to provide, consistent with our understanding of practices for similar agreements in other states. Despite these concerns, we will put this agreement into effect for this particular proceeding, but will continue to evaluate whether to constrain or utilize the arrangement at all in this case.

It remains a priority for the Commission to standardize a scenario run process for rate cases, but one that improves significantly on the process under this agreement.

Dated this 7<sup>th</sup> day of December, 2021, at Salem, Oregon.



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Nolan Moser  
Chief Administrative Law Judge