



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

September 3, 2020

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E., Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1708 Demand Response Pilot Evaluation, Residential Flexible Pricing Pilot and Direct Load Control Thermostat Pilot Program

Portland General Electric Company (PGE) hereby submits this filing regarding the following conditions under Commission Order No. 19-313.

- 1. At least annually, and not less than 90 days prior to the filing to adjust Schedule 135 tariff rates, submit program costs (including forecasted program costs) to Staff for review of prudence.*
- 2. No less than 90 days prior to filing to adjust tariff rates, hold at least one workshop to present pilot costs, findings, and any design updates.*
- 3. No less than 90 days prior to filing to adjust tariff rates, submit two combined reports on the pilots, which will provide third-party evaluations, cost summaries, estimated curtailments, and results of customer satisfaction surveys.*

PGE is requesting a waiver of the “90 days prior” condition due to unforeseen circumstances. PGE plans to file updates to Schedule 135 in mid-November with an effective date of January 1, 2021. An effective date of January 1, 2021 allows for Schedule 135 to align with the fiscal year. Unforeseen delays in the review process to complete the third-party evaluation of the Direct Load Control Thermostat pilot have caused a delay of a couple weeks getting the final evaluation ready. The third-party evaluator is applying final edits to the evaluation and will provide a final document to PGE shortly with a workshop to follow the evaluation filing.

PGE requests a waiver reducing the amount of days prior to filing to adjust tariff rates from 90 to 70 to provide Staff with appropriate time to review updates to Schedule 135 and adhere to PGE’s timeline of having pricing effective on January 1, 2021.

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If you have any questions or require further information, please contact Santiago Beltran Laborde at (503) 464-7902.

Please direct all formal correspondence and requests to the following e-mail address pge.opuc.filings@pgn.com.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

cc: UM 1708 Service List
Kacia Brockman, OPUC