



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

September 4, 2020

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

**RE: UM 1708 Residential Flexible Pricing Pilot and Direct Load Control
Thermostat Pilot Program Costs in Compliance with Order 19-313**

Portland General Electric Company (PGE) submits this work paper pursuant to Public Utility Commission of Oregon (OPUC or Commission) Order No. 19-313, filed in OPUC Docket No. UM 1708, that directs PGE to submit program costs for Residential Flexible Pricing Pilot (FLEX) and Direct Load Control Thermostat pilot (DLCT) to Staff for review of prudence.

These program costs are to be submitted on a timeline that is no less than 90 days prior to filing to adjust tariff rates for PGE's Rate Schedule 135 (Demand Response Cost Recovery Mechanism). PGE intends to file an update to Schedule 135 prices, effective January 1, 2021, to recover the costs to operate Schedules 5 (DLCT) and 6 (FLEX).

On September 3, 2020, PGE submitted a filing in UM 1708 requesting a waiver of the "90 days prior" condition due to unforeseen circumstances. PGE requested 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.

Attachment A is the work paper that provides cost detail for both FLEX and DLCT from their 2015, when they both launched, to June 2020 and a forecast of costs through 2021. FLEX Pilot costs are in Accounting Work Orders (AWOs) 1000004385 and 1000008181. DLCT Pilot costs are in AWOs 1000004433, 1000007300, 1000008721, and 3000001258. While the Commission approved PGE's application for deferred accounting in UM 1708, Attachment A is required to enable the OPUC's prudence review prior to deferral amortization.

Attachment A contains confidential information and is subject to Protective Order No. 14-402. The work paper is not included in this filing and will be submitted electronically.

Please direct any questions regarding this filing to Santiago Laborde at (503) 464-7902. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pqn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosure(s)

UM 1708

Attachment A

Confidential and Subject to Protective Order No. 14-402
Provided in Electronic Format Only
Program Costs for FLEX and DLCT Pilots
from 2015-2020 YTD