

Portland General Electric Company 121 SW Salmon Street • 1WTC0306 • Portland, OR 97204 portlandgeneral.com

February 5, 2021

Via Electronic Filing

Public Utility Commission of Oregon Attention: Filing Center P.O. Box 1088 Salem, OR 97308-1088

RE: Revised Filing; UM 1953 PGE's Green Energy Affinity Rider, Schedule 55, Phase 1, CSO Option, Rate and Credit Calculations, Submitted in Compliance with Order No. 19-075.

Dear Filing Center:

Following our January 22, 2021 compliance filing, Calpine and NIPPC raised issues regarding our classification of information in the work paper as highly confidential. Calpine noted that its expert could not review the energy and capacity credit calculations in our filing for compliance given that their expert did not have access to highly confidential information. After discussing the concerns with Staff yesterday, Portland General Electric Company (PGE) has reviewed its work paper and submits this expedited filing with some changes to the confidentiality designation of information contained in it. The purpose is to allow parties' experts the capability to check the energy and capacity credit calculations for compliance with Schedule 55 and Order No. 19-075, which is the purpose of this compliance filing. PGE is holding to the highly confidential designation for information that is highly competitive and protected by non-disclosure agreement, for example, the PPA price and cost information that could be used to derive the PPA price.

Confidential Attachment C is a revised copy of Highly Confidential Attachment A, removing the highly confidential information identified above. No information or data contained in the work paper has changed. PGE is filing this revision following Staff's completed review and finding our original filing compliant with Commission Order, placing it on the consent agenda for the Commission's public meeting February 11.¹ By copy to the service list in UM 1953, parties will be notified of this revision in confidentiality classification.

Confidential Attachment C provides the work paper demonstrating the rate and credit calculations that were performed in accordance with the filed tariff Schedule 55 using the IRP methodologies specified in the UM 1953 Phase I proceeding and Commission Order No. 19-075. As noted, information allowing review of compliance for the energy and capacity credits, is designated "regular" confidential and other competitive information remains highly confidential.

¹ See Staff Report filed February 3, 2021: https://edocs.puc.state.or.us/efdocs/HAU/um1953hau17722.pdf

UM 1953 PGE Revised Filing February 5, 2021 Page 2

As explained, Attachment C contains confidential information and is subject to Protective Order No. 18-260. It is being submitted electronically to puc.workpapers@state.or.us using an encrypted file. Additionally, PGE has provided Attachment C to eligible parties who previously requested the highly confidential material so their expert(s) may conduct a timely review of the credit calculations.

Sincerely,

/s/ Karla Wenzel for Robert Macfarlane

Robert Macfarlane Manager, Pricing and Tariffs

RM:np

UM 1953 Rate and Credit Calculations Submitted in Compliance with Order No. 19-075

Attachment C

Confidential Submitted under Protective Order No. 18-260

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the Confidential Documents in UM 1953 to be served by electronic mail to those parties whose e-mail addresses appear on the attached service list for OPUC Docket UM 1953 who have signed the Protective Order.

Dated at Portland, Oregon, this 5th day of February, 2021.

/s/ Karla Wenzel for Robert Macfarlane

Robert Macfarlane Manager, Pricing and Tariff Portland General Electric Company 121 SW Salmon Street, 1WTC0306 Portland, OR 97204 Telephone: 503-464-7805

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