



Portland General Electric Company
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Loretta I. Mabinton
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November 13, 2020

Via Electronic Filing

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

**Re: UM 1953 – PORTLAND GENERAL ELECTRIC COMPANY, Investigation into
Proposed Green Tariff**

Dear Filing Center:

Enclosed is Portland General Electric Company's Oral Argument Statement for filing in the above-referenced docket.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Loretta Mabinton".

Loretta Mabinton
Associate General Counsel

LM: bp

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1953

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Investigation into Proposed Green Tariff.

**ORAL ARGUMENT STATEMENT
OF PORTLAND GENERAL
ELECTRIC COMPANY**

Pursuant to the Administrative Law Judge (“ALJ”) Allan J. Arlow’s memorandum and ruling issued on October 26, 2020, Portland General Electric Company (“PGE”) hereby submits its Oral Argument Statement in the above-captioned proceeding scheduled for hearing on December 3, 2020. PGE will not be discussing confidential or highly confidential information at the hearing.

Issue No.	PGE’s Oral Argument Statement	Time Requested
1.	PGE Gear Program Size PGE requests the Commission approve the GEAR as a total of 500 MW and approve that PGE can procure the least cost, least risk resource(s) to support tranche 2 under a PPA(s), utility-owned resource(s) or a combination thereof.	5 Minutes
2.	PGE Gear Program Design Costs PGE requests the Commission (1) reaffirm that PGE’s GEAR program design is reasonable and in customers’ interest, and (2) acknowledge, consistent with Condition 8, the costs of the GEAR program be borne by GEAR participants and approve a risk adjustment fee that incorporates all program risks to fully insulate non-participating COS customers from the risk associated with the GEAR.	10 Minutes
3.	IRP and GEAR Cap Increase Interaction	5 Minutes

4.	<p>Reassessment of the Commission’s Original Nine Conditions PGE requests the Commission update the proposed conditions as summarized in Section II.E. of PGE’s testimony.</p> <p>Condition 6 – Mirroring Condition 7 – Utility Ownership Condition 8 - Cost Shifting Condition 9 – Commission Oversight</p>	20 Minutes
5.	<p>PGE Gear Program CSO Filing Process/ Post Phase 2 Process PGE requests the Commission approve a streamlined 90-day regulatory process that will permit PGE to respond to customers’ future demands for the GEAR product under the CSO once tranche 2 is full.</p> <p>PGE requests the Commission approve a streamlined process for future tranche increases beyond the 500 MW, to facilitate meeting the time requirements of interested customers.</p>	5 Minutes
6.	PGE’s response to issues raised by other Parties during Oral Argument	10 Minutes
	Total Time	55

Dated this 13th day of November, 2020.

Respectfully submitted,

/s/ Loretta Mabinton

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