



**Portland General Electric Company**  
*Legal Department*  
121 SW Salmon Street • Portland, Oregon 97204  
503-464-8926 • Facsimile 503-464-2200

**Douglas C. Tingey**  
*Associate General Counsel*

July 2, 2015

***Via Electronic Filing and U.S. Mail***

Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 1088  
Salem OR 97308-1088

**Re: UE 294 – PGE’s General Rate Case**

Attention Filing Center:

Pursuant to Judge Arlow’s June 29, 2015, Ruling in docket UE 294, enclosed for filing is an **Issues List**. This list has been compiled by all parties that have filed testimony in this docket: Portland General Electric Company, Staff of the Public Utility Commission, the Citizens’ Utility Board of Oregon, the Industrial Customers of Northwest Utilities, The Kroger Company, and the Small Business Utility Advocates.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "DCT", is written over the typed name of Douglas C. Tingey.

DOUGLAS C. TINGEY  
Associate General Counsel

DCT:jrb  
Enclosures

Pursuant to Judge Arlow’s Ruling in UE-294, the following is a list from the UE-294 Parties providing number/letter designation and a brief discussion of the open issues, as determined from the Parties’ opening testimony filed on June 15, 2015 as well as their opening power cost testimony filed on May 28, 2015. Staff Exhibit 700, Table A, lists issues for which there were no adjustments required as well as settled and contested issues. As of the date of this filing, the list below encompasses the contested, “open” issues identified by Staff and other parties. The parties do not waive their right to address issues not included in this list to the extent they are raised in subsequent phases of the proceeding.

<b>Issue</b>	<b>Party</b>	<b>Description</b>
S-O Cost of Capital	Staff/200; ICNU/300	Capital Structure; Return on Equity; Cost of Debt
S-3 Interest Synchronization	Staff/700	
I-1 Long Run Incremental Cost, Rate Spread, Rate Design	Staff/300	<p>On what basis should PGE recover its transmission revenue requirement?</p> <p>Should Schedules 32 and 47 prices be changed to move in the direction of consolidating the two schedules?</p> <p>Should Schedules 38 and 49 prices be changed to move in the direction of consolidating the two schedules?</p> <p>Should Schedules 47 and 49 be capped at a 12.5% increase in target revenues?</p> <p>Should Schedule 83 bear the impact of the cost increase cap to Schedule 49?</p> <p>Should the residential customer charge be increased by \$1.00 monthly?</p> <p>How should the customer impact offset mechanism work?</p>
I-4 Marginal Generation Cost	Staff/400, 500	<p>Should generation cost allocation be changed to allocate more costs to high load factor industrial customers and reduce costs allocated to residential customers?</p> <p>How should wind power be incorporated in the marginal generation cost model?</p>
I-5 Load Forecast	Staff/400, 500	Should the load forecast model be changed with regard to the price effect and energy efficiency effect?

I-6 Marginal Customer Costs/Postage	Staff/500	Were mailing expenses appropriately allocated in the customer marginal costs study? Should there be an adjustment in revenue requirement for postage expense in the test year?
I-8 Portfolio Options Programs	Staff/600	Whether PGE should conduct an audit of the administrative support costs for the program to assure that participating customers are paying the costs.
I-9 Accelerating the Refund from the Nuclear Fuel Adjustment	Staff/700,800	Whether PGE should accelerate the refund to customers to reduce rate impact in this general rate case.
I-10 Smart Meters	Staff/500	Staff is evaluating the cost of replacing smart meters and the monthly costs to read the replacement meters.
CUB-1 No January increase	CUB/100 (GRC)	Should there be a January 1, 2016 increase in rates for PGE customers?
CUB-3 Residential Exchange Credit	CUB/100 (GRC)	For purposes of rate spread, the Residential Exchange Credit should be excluded.
CUB-3 Other Revenue	CUB/100 (GRC)	Whether Other Revenue is under-forecasted.
CUB-4 Percentage allocation of Transmission Revenue Requirement to demand (capacity) and energy	CUB/100 (GRC)	On what basis—demand or energy—PGE should recover its transmission revenue requirement?
CUB-5 Customer charge increase	CUB/100 (GRC)	Whether PGE should increase its residential customer charge.
CUB-6 Expand PCAM deadbands	CUB/100 (GRC)	Whether the Commission should increase the PCAM deadbands.
CUB-7 Capital Structure	CUB/100 (GRC)	Whether PGE should analyze alternative capital structures to the one it has --50/50 capital structure--and reduce its equity portion by 5%.
ICNU-1 Capital Additions	ICNU/200	Whether PGE's capital additions' forecast is reasonable; whether rate base should be reduced.
ICNU-2 Marginal Capacity Resource	ICNU/200	Should the Company use Port Westward 2 or, in the

		alternative, an LMS 100 as the marginal capacity resource?
ICNU-3 Marginal Cost of Energy	ICNU/200	Should there be a dispatchability credit in the marginal cost of energy? Should fixed pipeline costs be included in the marginal cost of energy?
ICNU-4 Load-Following Credit	ICNU/200	How should the Schedule 90 load-following credit be allocated?
ICNU-5 Tariff Changes	ICNU/200	Should the Commission adopt PGE's proposed changes to Schedule 75? How should the Schedule 77 reservation payment rate be calculated and should customers be paid for the full year or only in participation months.
ICNU-6 Rate Spread/Rate Design	ICNU/400	How should franchise fees be allocated? How should the customer impact offset be implemented?
SBUA-1 Rate Impact on Small Business Customers	SBUA/100	Whether the impact of PGE's general rate case on small business customers is reasonable, fair and transparent?
Kroger-1 Rate Design	Kroger/100	Should PGE evaluate the differences in costs to serve Schedule 85 customers at secondary and primary in PGE's next general rate case?

Net Variable Power Cost Issues		
Issue Name/No.	Party	Description
PC-1 Coyote Springs FOR	STAFF/100	Should the statistical outlier year of 2013 be excluded in determining the plant's outage rate?
PC-2 Super Peak contract	ICNU/100, Staff/100, CUB/100	Should the cost of the Super Peak capacity contract be removed from the AUT?
CUB – 8 Timing of Carty for NVPC purposes	CUB/100 (NVPC)	Whether PGE should be required to account for the NVPC benefits if the plant comes online ahead of schedule.

CUB – 9 Double counting of wind forecasting errors between UE 294 and UM 1662	CUB/100 (NVPC)	PGE should not be permitted to recover for wind forecasting errors in its NVPC and proposed Renewable Resource Tracking Mechanism (UM 1662).
CUB – 10 Sales for Resale	CUB/100 (NVPC)	Whether PGE should analyze using sales for resale to reduce fixed costs by offsetting rate base.
ICNU-7 California-Oregon Border Margins	ICNU/100	Should PGE’s MONET model include economic benefits from the Company’s ability to transact at the California-Oregon border?
ICNU-8 Load Net of Wind Reserves	ICNU/100	Should PGE’s calculation of load net of wind reserves be modified in the MONET model?
ICNU-10 Pipeline Capacity Release Credits	ICNU/100	Should PGE account for pipeline release credits in the MONET model?