



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

September 18, 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.*

On September 3, 2020, PGE requested a waiver of the “90 days prior” to the above conditions due to unforeseen circumstances and delays in the review process to complete the third-party evaluation of the Direct Load Control Thermostat pilot and hold a workshop. The request for a waiver was approved in Order 20-300. PGE now requests a further waiver due to the Oregon wildfires and postponing the workshop at a later date and time when closures and hazardous air quality has improved.

At this time PGE has met the requirements of condition 1 on September 4, 2020, and condition 3 on September 11, 2020 with condition 2 remaining. The intent was for the workshop to be held jointly with the Demand Response Advisory Group meeting on September 17, 2020. Given rising concern over the Oregon wildfires PGE and Staff agreed to postpone the workshop to a later date in October. PGE provided all workshop materials to Staff on September 14, 2020 in advance of the meeting.

PGE requests a waiver reducing the amount of days prior to filing to adjust tariff rates from 70 to 40 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