



**Portland General Electric Company**  
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**DONALD J. LIGHT**  
*Assistant General Counsel*

February 24, 2017

***Via Electronic Filing***

Public Utility Commission of Oregon  
Filing Center  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, OR 97308-1088

Re: UM-1422 – Portland General Electric Company’s Application for Extension of  
OAR 860-038-0640, Compliance Filing Requirement

Attention Filing Center:

Enclosed for filing in Docket UM-1422 is Portland General Electric Company’s Application for  
Extension of OAR 860-038-0640, Compliance Filing Requirement.

If you have any questions or require further information, please do not hesitate to call me at  
(503) 464-8315.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Donald J. Light". The signature is written in a cursive, flowing style.

Donald J. Light  
Associate General Counsel

DJL:hp  
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**UM-1422**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Application for Extension of  
OAR 860-038-0640, Compliance Filing  
Requirement

**APPLICATION OF PORTLAND  
GENERAL ELECTRIC COMPANY**

Pursuant to OAR 860-038-0001(4), Portland General Electric Company (PGE or the Company) hereby requests that the Commission extend the June 1 filing requirement contained in OAR 860-038-0640, which requires the Company, in odd numbered years, to file its Code of Conduct audit report, prepared by an independent third party reviewer, by June 1, 2017. While PGE is in the process of engaging a third party reviewer to complete the review required under OAR 860-038-0640, PGE requests an extension of the deadline to file the third party report from June 1, 2017, to October 16, 2017.

**A. Good Cause**

PGE is requesting this extension to allow for adequate time for a third party to be secured, to conduct the audit, and write the report. Due to multiple regulatory priorities and staff turnover, PGE requires this additional time to file its 2017 audit report. PGE has conferred with Staff, who have no objection to this request.

PGE believes the requested extension will cause no harm to PGE's customers, potential competitors, or the Company. PGE proactively works to maintain an environment of awareness of the Code of Conduct rules and has a strong history of compliance with the Code of Conduct. PGE recently completed its biennial Code of Conduct training, which is delivered during even

numbered years to employees in workgroups potentially impacted by the Code of Conduct rules. Moreover, PGE has few affiliates and an immaterial level of competitive operations. In addition, granting an extension would not affect the Commission's ability to request information or investigate concerns regarding PGE's Code of Conduct compliance.

**B. Communications**

Communications regarding this Application should be addressed to the following email address: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Please mail hardcopies to:

Karla Wenzel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503-464-8718  
E-Mail: [Karla.Wenzel@pgn.com](mailto:Karla.Wenzel@pgn.com)

Donald Light  
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DATED this 24<sup>th</sup> day of February 2017.

Respectfully submitted,



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