

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 2, 2020**

REGULAR CONSENT EFFECTIVE DATE June 3, 2020

DATE: May 26, 2020

TO: Public Utility Commission

FROM: Scott Gibbens

THROUGH: Bryan Conway, Michael Dougherty, and John Crider **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1105/Advice No. 20-06)
Supplemental Revisions to Rule C on Emergency Curtailment & Updating
the Short-Term Emergency Curtailment Plan.

STAFF RECOMMENDATION:

Staff recommends that the Commission approve Portland General Electric's (PGE) proposed changes to Rule C and proposed changes to the Short-Term Emergency Curtailment Plan.

DISCUSSION:

Issue

Whether the Commission should approve PGE's supplemental revision to Advice No. 20-06 and allow PGE's suggested revisions to Rule C and proposed changes to the Short-Term Emergency Curtailment Plan to go into effect on June 3, 2020.

Applicable Rule

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable. See ORS 757.210. ORS 757.325 prohibits unjust discrimination, and ORS 757.310(2) prohibits a public utility from charging a customer a rate or an amount for service that is "different from the rate or amount the public utility charges any other customer for a like and contemporaneous service under substantially similar circumstances."

Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules. Filings that propose any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. See ORS 757.220; OAR 860-022-0015.

ORS 757.600 to 757.689 authorize and regulate the provision of the "direct access" (Direct Access) option in Oregon. The Commission's rules implementing these statutes are set forth in OAR Chapter 860, Division 038.

Analysis

Background

Commission Order No. 20-002 (Order) approved in part PGE's proposed NLDA tariff, filed as Advice No. 19-02. On March 20, 2020, PGE filed Advice No. 20-06, proposing amendments to Rule C regarding emergency curtailment and updating the Short-Term Emergency Curtailment Plan. In addition, Advice No. 20-06 proposed applicable updates to Schedule 689, New Large Load Cost-of-Service Opt-Out, as well as a few housekeeping changes to the schedules. At the April 21, 2020, Public Meeting, the Commission denied PGE's requested changes to Rule C and the associated Schedule 689 Special Condition tariff changes. The Commission directed PGE to refile the housekeeping tariff items separately. The purpose of this filing is to comply with the Commission's direction following the April 21, 2020 Public Meeting, to refile the housekeeping changes.

Second Supplemental Advice No. 20-06 Changes

PGE proposes the following changes as a part of Advice No. 20-06:

Rule C

- Grammatical Changes.
- Change from "Curtailment Operating Procedures" to "Curtailment Operating Plan".
- Reference to NERC Standards and Reliability Coordinator (RC) requirements instead of Willamette Valley/Southwest Washington Area (WILSWA) and Western Electricity Coordinating Council (WECC) standards.

Short-Term Emergency Curtailment Plan

- Inclusion of applicable NERC Emergency Alert Levels

Analysis

In reviewing the Company's application and Commission direction, Staff has no concerns regarding the proposed changes made by PGE. In general, Staff finds the

changes serve to update the applicable standards to those that PGE currently operates under. PGE no longer follows the standards set by WILSWA and WECC and instead uses the applicable NERC and RC standards. This is a reasonable change and Staff finds it prudent to reflect these changes in Rule C. The other changes do not result in a material change to the substance of the tariff or Curtailment Plan, but provide more clarity to the nature and substance. PGE has removed all references and specific application to Schedule 689, New Load Direct Access, which were the substantive changes the Commission rejected at the April 21, 2020, Public Meeting. Staff found no errors in the Company's filing.

Conclusion

The Company's proposed changes are in compliance with the Commission's previous direction and Staff finds all of the changes reasonable. Staff found no errors and had no concerns with the Company's filing. Staff finds that the filed tariff sheets will result in fair, just, and reasonable rates.

PROPOSED COMMISSION MOTION:

Approve proposed changes to Rule C and proposed changes to the Short-Term Emergency Curtailment Plan and allow the filed tariff sheets to go into effect on June 3, 2020.