

**OREGON PUBLIC UTILITY COMMISSION
INTRAOFFICE CORRESPONDENCE**

DATE: September 2, 2021

TO: File through Caroline Moore

FROM: Scott Gibbens

SUBJECT: PORTLAND GENERAL ELECTRIC: (Docket No. ADV 1264/UE 396). Updates to Portland General Electric's Schedule 55 Large Nonresidential Green Energy Affinity Rider, Effective September 1, 2021. Compliance Filing of Advice No. 21-11.

In Commission Order No. 21-263, the Commission directed the Company to amend its advice filing to include a more descriptive process for contracting in the Customer Supplied Option (CSO) and additional filing requirements for a potential utility owned resource within the program.

Staff and PGE worked collaboratively together to implement the changes directed by the Commission at the August 10, 2021 public meeting. The changes included additional language which clarified PGE's role in the contracting process of a CSO resource procurement. It also included a description of the filing requirements which PGE would follow should it offer or pursue a Company-owned resource for utilization within the program.

Staff reviewed the compliance filed on August 30, 2021 and found that it included a change to the tariff language which was not previously contemplated by the Commission in the original advice filing. Following a discussion with the Company, PGE agreed to remove the additional language from the compliance filing as it did not relate to the direction provided by the Commission at the August 10, 2021. PGE filed replacement sheets on August 31, 2021, which removed the language.

The proposed change will impact the operations of the second tranche of the GEAR. There is no direct financial impact as a result of these changes, but instead it will provide a better description of the program operations and customer protections.

Staff found the tariffs to be correct, and finds that the tariffs result in fair, just, and reasonable rates.

Based on the review of PGE application, Staff concludes that the proposed revisions are consistent with the Commission direction provided in Order No. 21-263 and the tariff sheets should be allowed to go into effect on September 1, 2021.