



# Oregon

Kate Brown, Governor

## Public Utility Commission

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July 31, 2019

### ***Via Electronic Filing (Errata Filing)***

OREGON PUBLIC UTILITY COMMISSION  
ATTENTION: FILING CENTER  
PO BOX: 1088  
SALEM OR 97308-1088

UE 358: In the Matter of PORTLAND GENERAL ELECTRIC  
COMPANY, Advice No. 19-02, New Load Direct Access Program.

OPUC makes correction to Staff's Opening Testimony filed July 18, 2019.

Staff/100, Gibbens/16 at line 3, Staff has identified an error in its calculation of the cost per added day of reliability. The corrected value should be \$1.3 million per added day of reliable power as opposed to \$1.8 million.

Redline page showing the error and a clean replacement page are attached with this filing.

*/s/ Kay Barnes*

Kay Barnes

PUC- Utility Program

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1 schedule 489 customers, this would equate to over \$13 million a year, or  
2 roughly \$900,000 per customer based on the usage filed in PGE's last rate  
3 case. This means that each customer would pay roughly \$1.8 million per day of  
4 added reliable power under this charge. This is an amount where the  
5 economics of the business might favor shutting down for the day or even to  
6 invest in on-site generation to handle this risk.

7 **Q. Please explain Staff's second concern regarding choice.**

8 A. The second concern follows from the first. One of the main value propositions  
9 for Direct Access is customer choice. PGE's proposal removes the customer's  
10 ability to choose where it gets its resource adequacy from, the desired level of  
11 resource adequacy, and how it gets its resource adequacy.

12 By choosing direct access, customers are effectively choosing a power supply  
13 other than the utility's least cost/least risk planning. Customers instead have  
14 the option to procure power from any number of providers. PGE's proposed  
15 RAD changes that dynamic so that direct access customers are required to  
16 purchase capacity from PGE, and do not get a choice as to who ensures there  
17 is a sufficient amount of power to meet their energy needs.

18 Direct Access customers may also not want the same level of reliable power  
19 as the utility deems necessary. If these customers are sophisticated and large  
20 enough to identify costs and risks for themselves regarding where to procure  
21 power, it can be assumed they are also sophisticated enough to optimize the  
22 level of reliability that fits their needs as well. Certain customers may require  
23 reliability at the level PGE is ensuring, but some may not require that. The cost

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