

August 7, 2020

Public Utility Commission of Oregon Attn: Filing Center 201 High Street, S.E. P.O. Box 1088 Salem, OR 97308-1088

RE: Advice No. 20-22, Schedule 136 Oregon Community Solar Program Cost Recovery Mechanism Methodology of Bill Credits

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rules 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **September 23, 2020**:

First Revision of Sheet No. 136-3

PGE submitted a compliance filing (Advice No. 20-13) pursuant to OPUC Order No. 20-173 which was issued at the May 19, 2020 Public Meeting. In OPUC Order No. 20-173, it stated that PGE will need to refile at a later date clarifying language on the methodology for the treatment of bill credits in Schedule 136 Oregon Community Solar Program. The purpose of this filing is to provide a proposal to allocate collections for the payments for bill credits.

On July 16, 2020 PGE held a workshop with Commission Staff and stakeholders, including representatives from AWEC, Fred Meyer, and Walmart, to discuss the methodology update. The parties were unable to come to a consensus regarding the allocation methodology. PGE's revised proposal allocates costs based on all revenues, with direct access priced at cost of service. This proposal is meant to recognize that the payments are driven by public policy. PGE's original proposal allocated costs based on generation revenues, with direct access priced at cost of service.

To satisfy the requirements of OARs 860-022-0025(2), PGE provides the following response:

The changes do not increase, decrease, otherwise change existing rates, or impact revenues.

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Please direct questions or comments regarding this filing to Santiago Beltran Laborde at (503) 464-7902.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane Manager, Pricing & Tariffs

Enclosure

cc: UE 380 and UM 2024 Service Lists

SCHEDULE 136 (Concluded)

SPECIAL CONDITION (Continued)

3. Costs recovered through this schedule will be allocated to each schedule using the applicable schedule's forecasted energy on the basis of an equal percent of revenue applied on a cents per kWh basis to each applicable rate schedule, with long-term opt out and new load direct access customers priced at the equivalent cost of service rate schedule.

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