

December 14, 2018

#### **VIA ELECTRONIC FILING**

Public Utility Commission of Oregon 201 High Street SE, Suite 100 Salem, OR 97301-3398

Attn: Filing Center

RE: Advice No. 18-010—Schedule 293—New Large Load Direct Access Program

In compliance with ORS 757.205, OAR 860-022-0025, and OAR 860-038-0710, PacifiCorp d/b/a Pacific Power encloses for filing proposed tariff pages associated with Tariff P.U.C. OR No. 36, which sets forth all rates, tolls, charges, rules, and regulations applicable to electric service in Oregon. This filing includes new tariffs along with modifications to existing tariffs necessary to implement the New Large Load Direct Access program in compliance with Public Utility Commission of Oregon (Commission) Order No. 18-341. PacifiCorp respectfully requests a March 1, 2019 effective date.

Fourth Revision of Sheet No. INDEX-2	Tariff Index	Table of Contents - Schedules
Eighth Revision of Sheet No. INDEX-4	Tariff Index	Table of Contents - Schedules
Original Sheet No. 293-1	Schedule 293	New Large Load Direct Access Program Cost of Service Opt-Out
Original Sheet No. 293-2	Schedule 293	New Large Load Direct Access Program Cost of Service Opt-Out
Original Sheet No. 293-3	Schedule 293	New Large Load Direct Access Program Cost of Service Opt-Out
Original Sheet No. 848-1	Schedule 848	Large General Service 1,000 KW and Over Direct Access Delivery Service – Distribution Only
Original Sheet No. 848-2	Schedule 848	Large General Service 1,000 KW and Over Direct Access Delivery Service – Distribution Only
Twentieth Revision of Sheet No. 90	Schedule 90	Summary of Effective Rate Adjustments
Tenth Revision of Sheet No. 91-1	Schedule 91	Low Income Bill Payment Assistance Fund
Second Revision of Sheet No. R1-2	Rule 1	Definitions

Second Revision of Sheet No. R1-3	Rule 1	Definitions
First Revision of Sheet No. R1-4	Rule 1	Definitions
First Revision of Sheet No. R1-5	Rule 1	Definitions
First Revision of Sheet No. R21-6	Rule 21	General Rules and Regulations Direct Access
First Revision of Sheet No. R22	Rule 22	General Rules and Regulations Direct Access Service Election

This filing implements the New Large Load Direct Access Program (NLDA Program) for 2019, and going forward, consistent with Order No. 18-341 in docket AR 614.

To support this filing and meet the requirements of OAR 860-022-0025 and OAR 860-038-0710, PacifiCorp submits the tariff sheets listed above along with the following discussion.

### Schedule 293 - New Large Load Direct Access Program Cost of Service Opt-Out

Schedule 293 sets forth the requirements for new, large load nonresidential consumers to opt-out of cost of service electric service from PacifiCorp, in compliance with the requirement of OAR 860-038-0710(1). The consumer must notify PacifiCorp of its election for this program in accordance with Rule 22, and each new large load must be separately metered, or have its usage measurement based on a determination that has comparable accuracy and is mutually agreeable between the company and the consumer.<sup>1</sup> The consumer's load must meet or exceed 10 aMW for at least one period of 12 consecutive months within the first 36 months of receiving service.<sup>2</sup> If the consumer's load does not meet this requirement, PacifiCorp will provide written notification to the consumer and Commission of its proposal to move the consumer to the appropriate cost-of-service rate schedule,<sup>3</sup> but will not switch the consumer for 90 days after the written notification.<sup>4</sup> The consumer will have 60 days to provide a written response.<sup>5</sup>

Participation in the NLDA Program is limited to a cap equal to six percent of weather normalized annual load in calendar year 2017.<sup>6</sup> Accordingly, total eligible load for PacifiCorp is 89 megawatts.

Consumers seeking service under Schedule 293 must contract with energy resources that do not include any allocation of coal-fired resources, and provide a signed affidavit to PacifiCorp

<sup>&</sup>lt;sup>1</sup> OAR 860-038-0710(1).

<sup>&</sup>lt;sup>2</sup> OAR 860-038-0710(2)(b).

<sup>&</sup>lt;sup>3</sup> OAR 860-038-0750(1).

<sup>&</sup>lt;sup>4</sup> OAR 860-038-0750(1)(b).

<sup>&</sup>lt;sup>5</sup> OAR 860-038-0750(1)(a).

<sup>&</sup>lt;sup>6</sup> Order No. 18-341 at 7.

stating that the energy supplied to service the consumer's load will meet the requirements of OAR 860-038-0730(1).

In accordance with OAR 860-038-0740(3), Schedule 293 provides a Fixed Generation Transition Adjustment.<sup>7</sup> The Fixed Generation Transition Adjustment is based on 20 percent of the company's fixed generation rates and will be charged for the first five years of service to the consumer under the NLDA Program. Fixed generation rates include Schedule 200, Base Supply Service, along with any other rates that collect non-net power cost generation costs in effect during the five-year transition period for each consumer.<sup>8</sup> The company's consumers on the existing direct access programs pay the fixed generation rates included in the Fixed Generation Transition Adjustment.<sup>9</sup> At the end of the applicable five-year period, consumers continuing to participate in the NLDA Program will no longer be subject to the Fixed Generation Transition Adjustment.

Schedule 293 also provides for assessment of a \$400 per month administration fee. <sup>10</sup> The administration fee is designed to cover the costs of program administration that are incremental to the administration that the company experiences for its existing direct access programs. Incremental administration includes manual billing as well as monitoring the loads for a participating consumer's affiliated consumer(s) to facilitate the accurate billing of the Existing Load Shortage Transition Adjustment described in more detail below.

Additionally, if the consumer switches to standard offer or cost-based service, resulting in an increase to rates for existing cost-of-service customers by more than 0.5 percent, the consumer electing to switch to standard offer service or cost-based service will be subject to a forward-looking rate adder, Company Supply Service Access Charge, for four years. The 0.5 percent assessment is a reasonable threshold for the Company Supply Service Access Charge that represents a material and significant impact to customers. For a typical residential customer who uses 900 kilowatt hours (kWh) per month, a 0.5 percent increase would be approximately 49 cents a month. To determine whether a participating consumer's switch to standard offer or cost-based service would cause this threshold to be met, the company will multiply the price of the Company Supply Service Access Charge by an average of four years of that consumer's forecast level of load and divide by the total base supply and delivery revenues for the company's existing Oregon cost-of-service consumers. PacifiCorp proposes an initial Company Supply Service Access Charge of 0.000 cents per kWh. Presently, the cost does not exceed the benefit of bringing a customer onto PacifiCorp's supply service. PacifiCorp will update the company's Supply Service Access Charge annually as part of its Transition Adjustment Mechanism where

<sup>&</sup>lt;sup>7</sup> OAR 860-038-0740(3)(a).

<sup>&</sup>lt;sup>8</sup> This includes Schedule 200, Schedule 80 (Generation Investment Adjustment), Schedule 196 (Adjustment to Remove Deer Creek Mine Investment from Rate Base), Schedule 197 (Deer Creek Mine Undepreciated Investment Adjustment), Schedule 199 (Klamath Dam Removal Surcharges), Schedule 203 (Renewable Resource Deferral Adjustment), Schedule 204 (Oregon Solar Incentive Program Deferral), and Schedule 205 (TAM Adjustment for Other Revenues).

<sup>&</sup>lt;sup>9</sup> At the end of the five year transition, consumers on Schedule 296 will no longer pay these rates.

<sup>&</sup>lt;sup>10</sup> OAR 860-038-0740(3)(b).

<sup>&</sup>lt;sup>11</sup> OAR 860-038-0720(3).

transition adjustments are determined for existing load direct access consumers.<sup>12</sup> PacifiCorp proposes that the Company Supply Service Access Charge be calculated as the incremental difference between the four-year levelized cost of capacity that is calculated for avoided cost and the fixed generation rates included in the calculation of the Fixed Generation Transition Adjustment described above. This proposed calculation fairly assigns the new load direct access consumer that is switching to cost-of-service the additional fixed cost associated with the company's obligation to serve that consumer less the additional recovery that will be received from that consumer for existing fixed generation in rates.

Finally, Schedule 293 includes an Existing Load Shortage Transition Adjustment, in compliance with OAR 860-038-0740(4). An Existing Load Shortage is the larger of zero or a consumer's average historic cost-of-service load, plus incremental demand side management, less the average cost-of-service eligible load during the previous 60 months. The Existing Load Shortage Transition Adjustment will be applied to a consumer's existing load shortage and for the existing load shortage for all of the consumer's affiliated consumers. The Existing Load Shortage Transition Adjustment rate during the first five years after enrollment is 75 percent of fixed generation rates plus the Transition Adjustments in Schedule 294. The Existing Load Shortage Transition Adjustment rate for consumers after the first five years of enrollment is 100 percent of fixed generation rates plus the Transition Adjustments in Schedule 294. PacifiCorp will notify the consumer at least 30 days before charging the Existing Load Shortage Transition Adjustment, and the consumer may be exempted from the adjustment if the consumer can demonstrate that the change in load was not due to load shifting activity as described in OAR 860-038-0740.

# Schedule 848 – Large General Service 1,000 KW and Over Direct Access Delivery Service – Distribution Only

PacifiCorp has created a new rate schedule for distribution only service, Schedule 848, Large General Service 1,000 KW and Over Direct Access Delivery Service – Distribution Only. New Large Load Direct Access consumers will take service under this new delivery service schedule that sets forth the rates applicable to these consumers. The tariff is similar to Schedule 748 for direct access consumers but excludes generation related rates and rate references that do not apply to distribution only consumers such as Schedule 200, Base Supply Service and Schedule 200 related System Usage Charges. This tariff will be applicable to NLDA Program consumers with loads over 1,000 kilowatts as well as consumers with loads over 1,000 kilowatts who have completed the five-year transition period under the company's five-year cost of service opt out program in Schedule 296, Transition Adjustment, Five-Year Cost of Service Opt-Out.

<sup>&</sup>lt;sup>12</sup> OAR 860-038-0720(5).

<sup>&</sup>lt;sup>13</sup> OAR 860-038-0740(4)(b).

<sup>&</sup>lt;sup>14</sup> OAR 860-038-0740(4)(a).

<sup>&</sup>lt;sup>15</sup> OAR 860-038-0740(4)(c)(A).

<sup>&</sup>lt;sup>16</sup> OAR 860-038-0740(4)(c)(B).

Transmission service is addressed in PacifiCorp's Open Access Transmission Tariff (OATT), on file with the Federal Energy Regulatory Commission (FERC). PacifiCorp has filed revisions to Attachment M to its OATT concurrently with this filing to include the NLDA Program and clarify the process, pricing, and communication requirements for direct access consumers in Oregon.<sup>17</sup> Transmission service to direct access consumers in Oregon will continue to be provided on a non-discriminatory basis in compliance with the OATT and FERC requirements.

### Schedule 90 – Summary of Effective Rate Adjustments

PacifiCorp has revised Schedule 90 to include Schedule 293 and Schedule 848.

### Schedule 91 – Low Income Bill Payment Assistance Fund

PacifiCorp has revised Schedule 91 to include Schedule 848.

#### **Rule 1 – Definitions**

In order to effectuate the NLDA Program, PacifiCorp has included three new definitions in Rule 1: New Large Load; Cost-of-Service Eligible Load; and NAICS Code.

### Rule 21 – General Rules and Regulations Direct Access

PacifiCorp has revised Sheet No. R21-6 to clarify that a Direct Access Service Request is required for the election of all Direct Access Service from an ESS.

#### Rule 22 – General Rules and Regulations Direct Access Service Election

PacifiCorp has revised Rule 22 to include the requirement that a consumer seeking service to a new large load through the NLDA Program described in Schedule 293 must submit binding written notification of its intent to elect to participate in the NLDA Program. Such notification must be received by PacifiCorp at the earlier of execution of a written agreement for electric service from PacifiCorp as a cost-of-service customer or one year before the expected starting date for the incremental new load. The requirement is waived for eligible consumers that have entered into a written agreement with PacifiCorp before September 30, 2018, that includes a provision stating an intent to receive distribution service for load which PacifiCorp has not planned to provide generation supply service. Page 18.

<sup>&</sup>lt;sup>17</sup> PacifiCorp's Proposed OATT Attachment M revisions were filed in Docket No. ER19-564-000, and are available at <a href="https://www.ferc.gov/docs-filing/elibrary.asp">https://www.ferc.gov/docs-filing/elibrary.asp</a>.

<sup>&</sup>lt;sup>18</sup> OAR 860-038-0740(1).

<sup>&</sup>lt;sup>19</sup> *Id* 

<sup>&</sup>lt;sup>20</sup> OAR 860-038-0740(2).

The proposed tariff changes described herein will affect those consumers that choose to participate in the NLDA Program; therefore the number of consumers and the rate impact to them is not known at this time.

It is respectfully requested that all formal data requests regarding this filing be addressed to:

By e-mail (preferred): <a href="mailto:datarequest@pacificorp.com">datarequest@pacificorp.com</a>

By regular mail: Data Request Response Center

**PacifiCorp** 

825 NE Multnomah, Suite 2000

Portland, Oregon 97232

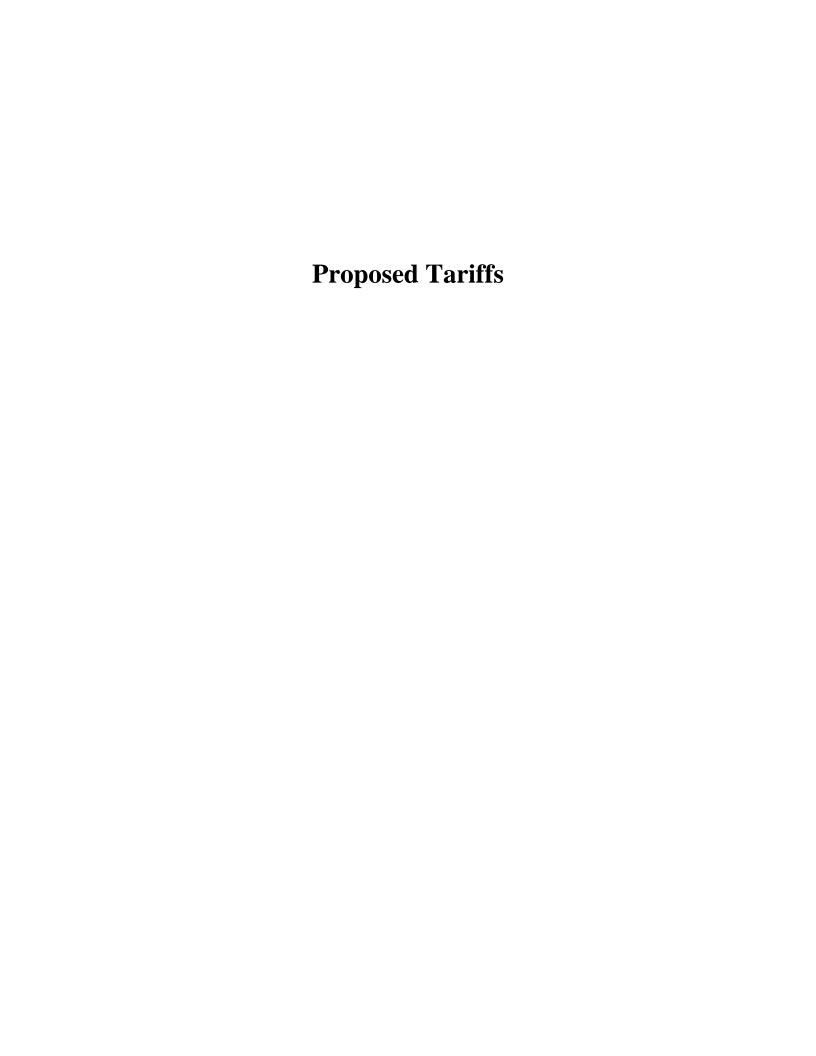
Informal questions may be directed to Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

Sincerely,

Etta Lockey

Vice President, Regulation

**Enclosures** 





## OREGON Tariff Index

#### TABLE OF CONTENTS - SCHEDULES

Page 2

Inde	x No.		
In	dex-1	Title Page	
In	dex-2	Table of Contents - Schedules	
In	dex-3	Table of Contents - Schedules	
In	dex-4	Table of Contents - Schedules	
In	dex-5	Table of Contents - General Rules and Regulations	
In	dex-6	Service Area Map - State of Oregon	
Sche	edule No.		
		DELIVERY SERVICE	
	4	Residential Service	
	5	Separately Metered Electric Vehicle Service for Residential Consumers	
	15	Outdoor Area Lighting Service - No New Service	
	23	General Service – Small Nonresidential	
	28	General Service – Large Nonresidential 31 kW to 200 kW	
	30	General Service – Large Nonresidential 201 kW to 999 kW	
	41	Agricultural Pumping Service	
	45	Public DC Fast Charger Optional Transitional Rate	
	47	Large General Service – Partial Requirements 1,000 kW and Over	
	48	Large General Service 1,000 kW and Over	
	50	Mercury Vapor Street Lighting Service – No New Service	
	51	Street Lighting Service – Company-Owned System	
	52	Street Lighting Service – Company-Owned System – No New Service	
	53	Street Lighting Service – Consumer-Owned System	
	54	Recreational Field Lighting – Restricted	
	76R	Large General Service/Partial Requirements Service – Economic Replacement Power Rider	
		DIRECT ACCESS DELIVERY SERVICE	
	723	General Service – Small Nonresidential	
	728	General Service – Large Nonresidential 31 kW to 200 kW	
	730	General Service – Large Nonresidential 201 kW to 999 kW	
	741	Agricultural Pumping Service	
	745	Public DC Fast Charger Optional Transitional Rate	
	747	Large General Service – Partial Requirements 1,000 kW and Over	
	748	Large General Service 1,000 kW and Over	
	751	Street Lighting Service – Company-Owned System	
	751 752	Street Lighting Service – Company-Owned System – No New Service	
	752 753	Street Lighting Service – Company-Owned System  Street Lighting Service – Consumer-Owned System	
	753 754	Recreational Field Lighting –Restricted	
	754 776R	Large General Service/Partial Requirements Service – Economic Replacement	
		Service Rider	
	848	Large General Service 1,000 kW and Over – Distribution Only	(N)



## OREGON Tariff Index

#### TABLE OF CONTENTS - SCHEDULES

Page 4

# Schedule No.

	OTHER	
8	EEAST On-Bill Repayment Program	
9	Residential Energy Efficiency Rider – Optional Weatherization Services – No	
	New Service	
10	Voluntary On-Bill Repayment Program	
60	Company Operated Electric Vehicle Charging Station Service	
73	Large Customer Curtailment Option	
105	Irrigation Load Control Program	
115	Commercial and Industrial Energy Efficiency Retrofit Incentives – 20,000 Square	
	Feet or Less– No New Service	
116	Commercial and Industrial Energy Efficiency Retrofit Incentives  No New Service	
125	Commercial and Industrial Energy Services  No New Service	
135	Net Metering Service – Optional for Qualifying Consumers	
136	Net Metering Option Volumetric Incentive Rate Pilot – Optional for Qualifying	
	Customers	
137	Competitive Bid Option Volumetric Incentive Rate Pilot – Optional for Qualifying	
	Customers	
293	New Large Load Direct Access Program – Cost Of Service Opt-Out	(N)
300	Charges as Defined by the Rules and Regulations	( )
400	Special Contracts	
600	ESS Charges	
	9  10 60 73 105 115  116 125 135 136  137  293 300 400	8 EEAST On-Bill Repayment Program 9 Residential Energy Efficiency Rider — Optional Weatherization Services — No New Service 10 Voluntary On-Bill Repayment Program 60 Company Operated Electric Vehicle Charging Station Service 73 Large Customer Curtailment Option 105 Irrigation Load Control Program 115 Commercial and Industrial Energy Efficiency Retrofit Incentives — 20,000 Square Feet or Less— No New Service 116 Commercial and Industrial Energy Efficiency Retrofit Incentives— No New Service 125 Commercial and Industrial Energy Services— No New Service 135 Net Metering Service — Optional for Qualifying Consumers 136 Net Metering Option Volumetric Incentive Rate Pilot — Optional for Qualifying Customers 137 Competitive Bid Option Volumetric Incentive Rate Pilot — Optional for Qualifying Customers 138 New Large Load Direct Access Program — Cost Of Service Opt-Out 139 Charges as Defined by the Rules and Regulations 1400 Special Contracts



# NEW LARGE LOAD DIRECT ACCESS PROGRAM COST OF SERVICE OPT-OUT

Page 1

(N)

#### **Available**

In all territory served by the Company in the State of Oregon.

#### **Applicable**

To New Large Load for Nonresidential Consumers taking Delivery Service under Schedule 848 who have chosen to opt-out of the Company's Cost-Based Supply Service prior to the inception of electric service to the New Large Load. Consumer must officially notify the Company of its election for this program in accordance with Rule 22 of this tariff. New Large Load must be separately metered or have its usage measured based on a determination that has comparable accuracy and is mutually agreeable between the Company and the Consumer.

#### **Total Eligible Load**

A total of 89 MW will be accepted under this program.

#### **Administration Fee**

Consumers taking service under this program will pay the following program Administration Fee: \$400 per month

#### **Fixed Generation Transition Adjustment**

A transition adjustment of 20 percent of fixed generation rates will be charged for the first five years of service to the Consumer under this program. Fixed generation rates include Schedule 200, Base Supply Service rates along with any other rates which collect non-net power cost generation costs that are in effect during the five year transition period for each Consumer. The adjustment will be applied at 20 percent of the rates included in the Company's effective tariffs applicable to Delivery Service Schedule 48. At the end of the applicable five-year period, Consumers who have elected this option will no longer be subject to the fixed generation transition adjustment.

List of effective schedules with fixed generation rates which will incur a 20 percent Fixed Generation Transition Adjustment:

Schedule 200, Base Supply Service

Schedule 80, Generation Investment Adjustment

Schedule 196, Adjustment to Remove Deer Creek Mine Investment from Rate Base

Schedule 197, Deer Creek Mine Undepreciated Investment Adjustment

Schedule 199, Klamath Dam Removal Surcharges

Schedule 203, Renewable Resource Deferral Adjustment

Schedule 204, Oregon Solar Incentive Program Deferral

Schedule 205, TAM Adjustment for Other Revenues

#### **Existing Load Shortage Transition Adjustment**

The Existing Load Shortage Transition Adjustment will be applied to the Existing Load Shortage of the Consumer and for the Existing Load Shortage for all of the Consumer's affiliated Consumers. An affiliated Consumer is a Consumer for which a controlling interest is held by another Consumer who is engaged in the same line of business as the holder of the controlling interest. Existing Load Shortage means the larger of zero or a Consumer's Average Historical Cost-of-Service Load plus Incremental Demand-Side Management less the average Cost-of-Service Eligible load during the previous 60 months. Average Historical Cost-of-Service Load means the average monthly Cost-of-Service Eligible Load during the 60 month period beginning five years prior to the date the Consumer gives binding notice of participation in this program.

(continued)

(N)

P.U.C. OR No. 36



# NEW LARGE LOAD DIRECT ACCESS PROGRAM COST OF SERVICE OPT-OUT

Page 2

(N)

#### **Existing Load Shortage Transition Adjustment (continued)**

Incremental Demand-Side Management means the effective net impact of energy efficiency measures and demand response implemented at a facility after a Consumer gives binding notice of participation in this program.

The Existing Load Shortage Transition Adjustment rate for Consumers during the first five years after enrollment is 75 percent of fixed generation rates plus the Transition Adjustments in Schedule 294. The Existing Load Shortage Transition Adjustment rate for Consumers after the first five years of enrollment is 100 percent of fixed generation rates plus the Transition Adjustments in Schedule 294. Fixed generation rates are the same rates as defined for the Fixed Generation Transition Adjustment above.

The Company will notify Consumer at least 30 days prior to charging the Existing Load Shortage Transition Adjustment that an Existing Load Shortage has been identified and the estimated amount of that load shortage. A Consumer may be exempted from the Existing Load Shortage Transition Adjustment if the Consumer can demonstrate that the change in load in question is not due to load shifting activity as described in OAR 860-038-0740. To make this demonstration, the Consumer must submit a written request for exemption to the Company including a detailed explanation for the change in load and any available supporting documentation. The Company will notify the Consumer of approval or denial of the request within 90 days of receipt of such request. The Consumer will not be charged the Existing Load Shortage Transition Adjustment during the pendency of the Consumer's request for an exemption.

#### **Energy Supply**

The Consumer must elect to purchase energy from an ESS (Direct Access Service) for New Large Load under this program. This program is only available for Consumers contracting for energy resources that do not include any allocation of coal-fired resources as required by OAR 860-038-0730. Prior to taking service under this program, Consumers must provide a signed affidavit to the Company representing that their energy supply will meet the requirements of OAR 860-038-0730 (1).

#### **Transmission**

Consumers electing service under this program must, either on its own, or through its ESS, reserve transmission capacity as an eligible transmission customer under the Company's OATT.

#### **Load Standard**

For at least one period of 12 consecutive months within the first 36 months of receiving service, the actual load of Consumer must meet or exceed 10 aMW (87,600 MWh or greater over 12 consecutive months). If the Consumer fails to meet this criteria, the Company may elect to deenroll the participant in the New Large Load Direct Access Program, unless the Consumer can prove that the shortfall in load is attributable to equipment failure, energy efficiency, load curtailment or load control or other causes outside of the Consumer's control. The Company will provide written notification to the Consumer and the Commission of its proposal to move the participant to the appropriate cost-of-service rate schedule due to failure to meet the load standard but will not switch a participant to a new rate structure before 90 days have passed since the written notification was provided. The Consumer may provide a written response to the Company and the Commission within 60 days of the notification to demonstrate that its failure to meet the load standard was due to one of the causes listed above.

(continued)

(N)



# NEW LARGE LOAD DIRECT ACCESS PROGRAM COST OF SERVICE OPT-OUT

Page 3

#### **Switch to Company Supply Service**

Consumers electing service under this program must give the Company not less than four years' notice to switch to Standard Offer Service or Cost-Based Service as described in Section VII of Rule 21 of this tariff. If a Consumer gives notice to switch within the initial five-years of service, the fees and adjustments contained in this schedule will continue to apply as applicable until supply service begins with the Company.

If a New Large Load Direct Access Program Consumer's switch to Standard Offer or Cost-Based Service will increase rates for existing cost-of-service Consumers by more than 0.5%, New Large Load Direct Access Program Consumers electing to switch to Standard Offer Service or Cost-Based Service will be subject to the forward-looking rate adder below for four years beginning from the date of the notice to return to Company Supply Service:

Company Supply Service Access Charge 0.000 cents/kWh

(N)

(N)

# LARGE GENERAL SERVICE 1,000 KW AND OVER DIRECT ACCESS DELIVERY SERVICE – DISTRIBUTION ONLY

Page 1

(N)

#### **Available**

In all territory served by the Company in the State of Oregon.

#### **Applicable**

This Schedule is applicable to Consumers who have chosen to receive electricity from an ESS, to electric service loads which have registered 1,000 kW or more, more than once in a preceding 18-month period and are participating in the New Large Load Direct Access Program in Schedule 293 or have completed the five-year transition period for the Five-Year Cost of Service Opt-Out in Schedule 296. This Schedule will remain applicable until Consumer fails to meet or exceed 1,000 kW for a subsequent period of 36 consecutive months. Deliveries at more than one point, or more than one voltage and phase classification, will be separately metered and billed. Service for intermittent, partial requirements, or highly fluctuating loads, or where service is seasonally disconnected during any one-year period will be provided only by special contract for such service.

### **Monthly Billing**

The Monthly Billing shall be the Distribution Charge plus the applicable adjustments as specified in Schedule 90.

Distribution Charge		<b>Delivery Vol</b>	tage
	Secondary	Primary	Transmission
Basic Charge			
Facility Capacity ≤ 4000 kW, per month	\$420.00	\$460.00	\$860.00
Facility Capacity > 4000 kW, per month	\$800.00	\$830.00	\$1,600.00
Facilities Charge			
≤ 4000 kW, per kW Facility Capacity	\$1.15	\$1.25	\$1.35
> 4000 kW, per kW Facility Capacity	\$1.10	\$1.15	\$1.35
On-Peak Demand Charge, per kW	\$3.74	\$3.17	\$3.61
Reactive Power Charge, per kvar	\$0.65	\$0.60	\$0.55

#### **Facility Capacity**

For determination of the Basic Charge and the Facilities Charge, the Facility Capacity shall be the average of the two greatest non-zero monthly demands established during the 12-month period which includes and ends with the current billing month.

#### Minimum Charge

The minimum monthly charge shall be the Basic Charge and the Facilities Charge. A higher minimum may be required by contract.

(N)

(continued)



# LARGE GENERAL SERVICE 1,000 KW AND OVER DIRECT ACCESS DELIVERY SERVICE – DISTRIBUTION ONLY

Page 2

(N)

#### **Reactive Power Charge**

The maximum 15-minute reactive demand for the month in kilovolt-amperes in excess of 40% of the maximum measured kilowatt demand for the same month.

#### **On-Peak Demand**

The kW shown by or computed from the readings of the Company's demand meter for the On-Peak 15-minute period of the Consumer's greatest use during the month, determined to the nearest kW. On-Peak hours are between 6:00 a.m. and 10:00 p.m. Monday through Saturday, excluding NERC holidays.

Due to the expansions of Daylight Saving Time (DST) as adopted under Section 110 of the U.S. Energy Policy Act of 2005, the time periods shown above will begin and end one hour later for the period between the second Sunday in March and the first Sunday in April and for the period between the last Sunday in October and the first Sunday in November. At such time as updated DST programming is available and has been applied to a Consumer meter, the time periods shown above will apply on all days for that Consumer. Consumers will be notified of their change to updated DST programming in a timely manner.

#### **Metering Adjustment**

For a Consumer receiving service at secondary delivery voltage where metering is at primary delivery shall have all billing quantities multiplied by an adjustment factor of 0.9718.

For a consumer receiving service at primary delivery voltage where metering is at secondary delivery voltage shall have all billing quantities multiplied by an adjustment factor of 1.0290.

#### **Transmission & Ancillary Services**

Consumers taking service under this schedule must also take service under the Company's FERC Open Access Transmission Tariff (OATT) or be served by an ESS or Scheduling ESS.

#### **Franchise Fees**

Franchise fees related to distribution charges are collected through distribution charges.

#### **Special Conditions**

Consumer shall not resell electric service received from Company under provisions of this Schedule to any person, except by permission of the Company or as otherwise expressly provided in Company tariffs.

#### **Term of Contract**

Company may require the Consumer to sign a written contract which shall have a term of not less than one year.

#### **Rules and Regulations**

Service under this Schedule is subject to the General Rules and Regulations contained in the tariff of which this Schedule is a part and to those prescribed by regulatory authorities.

(N)



#### SUMMARY OF EFFECTIVE RATE ADJUSTMENTS

Page 1

The following summarizes the applicability of the Company's adjustment schedules

#### **SUMMARY OF EFFECTIVE RATE ADJUSTMENTS**

Schedule	91	93	95	96	97	98*	192	196	197	199	202	203*	204	205	206	290	293	294*	295*	296*	297*	299	(N)
4	Х	Х	Х	Х	Χ	Х	Х	Х	Х	Х	Х	Х	Х	Х	Х	Х					Х	Х	
5	Х	Х	Х	Χ	Χ	Х	Х	Х	X	Х	Х	Χ	Χ	Х	Х	Х					Х	Х	
15	Χ	Χ	Χ	Χ		Х	Х	Х	Х	Х	Х	Χ	Χ	Х	Х	Х		Х			Х	Х	
23	Х	Χ	Χ	Χ		Х	Х	Х	Х	Х	Х	Х	Χ	Х	Х	Х		Х			Х	Х	
28	Χ	Х	Х	Χ		Х	Х	Х	Х	Х	Х	Χ	Χ	Х	Х	Χ		Х			Χ	Х	
30	Χ	Х	Х	Χ		Х	Х	Χ	Χ	Х	Х	Χ	Χ	Χ	Х	Х		Χ			Х	Χ	
41	Χ	Х	Х	Χ	Χ	Х	Х	Х	Х	Х	Х	Χ	Χ	Х	Х	Χ		Х			Χ	Х	
47	Х	Χ	Χ	Χ	Χ	Х	Х	Х	Х	Х	Х	Х	Χ	Х	Х	Х		Х			Х	Х	
48	Χ	Χ	Χ	Χ	Χ	Х	Х	Х	Х	Х	Х	Χ	Χ	Х	Х	Х		Х			Х	Х	
50	Х	Х	Х	Χ			Х	Х	X	Х	Х	Χ	Χ	Х	Х	Х		Χ			Х	Х	
51	Х	Х	Χ	Х			Х	Χ	Х	Х	Х	Χ	Χ	Х	Х	Х		Χ			Х	Χ	
52	Χ	Х	Х	Χ			Х	Х	Х	Х	Х	Χ	Χ	Х	Х	Χ		Х			Χ	Х	
53	Χ	Χ	Χ	Χ			Х	Х	X	Х	Х	Χ	Χ	Х	Х	Χ		Χ			Х	Х	
54	Χ	Χ	Χ	Χ			Х	Χ	Χ	Х	Х	Χ	Χ	Χ	Х	X		Χ			Х	Χ	
60																Χ							
723	Χ	Χ	Χ	Χ		Х	Х	Х	X	Х		Χ	Χ	Х	Х	Х		Χ			Х	X	
728	Χ	Х	Х	Χ		Х	Х	Х	Х	Х		Χ	Χ	Х	Х	Х		Χ			Х	Χ	
730	Х	Х	Х	Χ		Х	Х	Х	X	Х		Х	Χ	Х	Х	Х		Х	X	Х	Х	Х	
741	Х	Х	Х	Х	Χ	Х	Х	Х	Х	Х		Х	Χ	Х	Х	Х		Х			Х	Х	
747	Х	Х	Х	Х	Х	Х	Х	Х	Х	Х		Х	Χ	Х	Х	Х		Χ	Х	Х	Х	Х	
748	Х	Х	Х	Х	Χ	Х	Х	Х	Х	Х		Х	Χ	Х	Х	Х		Х	Х	Х	Х	Х	
751	Х	Χ	Х	Х			Х	Х	Х	Х		Х	Х	Х	Х	Х		X			Х	Х	
752	X	X	X	X			X	X	X	X		X	X	X	X	Х		X			X	X	
753 754	X	X	X	X			X	X	X	X		X	X	X	X	X		X			X	X	
754 949	X	Х	X	Х			Χ	Χ	Х	Х		Х	Х	Χ	Х	X	v	Х			Х	Х	
848	Х		Χ													Х	Х						(N)

<sup>\*</sup>Not applicable to all consumers. See Schedule for details.



#### LOW INCOME BILL PAYMENT ASSISTANCE FUND

Page 1

#### **Purpose**

The purpose of this Schedule is to collect funds for electric low-income bill payment assistance as specified in ORS 757.612 Section (7)(b).

#### **Applicable**

To all bills for electric service calculated under all tariffs and contracts.

#### **Adjustment Rates**

The applicable Adjustment Rates are listed below. Retail electricity Consumers shall not be required to pay more than \$500 per month per site for low-income electric bill payment assistance.

Schedule 4, 5	Adjustment Rate 69 cents per month
15, 23, 28, 30, 41, 47, 48, 50, 51, 52, 53, 54, 400, 723, 728, 730, 741, 747, 748, 751, 752, 753, 754, and 848	0.069 cents per kWh for the first 724,638 kWh

(N)

#### **Definition of Site** (Order No. 01-073 entered January 3, 2001)

"Site" means:

- (a) Buildings and related structures that are interconnected by facilities owned by a single retail electricity consumer and that are served through a single electric meter; or
- (b) A single contiguous area of land containing buildings or other structures that are separated by not more than 1,000 feet, such that:
  - i. Each building or structure included in the site is no more than 1,000 feet from at least one other building or structure in the site;
  - ii. Buildings and structures in the site, and land containing and connecting buildings and structures in the site, are owned by a single retail electricity consumer who is billed for electricity use at the buildings and structures; and
  - iii. Land shall be considered to be contiguous even if there is an intervening public or railroad right of way, provided that rights of way land, on which municipal infrastructure facilities exist (such as street lighting, sewerage transmission, and roadway controls), shall not be considered contiguous.

(continued)



# GENERAL RULES AND REGULATIONS DEFINITIONS

Page 2

(N)

(N)

**Definitions** (continued)

**Customer:** Any individual, partnership, corporation, firm, other organization or government agency who has applied for, been accepted and is currently receiving service from the Company at one location and at one point of delivery unless otherwise expressly provided in these rules, or in a rate schedule or contract. Any individual requesting service who has been a Customer within the last 20 days and voluntarily closed their account at the same or prior address. A Customer may not resell Electricity Services provided by the Company except as provided for in Company Tariffs.

Cost-Based Service: Has the meaning described in Rule 2, "Types of Service."

**Cost-of-Service Eligible Load:** as defined in OAR 860-038-0700, the load of a Consumer that is eligible for a cost-of-service rate.

**Date of Presentation:** The date upon which a bill is mailed, transmitted or delivered by the Company to the Consumer.

**Delivery Service:** Regulated distribution, transmission and related services provided using assets owned by the Company or its agent.

**Delivery Voltage:** Secondary Delivery Voltage is service delivery at less than the locally available distribution voltage, and is typically less than 11kV phase-phase. Primary Delivery Voltage is service delivery at the locally available distribution voltage, which is typically 11kV phase-phase or greater. Transmission Delivery Voltage is 60kV and greater (57kV locally in Portland).

**Demand:** The average rate in kilowatts at which electric energy is delivered during any period of time for specified length.

**Detented:** The condition of an electric meter which has a device installed to prevent reverse rotation or negative registration of the meter if electric current flows from Consumer's to Company's system.

Direct Access Consumer: A Consumer that purchases Electricity Services from an ESS.

Direct Access Service: Has the meaning described in Rule 2, "Types of Service."

**Duplicate Service Facilities:** Two services, including all associated distribution facilities, one duplicating part or all of the capacity of the other and providing a second possible path of supply of energy in the event of the failure of the first.

**Electric Service:** Electric power and energy at the point of delivery available for use by Consumer, irrespective of whether electric energy is actually utilized.

**Electricity:** Electric energy, measured in kilowatt-hours, or electric capacity measured in kilowatts, or both.

**Electricity Services:** Electricity distribution, transmission, generation or generation-related services.

**Electricity Service Supplier or "ESS":** A person or entity that offers to provide Electricity Services, certified by the Commission to provide such services, and meeting the requirements for service specified in Section IV of Rule 21. "Electricity Service Supplier" does not include the Company selling electricity to Consumers in its own service territory.

(continued)

Advice No. 18-010

Issued December 14, 2018
Etta Lockey, Vice President, Regulation

# GENERAL RULES AND REGULATIONS DEFINITIONS

Page 3

**Definitions** (continued)

Emergency Default Service: Has the meaning described in Rule 2, "Types of Service."

**Emergency Distribution Service:** Service in supply to, or made available to, load devices which are operated only in emergency situations or in testing for same. Such service contemplates frequency and intensity of operation reflective of emergency conditions and excludes service to freeze protection devices which operate in the coldest period of the year.

**Energy:** Electric energy, measured in kilowatt-hours.

**Extension:** A branch from, continuation of, or an increase in the capacity of an existing Company-owned transmission or distribution line. An extension may be either single-phase or three-phase or a conversion from a single-phase line to a three-phase line. An extension may also be the addition of, or increase in the capacity of other facilities.

**Intermittent Service:** Continuously available service which the Consumer uses intermittently and in such duration that minimal amounts of electric power or energy are registered by Company meters for such uses.

**Kilovar (kvar):** A unit of reactive power equal to 1,000 reactive volt-amperes.

**Kilovar-hour (Kvarh):** The amount of reactive flow in one hour, at a constant rate of one kilovar.

**Kilowatt (kW):** A unit of power equal to 1,000 watts.

**Kilowatt-hour (kWh):** The amount of energy delivered in one hour, when delivery is at a constant rate of one kilowatt.

**Large Nonresidential Consumer:** A Nonresidential Consumer that is not a Small Nonresidential Consumer.

**Load:** The amount of electricity delivered to or required by a Consumer.

NAICS Code: North American Industry Classification System Code.

**New Large Load:** as defined in OAR 860-038-0710, load associated with a new facility, an existing facility or an expansion of an existing facility, which: has never been contracted for or committed to in writing by a cost-of-service Consumer with an electric company, and is expected to result in a 10 average megawatt (aMW) or more increase in the Consumer's power requirements during the first three years after new operations begin.

**Nonresidential Consumer:** A retail electricity consumer that is not a Residential Consumer.

**Paralleling:** Connection by a Consumer of any source of electric power to Company's system or to a Consumer's system which is connected to Company's system.

(M)

(N)

(N)

(continued)



# GENERAL RULES AND REGULATIONS DEFINITIONS

Page 4

(M)

(M)

**Definitions** (continued)

**Partial Requirements Service:** Electric service in supply to, or made available to, a load which is partially or wholly served part of the time by another source, or which is partially served by another source. Partial Requirements Service includes forms of service defined herein as standby service or as supplementary service. In Partial Requirements Service the utility serves either or both of the kW difference and time difference between Consumer loads and the output of Consumer sources.

**Point of Delivery:** The location where the Company's service wires connect to the Consumer's wires or apparatus, unless the Company specifies otherwise.

**Portfolio:** A set of product and pricing rate options for electricity.

**Premises:** All of the real property and apparatus employed in a single enterprise on an integral parcel of land undivided, excepting in the case of industrial, agricultural, hospital, or university institutions, by a dedicated street, highway or other public thoroughfare, or railway. Automobile parking lots constituting a part of and adjacent to a single enterprise may be separated by an alley from the remainder of the premises served.

**Regulated Charges:** Charges for services subject to the jurisdiction of the Commission.

**Remote Service:** Service to distant or isolated locations which, in the Company's opinion, will not have sufficient annual Schedule Billings to cover the Company's annual incurred costs. A distant location is any location, or group of locations more than one-half mile from the Company's existing distribution facilities. An isolated location is one where additional development is unlikely due to geographical constraints, and may be less than one-half mile from existing distribution facilities.

**Residential Consumer:** A Consumer that resides at a dwelling served by the Company and primarily used for domestic purposes. "Residential consumer" does not include retail electricity consumers in a dwelling typically used for residency periods of less than 30 days, including hotels, motels, camps, lodges and clubs.

**Schedule Billing:** The total of all charges for service, computed from the Company's applicable rate schedules.

**Scheduling ESS:** An ESS or control area operator with responsibility for acquiring transmission services for a Consumer, forecasting on a daily basis the loads for which it has responsibility and providing daily schedules to the Company and settling imbalances, certified as such by the Commission and satisfying the requirements stated in Rule 21, Section V.

**Seasonal Service:** Service for annually recurring periods of use where service is discontinued or curtailed during part of the year.

**Service Election:** A Consumer's choice of types of service: Cost-Based Service, Direct Access Service, Portfolio Service, Standard Offer Service, or Emergency Default Service.

(M)

(continued)



# GENERAL RULES AND REGULATIONS DEFINITIONS

Page 5

**Definitions** (continued)

**Service Options:** Optional services that are part of Direct Access Service. Service Options include Billing Services and the purchase of Ancillary Services. Service Options do not include Service Elections or the choice of ESS.

(M)

**Service of Questionable Permanency:** Service for operations of a speculative character or the permanency of which has not been established. This will include, among others, service to mines, logging or associated woods operations, rock crushers or paving plants.

**Single Enterprises:** A separate business or other individual activity carried on by a Consumer. The term does not apply to associations or combinations of Consumers.

(M)

**Small Nonresidential Consumer:** A Nonresidential Consumer whose demand has not exceeded 30 kW more than once within the preceding 13 months or with seven months or less of service whose demand has not exceeded 30 kW.

Standard Offer Service: Has the meaning described in Rule 2, "Types of Service."

**Standby Service:** Service in supply to, or made available to, load which is served part or all of the time by another power source for reasons of increased reliability of supply through duplication of source.

**Supplementary Service:** Service in supply to, or made available to, load which receives some degree of simultaneous supply from another power source for additional supply or greater economy of supply at peak or light load conditions.

**Tract or Subdivision:** An area for dwellings which may be identified by filed subdivision plans or as an area in which a group of dwellings may be constructed about the same time, either by a large scale builder or by several builders working on a coordinated basis.

**Utility:** Pacific Power

# GENERAL RULES AND REGULATIONS DIRECT ACCESS

Page 6

(N)

(N)

### V. Scheduling ESS Service Requirements (continued)

- B. Requirements (continued)
  - 4. Maintain around-the-clock, seven-day-a-week dispatch facilities.
  - 5. Identify each of the Consumers which they are authorized to represent as a Scheduling ESS and confirm that the necessary metering requirements are met for the transmitting of information to the Company.

#### C. Suspension or Termination of Scheduling ESS Service

#### 1. Criteria

The Company may suspend or terminate a Scheduling ESS' contractual authorization to provide scheduling services for Direct Access Consumers in the Company's service area if:

- a. The Scheduling ESS has materially failed to meet its obligations under the terms of the Scheduling ESS Operating Agreement (including applicable tariffs) so as to constitute an event of default and the Company exercises a contractual right to terminate the agreement.
- b. The Scheduling ESS ceases to perform by failing to provide schedules when schedules are required.
- c. The Commission otherwise directs.

### 2. Appeal

If the Company suspends or terminates a Scheduling ESS' authorization to provide services because the Scheduling ESS materially failed to meet its obligations under the terms of the Scheduling ESS Operating Agreement, the Scheduling ESS' rights of appeal will be as specified in the Agreement. If the Company suspends or terminates the Scheduling ESS' authorization for any other reason, the Scheduling ESS has the right to appeal the decision to the Commission.

#### VI. Direct Access Service Election and Supplier Choice

#### A. Direct Access Service Request (DASR)

Election of Direct Access Service from an ESS requires a DASR. Changes in a Nonresidential Consumer's Service Election or ESS require a DASR. A Nonresidential Consumer may only elect or switch to Direct Access Service or change ESS if the new ESS submits a DASR as described in this Section. A DASR is submitted pursuant to the terms and conditions of the Company's ESS Service Agreement and this Rule. A DASR will be used to define the Competitive Electricity Services that the ESS is providing the Consumer.

(continued)



# GENERAL RULES AND REGULATIONS DIRECT ACCESS SERVICE ELECTION

Page 1

#### Service Election

Consumers wishing to change their Service Election from Cost-Based Service to Direct Access or Standard Offer Service must do so by submitting a written Change of Service Election Declaration (CSED) during an annual declaration window.

A CSED shall be in a form provided by the Company and shall be submitted either by FAX or e-mail.

If the Company receives multiple CSEDs during the annual declaration window as defined in OAR 860-038-270, the last CSED received will be implemented. Consumers may rescind a CSED during an annual declaration window.

The dates of the annual declaration window will be provided on the Company's web site and communicated to eligible customers through other means.

Company will post applicable Transition Adjustments on its web site at the commencement of the annual declaration window.

Company will post indicative transition adjustments 1 week and 2 months prior to the commencement of the annual declaration window. Indicative transition adjustments are estimates and are not used for the calculation of customer bills. Indicative transition adjustments are subject to change.

Consumers seeking service to New Large Load through the New Large Load Direct Access Program described in Schedule 293 must do so by submitting to the Company an official binding written notification of its intent to elect this program at the earlier of a binding written agreement with the Company for eligible new load or one year prior to the expected starting date of the incremental load. The notification requirement is waived for the eligible New Large Load Consumer that has entered into a written agreement with the Company prior to September 30, 2018 indicating its intent to receive distribution service from the Company and for which the Company has not planned to provide generation supply service.

(N)

(N)

### **CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of PacifiCorp's **Advice No. 18-010—Schedule 293—New Large Load Direct Access Program** on the parties listed below via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.

### Service List AR 614

IDALIO DOMED COMPANIV	de alcata @idah an ayyar aana
IDAHO POWER COMPANY	dockets@idahopower.com
JOHN CRIDER	john.crider@state.or.us
PUBLIC UTILITY COMMISSION OF OREGON	
BENJAMIN FITCH-FLEISCHMANN	bfitch@ecosystemrg.com
ECOSYSTEM RESEARCH GROUP, LLC	united Community and
MICHAEL GOETZ	mike@oregoncub.org
OREGON CITIZENS' UTILITY BOARD	hindren Oran market and
BEN INSKEEP	binskeep@eq-research.com
EQ-RESEARCH	
MATT LARKIN	mlarkin@idahopower.com
IDAHO POWER COMPANY	
JOHN LESLIE	john.leslie@dentons.com
DENTONS US LLP	
RICHARD LORENZ	rlorenz@cablehuston.com
CABLE HUSTON BENEDICT HAAGENSEN &	
LLOYD LLP	
MARCIE MILNER	marcie.milner@shell.com
SHELL ENERGY NORTH AMERICA, (US) L.P.	
LISA D NORDSTROM	Inordstrom@idahopower.com
IDAHO POWER COMPANY	
ROXANNE RESBUSIT	rrebusit@schwabe.com
PETER J RICHARDSON	peter@richardsonadams.com
RICHARDSON ADAMS, PLLC	
DOUGLAS C TINGEY	doug.tingey@pgn.com
PORTLAND GENERAL ELECTRIC	
ALLIANCE OF WESTERN ENERGY CONSUMER	S
RILEY G PECK	rgp@dvclaw.com
DAVISON VAN CLEVE, PC	
TYLER C PEPPLE	tcp@dvclaw.com
DAVISON VAN CLEVE, PC	
QTS REALTY TRUST INC	
TRAVIS WRIGHT	travis.wright@qtsdatacenters.com
QTS REALTY TRUST INC	
UM 1837	
PACIFICORP, DBA PACIFIC POWER	oregondockets@pacificorp.com
OREGON CITIZENS' UTILITY BOARD	dockets@oregoncub.org
GREGORY M. ADAMS	greg@richardsonadams.com
RICHARDSON ADAMS, PLLC	
GREG BASS	greg.bass@calpinesolutions.com
CALPINE ENERGY SOLUTIONS, LLC	

R BRYCE DALLEY	rbd@fb.com
FACEBOOK INC	1246612.55111
AMANDA DALTON	amanda@daltonadvocacy.com
DALTON ADVOCACY INC	amanaa@aanonaavooaoy.com
JOANIE DEUTSCH	jdeutsch@technet.org
TECHNET	Jucutson@teorniet.org
CARL FINK	cmfink@blueplanetlaw.com
BLUE PLANET ENERGY LAW LLC	ommik@bidopidriotidw.com
JACQUES GRANT	electric@yamservices.com
YAM SERVICES	olocaro@yarricorvicco.com
TROY GREENFIELD	tgreenfield@schwabe.com
SCHWABE WILLIAMSON & WYATT	igroomioid@conwabc.com
ROBERT JENKS	bob@oregoncub.org
OREGON CITIZENS' UTILITY BOARD	202@01090110421019
ROBERT D KAHN	rkahn@nippc.org
NORTHWEST & INTERMOUTAIN POWER	
PRODUCERS COALITION	
LANCE KAUFMAN	lance.kaufman@state.or.us
PUBLIC UTILITY COMMISSION OF OREGON	
JOHN LOWE	jravenesanmarcos@yahoo.com
RENEWABLE ENERGY COALITION	,
MATTHEW MCVEE	matthew.mcvee@pacificorp.com
PACIFICORP	
SOMMER MOSER	sommer.moser@doj.state.or.us
PUC STAFF - DEPARTMENT OF JUSTICE	
KEN NICHOLS	ken@eqlenergy.com
EQL ENERGY - JOINT DISTRIBUTED RESOURCE	
PARTIES	
WILLIAM J OHLE	wohle@schwabe.com
SCHWABE WILLIAMSON & WYATT	
JOCELYN C PEASE	jocelyn@mrg-law.com
MCDOWELL RACKNER GIBSON PC	
LISA F RACKNER	dockets@mrg-law.com
MCDOWELL RACKNER & GIBSON PC	
IRION A SANGER	irion@sanger-law.com
SANGER LAW PC	
BRIAN SKEAHAN	brian.skeahan@yahoo.com
CREA	
JAY TINKER	pge.opuc.filings@pgn.com
PORTLAND GENERAL ELECTRIC	
KELSEY WILSON	kelseyw@gallatinpa.com
GALLATIN PUBLIC AFFAIRS	

Dated this 14<sup>th</sup> day of December, 2018.

Katie Savarin

Coordinator, Regulatory Operations