

July 3, 2019

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

RE: Advice No. 19-14, 2019 Multi Year Opt-Out Window, Enrollment Period R

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes (ORS) 757.205 and 757.210 and Oregon Administrative Rules (OARs) 860-022-0025 and 860-022-0030 for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **September 1, 2019**:

Fourteenth Revision of Sheet No. 129-4 Sixth Revision of Sheet No. 129-6 Second Revision of Sheet No. 129-7

The purpose of this filing is to offer qualifying large nonresidential customers a three or five year cost of service opt-out beginning January 1, 2020 through an enrollment period during September 2019 (Enrollment Period R).

The cost of service opt-out implements the requirements of OAR 860-038-0275(5) to "offer customers a multi-year, direct access program with an associated fixed transition adjustment."

The Schedule 129 prices for Enrollment Period R are indicative only and will be revised in late August 2019 to be posted on the Company's public website and filed with the Commission on August 30, 2019 to reflect updated power costs using the methodology presented in this filing. Customers who choose Schedules 485, 489, 490, 491, 492 or 495 for service in 2020 will be subject to the applicable Schedule 129, Transition Adjustments. Customers served on the five-year term of service will have differing Schedule 129 transition adjustments from those customers served on the three-year term of service.

This is consistent with the provisions of the UE 262 Second Partial Stipulation that specified that for the five-year term, the initial Schedule 129 transition adjustments will reflect current Commission-approved fixed generation costs. These fixed generation costs will then be subject to update during the five-year term consistent with Commission orders related to general rate cases or Renewable Resource Automatic Adjustment Clause proceedings.

The UE 262 Second Partial Stipulation also specified that for the three-year term, the Schedule 129 transition adjustments will incorporate the revenue requirements of both existing and new resources, if any, expected to begin providing service to customers during the three-year period. Thus, in developing the three-year transition adjustments, PGE includes the projected revenue requirements for the Wheatridge Renewable Energy Facility, which is expected to be operational by in 2021.

The Schedule 129 transition adjustments are differentiated by schedule and delivery voltage in a manner consistent with the provisions of the UE 262 Second Partial Stipulation approved in OPUC Order 13-459. Development of these indicative Schedule 129 adjustment rates are provided in the attached work papers. The final posted adjustment rates will be developed in the same manner but updated for load forecast changes, power costs and forward market prices.

To satisfy the requirements of OARs 860-022-0025(2) and 860-022-0030(1), PGE provides the following responses:

OARs 860-022-0025 and 860-0022-0030 require that PGE submit a statement of the tariff schedule change, the number of customers affected, the change in revenue, and the grounds supporting the change. This filing proposes new prices to a limited number of eligible customers, all of whom may choose not to participate, therefore, it is unknown how many customers will make this election and the revenue change is unknown.

Please direct any questions regarding this filing to Colin Wright at (503) 464-8011.

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

Sincerely,

Karla Wenzel

Manager, Pricing and Tariffs

Enclosure(s)

SCHEDULE 129 (Continued)

TRANSITION COST ADJUSTMENT (Continued)

<u>Minimum Five Year Opt-Out</u>

For Enrollment Period Q (2018), the current Transition Cost Adjustments are:

Period	Sch. 485 Sec. Vol. ¢ per kWh	Sch. 485 Pri. Vol. ¢ per kWh	Sch. 489 Sec. Vol. ¢ per kWh	Sch. 489 Pri. Vol. ¢ per kWh	Sch. 489 Sub. Vol. ¢ per kWh	Sch. 490 Pri. Vol. ¢ per kWh	Schs. 491/492/495 ¢ per kWh
2019	2.972	2.958	2.625	2.576	2.493	2.540	2.511
2020	2.972	2.958	2.625	2.576	2.493	2.540	2.511
2021	2.972	2.958	2.625	2.576	2.493	2.540	2.511
2022	2.972	2.958	2.625	2.576	2.493	2.540	2.511
2023	2.972	2.958	2.625	2.576	2.493	2.540	2.511
After 2023	0.000	0.000	0.000	0.000	0.000	0.000	0.000

For Enrollment Period R (2019), the current Transition Cost Adjustments are:

Period	Sch. 485 Sec. Vol. ¢ per kWh	Sch. 485 Pri. Vol. ¢ per kWh	Sch. 489 Sec. Vol. ¢ per kWh	Sch. 489 Pri. Vol. ¢ per kWh	Sch. 489 Sub. Vol. ¢ per kWh	Sch. 490 Pri. Vol. ¢ per kWh	Schs. 491/492/495 ¢ per kWh
2020	2.069	2.065	1.741	1.708	1.613	1.663	1.754
2021	2.069	2.065	1.741	1.708	1.613	1.663	1.754
2022	2.069	2.065	1.741	1.708	1.613	1.663	1.754
2023	2.069	2.065	1.741	1.708	1.613	1.663	1.754
2024	2.069	2.065	1.741	1.708	1.613	1.663	1.754
After 2024	0.000	0.000	0.000	0.000	0.000	0.000	0.000

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SCHEDULE 129 (Continued)

TRANSITION COST ADJUSTMENT (Continued)

<u>Three Year Opt-Out</u>

For Enrollment Period P (2017), the Transition Cost Adjustment will be:

Period	Sch. 485 Sec. Vol.	Sch. 485 Pri. Vol.	Sch. 489 Sec. Vol.	Sch. 489 Pri. Vol.	Sch. 489 Sub. Vol.	Sch. 490 Pri. Vol.	Schs. 491/492/495
	¢ per kWh	¢ per kWh					
2018	3.277	3.193	2.941	2.886	2.907	2.688	2.797
2019	3.277	3.193	2.941	2.886	2.907	2.688	2.797
2020	3.277	3.193	2.941	2.886	2.907	2.688	2.797

For Enrollment Period Q (2018), the Transition Cost Adjustment will be:

Period	Sch. 485 Sec. Vol. ¢ per kWh	Sch. 485 Pri. Vol. ¢ per kWh	Sch. 489 Sec. Vol. ¢ per kWh	Sch. 489 Pri. Vol. ¢ per kWh	Sch. 489 Sub. Vol. ¢ per kWh	Sch. 490 Pri. Vol. ¢ per kWh	Schs. 491/492/495 ¢ per kWh
2019	3.082	3.024	2.723	2.673	2.686	2.416	2.645
2020	3.082	3.024	2.723	2.673	2.686	2.416	2.645
2021	3.082	3.024	2.723	2.673	2.686	2.416	2.645

For Enrollment Period R (2019), the Transition Cost Adjustment will be:

Period	Sch. 485 Sec. Vol.	Sch. 485 Pri. Vol.	Sch. 489 Sec. Vol.	Sch. 489 Pri. Vol.	Sch. 489 Sub. Vol.	Sch. 490 Pri. Vol.	Schs. 491/492/495
	¢ per kWh	¢ per kWh					
2020	2.103	2.055	1.744	1.711	1.734	1.474	1.745
2021	2.103	2.055	1.744	1.711	1.734	1.474	1.745
2022	2.103	2.055	1.744	1.711	1.734	1.474	1.745

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SCHEDULE 129 (Concluded)

SPECIAL CONDITIONS

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1. Annually, the total amount paid in Schedule 129 Long-Term Transition Cost Adjustments associated with Enrollment Periods A through K will be collected through applicable Large Nonresidential rate schedules (Schedules 75, 85, 89, 90, 485, 489, 490, 575, 585, 589 and 590), through either the System Usage or Distribution Charges. Commencing with Enrollment Period L, the Schedule 129 amounts paid or received will be collected from all rate schedules, through either System Usage Charges or Distribution Charges. Such adjustment to the System Usage or Distribution Charges will be made at the time the Company files final rates for Schedule 125, and will be effective on January 1st of the following calendar year.

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- 2. Annually, changes in fixed generation revenues resulting from either return to or departure from Cost of Service pricing by Schedules 485, 489, 490, 491, 492, and 495 customers relative to the Company's most recent general rate case will be incorporated into the System Usage Charges or Distribution Charges of all rate schedules. Such adjustment to the System Usage or Distribution Charges will be made at the time the Company files final rates for Schedule 125, and will be effective on January 1st of the following calendar year. The adjustment to the System Usage or Distribution Charges resulting from changes in fixed generation revenues shall not result in an overall rate increase or decrease of more than 2 percent except as noted below. For those Enrollment Periods in which the first-year Schedule 129 Transition Adjustments are expected to be positive charges to participants, the projected first-year revenues from Schedule 129 will be netted against the changes in fixed generation costs for purposes of calculating the proposed overall rate increase or decrease. Should the rate increase or decrease exceed 2 percent, the amounts exceeding 2 percent will be deferred for future recovery through a balancing account. This balancing account will be considered an "Automatic Adjustment Clause" as defined in ORS 757.210. For purposes of calculating the percent change in rates, Schedule 125 prices with and without the increased/decreased participating load will be determined.
- 3. In determining changes in fixed generation revenues from movement to or from Schedules 485, 489, 490, 491, 492, and 495, the following factors will be used:

	¢ per kWh
Secondary	3.640 3.575
Secondary	3.397
Primary	3.334
Subtransmission	3.289
	3.318
	3.183
	3.183
	3.183
	Primary Secondary Primary

TERM

The term of applicability under this schedule will correspond to a Customer's term of service under Schedules 485, 489, 490, 491, 492 or 495.