



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

August 12, 2021

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

**RE: Advice No. 21-21, Schedule 54 Large Nonresidential Renewable Energy
Certificates Rider Temporary Suspension of RECs**

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes (ORS) 757.205 and 757.210, and Oregon Administrative Rule (OAR) 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 18 with a requested effective date of **August 25, 2021**:

Sixth Revision of Sheet No. 54-1
Fifth Revision of Sheet No. 54-2

PGE is submitting this change to one of our competitive operation tariffs, Schedule 54, to effectuate an immediate suspension of PGE's Green Product Mix product offering for Renewable Energy Certificates (RECs) sales beyond those already committed under existing contracts. Schedule 54 offers Nonresidential Customers the option to purchase RECs at a stated price. While the REC market has been stable for several years, the market is experiencing significant price and supply volatility, exceeding the PGE's stated price of \$3.00 per REC. Because of the urgency to suspend the Green Product Mix offering, PGE is asking for expedited treatment of this filing and is accompanying the filing with an LSN.

During the ninety (90) day suspension period, PGE will be revising this tariff schedule to respond to changing market conditions, offer greater pricing flexibility, and also meet customer demand for a Clean Fuels Program compliant REC.

The second change PGE is submitting regards the specified resource offering and the prohibition against PGE's competitive operation offering RECs from generation facilities owned by investor-owned utilities or included in utility rate base. The original prohibition was intended to keep a bright line between PGE's generation to serve cost of service customers and is overbroad in its reach to all investor-owned utilities generation. It is not uncommon for investor-owned utilities to offer excess RECs on the market that are associated with owned generation. The competitive operation would like to have access to those RECs so long as they are not linked to PGE owned generation.

Attachment A provides a courtesy redline version of Schedule 54.

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

This filing does not increase, decrease, or otherwise change existing retail rates. This filing is temporarily suspending for ninety (90) days the PGE Green Resource Mix offering as the REC market is experiencing price and supply volatility.

Due to the requested effective date and the less than 30-day notice, PGE is also submitting an application requesting a waiver of legal statutory notice, pursuant to ORS 757.220 and OAR 860-022-0020.

Please direct any questions regarding this filing to Mary Widman at mary.widman@pgn.com. Please direct all formal correspondence and requests to the following email address pgc.opuc.filings@pgn.com

Sincerely,

\s\ Karla Wenzel

On behalf of
Robert Macfarlane
Manager, Pricing and Tariffs

Enclosures

cc: Scott Gibbens, OPUC

**SCHEDULE 54
LARGE NONRESIDENTIAL
RENEWABLE ENERGY CERTIFICATES RIDER**

PURPOSE

This rider is an optional supplemental service that supports the development of New Renewable Energy Resources as defined in ORS 757.600. Under this Schedule, a Large Nonresidential Customer may purchase Renewable Energy Certificates (RECs), subject to a minimum purchase.

AVAILABLE

In all territory served by the Company.

TEMPORARY SUSPENSION

The PGE Green Resource Mix offering is temporarily suspended for ninety (90) days from the effective date of this Tariff Sheet as the REC market is experiencing price and supply volatility. PGE is only suspending offering new RECs sales beyond those already committed under existing contracts.

(N)
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(N)

APPLICABLE

To all Customers taking service under any of the following PGE schedules: 38, 49, 83, 85, 89, 90, 91, 95, 485, 489, 490, 491, 495, 583, 585, 589, 590, 591, 595, and 689. Additionally, this Schedule is available to all competitive REC providers.

PRODUCT OFFERINGS

I. PGE Green Resource Mix

This product allows a customer to purchase RECs, subject to minimum purchase. The product is Green-e® Energy certified, and as a result all RECs purchased on behalf of Green Resource Mix Customers will conform to the Green-e® Renewable Energy Standard for Canada and the United States and are either registered with Western Renewable Energy Generation Information System (WREGIS) or provided via third party audited Green-e attestation.

II. Specified Resource

This product allows a customer to purchase RECs from a specified facility, subject to minimum a purchase. Specified Resource provides the participating customer with RECs obtained from specified resources and derived from the following fuels:

(M)

SCHEDULE 54 (Continued)

PRODUCT OFFERINGS

Specified Resource (Continued)

1. Wind;
2. Solar;
3. Certified low-impact hydroelectric;
4. Pipeline or irrigation hydroelectric systems;
5. Wave or tidal action;
6. Low emissions biomass (from digester methane from landfills, sewage or waste treatment plants, forest or field residues).
7. Hydrogen derived from photovoltaic electrolysis or non-hydrocarbon derivation process

(M)
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(M)

Upon customer request, PGE will assist the customer in identifying discrete generators matching the fuel types listed above. Any offering under Specified Resource must be 100% new renewable, which is defined as follows:

- (1) a) Placed in operation (generating electricity) on or after January 28, 2000;
b) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or
c) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000 such that the proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility.
- (2) Any project that has been subject to an uprate meant solely to increase generation at a facility – without the construction of a new or repowered, separately metered generating unit – is not eligible for the specified resource offering.

Generation facilities solely owned by PGE and constructed for the sole purpose of serving its cost-of-service utility customers are not eligible for selection in the specified resource program.

(C)
(C)

RATE

A Customer may purchase RECs through the PGE Green Resource Mix offering at:

0.3¢ per kWh

A minimum REC purchase of 1,000 kWh times 0.3¢ (\$3.00) per month, or annual equivalent, is required. For larger purchases, volume discounts may be available, subject to negotiation, pursuant to the execution of a written contract.

If a customer chooses to participate in the Specified Resource program, price will be based on the Specified Resource pricing and is subject to execution of a written contract.

(C)
(C)

Advice No. 21-21
Schedule 54 Large Nonresidential
Renewable Energy Certificates Rider
Attachment A
Courtesy redline version of Schedule 54

**SCHEDULE 54
LARGE NONRESIDENTIAL
RENEWABLE ENERGY CERTIFICATES RIDER**

PURPOSE

This rider is an optional supplemental service that supports the development of New Renewable Energy Resources as defined in ORS 757.600. Under this Schedule, a Large Nonresidential Customer may purchase Renewable Energy Certificates (RECs), subject to a minimum purchase.

AVAILABLE

In all territory served by the Company.

TEMPORARY SUSPENSION

The PGE Green Resource Mix offering is temporarily suspended for ninety (90) days from the effective date of this Tariff Sheet as the REC market is experiencing price and supply volatility. PGE is only suspending offering new RECs sales beyond those already committed under existing contracts.

APPLICABLE

To all Customers taking service under any of the following PGE schedules: 38, 49, 83, 85, 89, 90, 91, 95, 485, 489, 490, 491, 495, 583, 585, 589, 590, 591, 595, and 689. Additionally, this Schedule is available to all competitive REC providers.

PRODUCT OFFERINGS

I. PGE Green Resource Mix

This product allows a customer to purchase RECs, subject to minimum purchase. The product is Green-e® Energy certified, and as a result all RECs purchased on behalf of Green Resource Mix Customers will conform to the Green-e® Renewable Energy Standard for Canada and the United States and are either registered with Western Renewable Energy Generation Information System (WREGIS) or provided via third party audited Green-e attestation.

II. Specified Resource

This product allows a customer to purchase RECs from a specified facility, subject to minimum a purchase. Specified Resource provides the participating customer with RECs obtained from specified resources and derived from the following fuels:

- ~~1. Wind;~~
- ~~2. Solar;~~
- ~~3. Certified low-impact hydroelectric;~~
- ~~4. Pipeline or irrigation hydroelectric systems;~~
- ~~5. Wave or tidal action;~~
- ~~6. Low emissions biomass (from digester methane from landfills, sewage or waste treatment plants, forest or field residues);~~
- ~~7. Hydrogen derived from photovoltaic electrolysis or non-hydrocarbon derivation process~~

**Issued August 12, 2021
Brett Sims, Vice President**

**Effective for service
on and after August 25, 2021**

SCHEDULE 54 (Continued)

PRODUCT OFFERINGS

Specified Resource (Continued)

1. Wind;
2. Solar;
3. Certified low-impact hydroelectric;
4. Pipeline or irrigation hydroelectric systems;
5. Wave or tidal action;
6. Low emissions biomass (from digester methane from landfills, sewage or waste treatment plants, forest or field residues);
7. Hydrogen derived from photovoltaic electrolysis or non-hydrocarbon derivation process

Upon customer request, PGE will assist the customer in identifying discrete generators matching the fuel types listed above. Any offering under Specified Resource must be 100% new renewable, which is defined as follows:

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 - b) repowered on or after January 28, 2000 such that 80% of the fair market value of the project derives from new generation equipment installed as part of the repowering, or
 - c) a separable improvement to or enhancement of an operating existing facility that was first placed in operation prior to January 28, 2000 such that the proposed incremental generation is contractually available for sale and metered separately than existing generation at the facility.
- (2) Any project that has been subject to an uprate meant solely to increase generation at a facility – without the construction of a new or repowered, separately metered generating unit – is not eligible for the specified resource offering.

Generation facilities solely owned by ~~PGE an investor-owned utility (or included in the rate base of an investor-owned utility)~~ and constructed for the sole purpose of serving its cost-of-service utility customers are not eligible for selection in the specified resource program.

RATE

A Customer may purchase RECs through the PGE Green Resource Mix offering at:

0.3¢ per kWh

A minimum REC purchase of 1,000 kWh times 0.3¢ (\$3.00) per month, or annual equivalent, is required. For larger purchases, volume discounts may be available, subject to negotiation, pursuant to the execution of a written contract.

If a customer chooses to participate in the Specified Resource program, price will be based on the Specified Resource pricing~~may differ~~ and is subject to execution of a written contract.

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF _____) UTILITY L.S.N. APPLICATION
)
) NO. _____
 (UTILITY COMPANY)) (LEAVE BLANK)
)
 TO WAIVE STATUTORY NOTICE.)

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
PGE is submitting this change to one of our competitive operation tariffs, Schedule 54, to effectuate an immediate suspension of PGE's Green Product Mix product offering for Renewable Energy Certificates (RECs) sales beyond those already committed under existing contracts. Schedule 54 offers Nonresidential Customers the option to purchase RECs at a stated price. While the REC market has been stable for several years, the market is experiencing significant price and supply volatility, exceeding the PGE's stated price of \$3.00 per REC. Because of the urgency to suspend the Green Product Mix offering, PGE is asking for expedited treatment of this filing and is accompanying the filing with an LSN
2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)
Fifth Revision of Sheet No. 54-1
Fourth Revision of Sheet No. 54-2

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)
Sixth Revision of Sheet No. 54-1
Fifth Revision of Sheet No. 54-2

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

An immediate suspension of PGE's Green Product Mix product offering for Renewable Energy Certificates (RECs) sales beyond those already committed under existing contracts. Schedule 54 offers Nonresidential Customers the option to purchase RECs at a stated price. While the REC market has been stable for several years, the market is experiencing significant price and supply volatility, exceeding the PGE's stated price of \$3.00 per REC.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): August 25, 2021

AUTHORIZED SIGNATURE	TITLE /s/ Robert Macfarlane Manager, Pricing & Tariffs	DATE August 12, 2021
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE	DATE	