



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

August 24, 2017

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

Re: Advice No. 17-15 Schedule 54 Large Nonresidential Renewable Energy Certificates Rider (Competitive Operation)

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 **October 11, 2017**:

Third Revision of Sheet No. 54-1
Third Revision of Sheet No. 54-2
Original Sheet No. 54-3

The purpose of this filing is to update the language in Schedule 54, Large Nonresidential Renewable Energy Certificates Rider, and provide additional flexibility for qualifying nonresidential customers to contract with PGE to identify and have renewable energy certificates (RECs) purchased from a specified facility or fuel type on their behalf. This competitive operation offers customers two options: 1) to purchase unspecified RECs and 2) to purchase specified RECs. Providing customers with options offers additional choice and flexibility to customers, and may help attract and retain customers to this program.

As a competitive operation it is defined in OAR 860-038-0005(8). Schedule 54 was originally approved with PGE's filing of Advice No. 02-12. Even though it is a below the line service, PGE filed it as a tariffed Schedule as Staff, at the time, interpreted ORS 757.205 to require that all regulated and competitive services be tariffed.

There are other minor revisions included in the proposed Schedule 54 tariff that are housekeeping in nature. Attached is a redline version of Schedule 54 that includes PGE's proposed revisions.

To satisfy the requirements of OAR 860-022-0025, PGE responds as follows:

The proposed revisions to Schedule 54, Large Nonresidential Renewable Energy Certificates Rider, do not increase, decrease, otherwise change existing rates, or impact revenues. PGE has approximately 192 customers who choose to purchase under this Schedule.

Should you have any questions regarding this filing, please contact Jacob Goodspeed at (503) 464-7806.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Karla Wenzel". The signature is fluid and cursive, with the first name "Karla" being more prominent and the last name "Wenzel" following in a similar style.

Karla Wenzel
Manager, Pricing & Tariffs

**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) based on a percentage of the Customer's load, subject to a minimum purchase.

(D)

AVAILABLE

In all territory served by the Company.

APPLICABLE

To all Customers taking service under any of the following PGE schedules: 38, 49, 83, 85, 89, 90, 485, 489, 490, 491, 495, 583, 585, 589, 590, 591, and 595.

(C)
(C)

PRODUCT OFFERINGS

(N)

I. PGE Clean Wind (Commercial & Industrial)

This product allows a customer to purchase RECs based on a percentage of load, subject to minimum purchase. The product is Green-e certified, and as a result all RECs purchased on behalf of Clean Wind Customers will conform to Green-e Energy National Standards 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, based on a percentage of load, subject to minimum 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

(N)

SCHEDULE 54 (Continued)

PRODUCT OFFERINGS
Specified Resource (Continued)

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 an investor-owned utility (or included in the rate base of an investor-owned utility) and constructed for the purpose of serving cost-of-service utility customers are not eligible for selection in the specified resource program.

RATE

A Customer may purchase RECs through the PGE Clean Wind (C&I) offering at:

0.3¢ per kWh

A minimum REC purchase of 1,000 kWh times 0.3¢ (\$3.00) per month 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 may differ and is subject to execution of a written contract.

(T)

(N)

(N)

(C)

(N)

(N)

SCHEDULE 54 (Concluded)

SPECIAL CONDITIONS

1. The Customer may enroll to purchase Clean Wind RECs by signing a contract. Upon execution of a signed agreement, service will become effective with the next regularly scheduled meter reading date provided the Contract was entered into at least five days before their next scheduled meter read date. Absent the five-day notice, the change will become effective on the subsequent meter read date.
2. The Company will not accept enrollments from accounts with poor credit history. For the purposes of this offering, poor credit history is defined as: a) having received two or more final disconnect notices in the past 12 months; or b) having been involuntarily disconnected in the past 12 months.
3. The Company makes no representations as to the impact on the development of renewable resources from Customer participation.
4. The Company is not required to own renewables or to acquire energy from renewable resources simultaneously with Customer usage.
5. A REC purchase by the Company sufficient to meet the total of all Customer purchases of RECs will occur, at least, on an annual basis.
6. All incremental costs and revenues associated with the provision of services under this schedule will be appropriately charged or credited to nonutility accounts.
7. This product is offered through a competitive operation and is provided in accordance with the Code of Conduct as set forth in OAR 860-038-0500 through 860-038-0640.
8. If the Company chooses to use bill inserts to market this schedule to Customers, it will allow other REC providers access to place inserts in the Company's bills under the same prices, terms and conditions that apply to the Company's Large Nonresidential REC program.

(M)

(C)

(T)

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PGE Advice No. 17-15
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) based on a percentage of the Customer's load, subject to a minimum purchase. ~~This product is Green-e certified, and as a result all RECs purchased on behalf of Clean Wind Customers will conform to Green-e Energy National Standards and are either registered with Western Renewable Energy Generation Information System (WREGIS) or provided via third party audited Green-e attestation.~~

AVAILABLE

In all territory served by the Company.

APPLICABLE

To all ~~Large Nonresidential Customers~~ Customers taking service under any of the following PGE schedules: 38, 49, 83, 85, 89, 90, 485, 489, 490, 491, 495, 583, 585, 589, 590, 591, and 595.

PRODUCT OFFERINGS

I. PGE Clean Wind

This product allows a customer to purchase RECs based on a percentage of load, subject to minimum purchase. The product is Green-e certified, and as a result all RECs purchased on behalf of Clean Wind Customers will conform to Green-e Energy National Standards 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, based on a percentage of load, subject to minimum 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;
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5. Wave or tidal action;
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7. Hydrogen derived from photovoltaic electrolysis or non-hydrocarbon derivation process

SCHEDULE 54 (Continued)

PRODUCT OFFERINGS

Specified Resource (Continued)

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; ~~(2)~~

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 an investor-owned utility (or included in the rate base of an investor-owned utility) and constructed for the purpose of serving cost-of-service utility customers are not eligible for selection in the specified resource program.

RATE

A Customer may purchase RECs through the PGE Clean Wind (C&I) offering at:

0.3¢ per kWh

A minimum REC purchase of 1,000 kWh times 0.3¢ (\$3.00) per month 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 may differ and is subject to execution of a written contract.

SCHEDULE 54 (Concluded)

SPECIAL CONDITIONS

1. The Customer may enroll to purchase Clean Wind RECs by signing a contract ~~to pay annually or monthly~~. Upon execution of a signed agreement, service will become effective with the next regularly scheduled meter reading date provided the Contract was entered into at least five days before their next scheduled meter read date. Absent the five-day notice, the change will become effective on the subsequent meter read date.
2. The Company will not accept enrollments from accounts with poor credit history. For the purposes of this ~~rate-schedule offering~~, poor credit history is defined as: a) having received two or more final disconnect notices in the past 12 months; or b) having been involuntarily disconnected in the past 12 months.
3. The Company makes no representations as to the impact on the development of renewable resources from Customer participation.
4. The Company is not required to own renewables or to acquire energy from renewable resources simultaneously with Customer usage.
5. A REC purchase by the Company sufficient to meet the total of all Customer purchases of RECs will occur, at least, on an annual basis.
6. All incremental costs and revenues associated with the provision of services under this schedule will be appropriately charged or credited to nonutility accounts.
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8. If the Company chooses to use bill inserts to market this schedule to Customers, it will allow other REC providers access to place inserts in the Company's bills under the same prices, terms and conditions that apply to the Company's Large Nonresidential REC program.