



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

September 3, 2020

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

RE: Supplemental Filing of 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 (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. PGE initially filed Advice No. 20-22 on August 7, 2020 with a requested effective date of September 23, 2020, which remains as originally filed. PGE is submitting this Supplemental Filing to provide work papers supporting the revised proposal.

All sheets remain as previously filed.

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 (DA) priced at Cost of Service (COS). 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 DA priced at COS.

PGE's revised proposal has even impacts across various rate schedules in percentage terms. The revised proposal includes equitable impacts to both COS customers and DA customers. It also provides equitable impacts across the various rate schedules. The impacts to COS and DA, while not equal impacts in percentage terms due to PGE revenues only being based on Basic Charge, Distribution, and some transition adjustment revenues from DA customers, have a roughly equal impact when factoring in charges from the Electricity Service Supplier (ESS). In fact, the proposed prices are the same between equally situated COS and DA customers. The alternative approach allows DA customers to pay a very small amount both in terms of price and percentage impact of their total electricity bill (PGE plus ESS).

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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.

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 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@pqn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosures
cc: UE 380 and UM 2024 Service Lists

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
Portland General Electric Company) 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 initially filed Advice No. 20-22 on August 7, 2020 with a requested effective date of September 23, 2020, which remains as originally filed. PGE is submitting this Supplemental Filing to provide work papers supporting the revised proposal.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)
All sheets remain as previously filed.

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)
All sheets remain as previously filed.

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:
A Waiver of Statutory Notice is requested due to the requested effective date of September 23, 2020

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): September 23, 2020

AUTHORIZED SIGNATURE	TITLE s\ Robert Macfarlane Manager, Pricing & Tariffs	DATE September 3, 2020
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE	DATE	