

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 319

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision.

ORDER

DISPOSITION: SECOND PARTIAL STIPULATION ADOPTED

I. SUMMARY

In this order, we adopt the second partial stipulation, attached as Appendix A, to resolve the energy efficiency funding issue raised in this docket by Oregon Citizens' Utility Board (CUB).

The stipulating parties request we open a formal investigation into the funding of energy efficiency and the allocation of costs and benefits among rate classes. In the near term, they agree to increase the maximum allocation of public purpose charge funds dedicated to large customer energy efficiency programs. In consideration of this change, which shifts more energy efficiency funding to large customer programs, the stipulating parties agree to use the customer impact offset mechanism to provide a financial settlement to smaller customers.

We view the steps agreed to in the stipulation as a reasonable path forward out of the impasse on this issue. The stipulation provides a temporary solution to ensure continued pursuit of large customer programs without market disruption and calls for a Commission investigation to explore options for a more durable resolution. We clarify, however, that our adoption of the stipulation and consent to initiate an investigation, does not represent a conclusion that the most durable solution lies in ratemaking methods for quantifying the costs and benefits of energy efficiency, nor that we support any general prohibition of intervening legislative activity related to this issue.

II. PROCEDURAL HISTORY

On February 28, 2017, Portland General Electric Company (PGE) filed Advice No. 17-06

seeking a general increase in customer rates. We suspended the filing for investigation as authorized by ORS 757.215.¹ Separate procedural schedules were set for power cost issues and general rate case issues.

During the course of these proceedings, the parties filed three stipulations that resolve all disputed issues. First, the parties submitted a stipulation addressing all power cost issues. We adopted that stipulation on October 9, 2017, in Order No. 17-384.

Second, the parties submitted the first partial stipulation on September 18, 2017, to resolve all general rate case issues except CUB's energy efficiency funding issue. That stipulation is still pending and will be addressed in a separate order.

Third, the parties submitted the second partial stipulation, at issue in this order, addressing the energy efficiency funding issue.² Shortly after the filing of the stipulation, we granted a request to consider the second partial stipulation on an expedited basis in order to allow the Energy Trust of Oregon (Energy Trust) to appropriately budget for projects in 2018.

III. BACKGROUND

Three statutes comprise the statutory framework for energy efficiency programs administered by Energy Trust in PGE's service territory.

The first two relate to program funding. Senate Bill 1149, passed in 1999, requires electric companies to collect a three percent public purpose charge from all customers.³ Of the amount collected, 56.7 percent is designated for new cost-effective conservation and market transformation programs.⁴

Senate Bill 838, passed in 2007, allows collection of additional amounts from customers whose usage falls below one average megawatt annually (referred to hereafter as, "small customers") to fund or implement cost-effective energy conservation measures.⁵ Customers whose load is above this annual threshold (referred to hereafter as, "large customers") are exempt from any such additional charge, and are also prohibited from receiving any "direct benefit" from conservation measures implemented with this

¹ Order No. 17-074 (Mar 1, 2017) (suspending tariff filing for a period not to exceed nine months).

² The stipulating parties are: PGE; CUB; Industrial Customers of Northwest Utilities (ICNU); Fred Meyer Stores and Quality Food Centers, Division of The Kroger Co. (Kroger); and Staff. No other intervenor filed an objection. On October 9, 2017, PGE filed a motion to admit the second partial stipulation and the accompanying joint supporting testimony into the record. We grant that motion.

³ Oregon Laws 1999, Chapter 865, Section 3(3)(b)(A), codified in ORS 757.612.

⁴ Ten percent is allocated to schools, then 63 percent of the remaining 90 percent (*i.e.*, 57.6 percent of the total) is allocated to new cost-effective conservation and new market transformation. ORS 757.612(3)(b)(A) and (e)(A).

⁵ Oregon Laws 2007, Chapter 301, Section 46, codified in ORS 757.689.

funding. During the 2007 legislative session, stakeholders informally agreed to cap large customer expenditures at the level existing prior to enactment of the SB 838 energy efficiency funding mechanism.⁶ This was meant to alleviate concern that funding of small customer programs could be funded from money collected only from small customers pursuant to SB 838, and large customer programs could receive more of the SB 1149 public purpose charge dollars collected from all customers. Since 2007, Energy Trust has implemented this informal agreement, capping the amount of public purpose charge funds it allocates to large customer programs in PGE's service territory at 18.4 percent.

The third statute relates to acquisition of energy efficiency resources. Senate Bill 1547, passed in 2016, directs electric companies to “plan for and pursue all available energy efficiency resources that are cost effective, reliable, and feasible.”⁷ The legislature contemplated these investments would “produce cost-effective energy savings, reduce customer demand for energy, reduce overall electrical system costs, increase the public health and safety, and improve environmental benefits.”⁸

CUB identifies two difficulties in harmonizing these statutes. First, Energy Trust reports that it has reached the agreed upon 18.4 percent threshold for spending public purpose charge funds on large customer programs and will be unable to pursue additional cost-effective energy efficiency from large customer programs without exceeding that threshold.⁹ CUB reasons that, if Energy Trust has to curtail its large customer programs, it will not pursue *all* cost-effective energy efficiency as required by SB 1547.

Second, CUB believes that small customers are not receiving the full system benefits of the energy efficiency funded with SB 838 funds. To resolve this issue, CUB proposes that we adopt a mechanism to credit small customers with the value of energy efficiency purchased through SB 838. CUB identifies two approaches to this: a marginal cost approach and an embedded cost/rate credit approach. CUB allows that it may be appropriate to reconsider the informal cap on the allocation of public purpose charge (SB 1149) funds if its proposal for a credit is adopted.

CUB also raised this issue in PGE's 2014 general rate case, docket UE 283. There, parties asked that we open an investigation to consider whether large customers are

⁶ See Energy Trust Strategic Planning Workshop at 27 (Jun 7, 2013) https://www.energytrust.org/wp-content/uploads/2017/03/120607_Board_strategic_Planning_Workshop.pdf (discussing anticipated need to curtail spending for large customers in PGE's service territory in 2015 and explaining Energy Trust, Staff, PGE, PacifiCorp, CUB, and ICNU informally agreed upon passage of SB 838 that Energy Trust will keep funding for large-customer incentives at historic proportions; if large-customer incentives exceed pre-2007 level, Energy Trust would have two years to align these incentives with the historic allocation).

⁷ Oregon Laws 2016, Chapter 28, Section 19(3).

⁸ *Id.*

⁹ CUB/100, Jenks/7.

receiving a direct benefit from measures funded by SB 838, and whether changes to marginal cost study methodologies are in order. We opened docket UM 1713 to address this issue. Staff's last status report, dated February 9, 2016, indicates that several stakeholders agreed upon a legislative concept, which was drafted as a bill introduced in the 2016 Legislative Session.¹⁰ Ultimately, no bill was adopted that addresses this issue and no further activity has resumed in the docket.

IV. STIPULATION

The stipulating parties request that we open an investigation into the funding of energy efficiency and the allocation of costs and benefits among rate classes. To address near-term funding of large customer programs, they agree to increase the portion of SB 1149 public purpose charge funds that Energy Trust allocates to large customer energy efficiency programs, with an offsetting financial settlement to small customers. The stipulating parties agree to focus their attention and efforts on this investigation, and agree to limit their near-term ability to make related proposals in other Commission proceedings or to the legislature.

The stipulating parties believe their compromise results in an agreement that is in the public interest and will contribute to rates that are fair, just, and reasonable, consistent with ORS 756.040.

A. SB 1149 Public Purpose Charge Allocation; Financial Settlement

The stipulating parties agree that we should direct Energy Trust to raise the previously agreed upon cap on the allocation of public purpose charge funds to large customers in PGE's service territory from 18.4 percent to 20 percent.

In consideration of this greater allocation of public purpose charge (SB 1149) funds to large customer programs, the stipulating parties agree to a recurring \$777,315 annual settlement for small customers.¹¹ Using the customer impact offset (CIO) mechanism, customers on Schedule 7 (Residential Service) and Schedule 32 (Small Nonresidential Standard Service) will receive \$777,315 on an equal cents per kilowatt hour basis. In the partial stipulation resolving all other rate case issues (still pending adoption) the parties agree to keep open the option of revisiting the CIO for purposes of resolving the energy efficiency funding issue.¹²

¹⁰ 2016 Senate Bill 1509 (in committee upon adjournment).

¹¹ Although not specified in the stipulation, we interpret this term as an annual payment. The CIO is typically quantified on an annual basis and applied to the test year for rates. Over a period of three years, small customers would receive the equivalent of 3 x \$777,315, or \$2.3 million, from large energy users.

¹² Partial stipulation ¶ 30.h.

The cost of this CIO will be allocated to the following large customer schedules on an equal volumetric price basis:

Allocation	Schedule	Description
\$618,652	Schedule 89	Large Nonresidential Standard Service (>4,000 kW)
	Schedule 489	Large Nonresidential Cost-of-Service Opt-Out (>4,000 kW)
	Schedule 589	Large Nonresidential Direct Access Service (>4,000 kW)
\$154,663	Schedule 90	Large Nonresidential Standard Service (>4,000 kW and Aggregate to >100 MWa)
	Schedule 490	Large Nonresidential Cost-of-Service Opt-Out (>4,000 kW and Aggregate to >100 MWa)
	Schedule 590	Large Nonresidential Direct Access Service (>4,000 kW and Aggregate to >100 MWa)

B. Request for Investigation

To move toward a long-term resolution of this issue, the stipulating parties request that we open a contested-case investigation into the funding of energy efficiency and the allocation of costs and benefits among rate classes. They request the investigation also include evaluation of the sources and relative costs of energy efficiency “megaprojects” acquired by Energy Trust. They agree to an initiation date no earlier than six months following a final order resolving all issues in this docket.¹³

The stipulating parties agree that, to the extent our final order in the investigation modifies the allocation of costs and benefits of energy efficiency among rate classes, PGE will implement those changes in its next rate case. They clarify two points. First, if PGE has a rate case ongoing at the time of our order, no party will request to implement the order in that rate case. Second, if PGE files a rate case during our investigation, PGE will implement a CIO consistent with the terms of the second partial stipulation. In that case, PGE may propose an additional CIO for other reasons, but will not consider the costs and revenues of the energy efficiency CIO in determining whether to propose the additional CIO.

The stipulating parties agree that, while the investigation is ongoing, they will make no proposal to reallocate the costs and benefits of energy efficiency in any other Commission proceeding. They also agree to not propose any legislative changes to the manner in which energy efficiency is funded and its costs and benefits are allocated to customers for at least 12 months after the investigation is initiated. If a legislative change occurs during the investigation that materially alters the way in which the costs of energy

¹³ The partial stipulation remains under consideration. Accordingly, this order adopting the second partial stipulation is not the final order resolving all issues in this docket.

efficiency are allocated to and among customers, the second partial stipulation will terminate and PGE will make all filings necessary to eliminate the energy efficiency CIO.

In light of their request for a new investigation, the stipulating parties agree to close docket UM 1713, the investigation we opened following PGE's 2014 general rate case.

III. DISCUSSION

After reviewing the terms of the second partial stipulation and the information in the joint supporting testimony, we find the steps agreed to in the stipulation provide a reasonable path out of the impasse on this issue.

We find the stipulating parties' agreement to raise the informal cap on public purpose charge funding for large customers, together with the financial settlement for small customers, provides a reasonable temporary solution to address near-term funding for large customer programs. This adjustment allows for continued pursuit of all available cost-effective energy efficiency without market disruption while a long-term solution to program funding is explored. We interpret this stipulated term as an agreement among the stipulating parties to amend their previous informal agreement to the 18.4 percent cap and find all other terms of their original informal agreement carry forward.¹⁴

We agree to open an investigation into the funding of energy efficiency and the allocation of costs and benefits among rate classes. Despite some ambivalence about the resource commitment required, we accept that a formal investigation may help stakeholders reach a more durable agreement. To help us appropriately scope this investigation, we direct Staff to develop a detailed proposed scope for the investigation and present it to us at a public meeting, no earlier than six months following the final order resolving all issues in this docket. We expect to have a contested case phase of this docket, as the stipulation requests, but retain the flexibility to manage the phases and procedures used in this investigation as we find appropriate.

We note the cost-benefit allocation issues to be addressed as part of the investigation may not produce the optimal long-term resolution we seek. In particular, our adoption of the stipulation does not mean we view ratemaking methods to quantify the costs and benefits of energy efficiency as the most promising direction for resolution, nor that we commit to adopting such a method. To this point, we have not yet had the opportunity to address how the legislative directive in SB 1547 to "pursue all available energy efficiency resources that are cost effective, reliable, and feasible" practically harmonizes with the existing funding mechanisms for energy efficiency programs. We may ultimately find

¹⁴ Consistent with this interpretation, we decline to expressly "direct" Energy Trust to raise the informal cap to 20 percent, as requested in ¶ 8 of the second partial stipulation.

that legal interpretation or a legislative solution remains necessary to achieve the best long-term resolution.

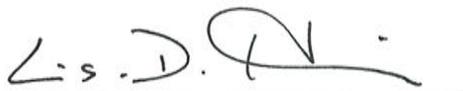
Finally, we note the stipulation includes an agreement among the stipulating parties to refrain from proposing legislative solutions for a period of time. Although we would not undertake to enforce this type of provision, we recognize that the parties agreed to this provision in settlement, presumably to focus their attention and resources on our investigation. We narrowly construe this limitation as a commitment among the stipulating parties that does not bind the Commission, applies only to initiating proposals, and lasts only for the first 12 months following the start of our investigation. We find that any broader interpretation of the terms of the stipulation would not be in the public interest.

IV. ORDER

IT IS ORDERED that:

1. The Second Partial Stipulation between Portland General Electric Company; Staff of the Public Utility Commission of Oregon; Oregon Citizens' Utility Board; the Industrial Customers of Northwest Utilities; and Fred Meyer Stores and Quality Food Centers, a Division of The Kroger Co., attached as Appendix A, is adopted.
2. Staff is directed to develop and present to the Commission at a public meeting a proposed scope for an investigation into the funding of energy efficiency and the allocation of costs and benefits among rate classes. Staff should make this presentation no earlier than six months following a final order resolving all issues in this docket.

Made, entered, and effective NOV 14 2017.



Lisa D. Hardie
Chair



Stephen M. Bloom
Commissioner




Megan W. Decker
Commissioner

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 319

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Request for a General Rate Revision.

PARTIAL STIPULATION

This Partial Stipulation ("Second Partial Stipulation") is between the Industrial Customers of Northwest Utilities ("ICNU"), the Oregon Citizens' Utility Board ("CUB"), Portland General Electric Company ("PGE"), Staff of the Public Utility Commission of Oregon ("Staff"), and Fred Meyer Stores and Quality Food Centers, Division of The Kroger Co. ("Kroger") (collectively, the "Stipulating Parties").

PGE filed this general rate case on February 28, 2017, seeking a 5.6% overall rate increase, which included a \$29.3 million reduction to PGE's net variable power costs ("NVPC"). Since that time, the parties to this docket have conducted extensive discovery, filed voluminous testimony, and engaged in a number of settlement discussions. Those settlement discussions resulted in a stipulation that resolved all NVPC issues and was filed in this docket on September 8, 2017 ("NVPC Stipulation"). No party opposed the NVPC Stipulation. Settlement discussions also resulted in a partial stipulation that resolved all revenue requirement issues and all but one rate spread and rate design issue ("First Partial Stipulation"). The First Partial Stipulation was filed in this docket on September 18, 2017 and also was unopposed by any party. Among the terms of the First Partial Stipulation, parties agreed to eliminate the Customer Impact Offset

("CIO"), except for lighting schedules, but to keep open the option of revisiting the CIO for purposes of resolving the remaining rate spread/rate design issue.¹

That remaining issue was proposed by CUB in its Opening Testimony, and refined in its Cross-Answering Testimony.² CUB proposed that customers with loads greater than one average megawatt ("1 aMW") pay a bill credit to customers under 1 aMW based on CUB's belief that customers under 1 aMW were not receiving the full system benefits of energy efficiency purchased pursuant to Senate Bill 838, which is funded exclusively by customers under 1 aMW ("CUB EE Issue"). Other parties filed testimony in response to the CUB EE Issue.³ After the parties agreed in principle to the issues addressed by the First Partial Stipulation, they held additional settlement discussions around the CUB EE Issue. As a result of those discussions, the Stipulating Parties have reached a compromise settlement of this last remaining issue in this docket pursuant to the following terms. Walmart Stores, Inc., and Calpine Energy Solutions, Inc. are also parties to this docket and have indicated that they do not oppose this Second Partial Stipulation. Small Business Utility Advocates, party to the docket, takes no position regarding this Second Partial Stipulation. The Stipulating Parties are aware of no other party to this docket that opposes this Second Partial Stipulation.

TERMS OF PARTIAL STIPULATION

1. In recognition of the CUB EE Issue, PGE shall reinstate the CIO, with customers on Schedules 7 and 32 receiving \$777,315 on an equal cents/KWh basis. The cost of this CIO shall be allocated among the following rate schedules and in the following manner:

¹ First Partial Stipulation ¶ 30.h.

² See CUB/100 and CUB/200.

³ See ICNU/400 and ICNU/500; Staff/1600, Staff/1700, and Staff/1900; PGE/2500; FM/200.

- a. \$618,652 shall be allocated to Schedules 89 and 489/589 on an equal volumetric price basis; and
 - b. \$154,663 shall be allocated to Schedules 90 and 490/590 on an equal volumetric price basis.
2. The Stipulating Parties request that, no earlier than six months following a final order resolving all issues in this docket, the Commission open an investigation into the funding of energy efficiency and the allocation of costs and benefits among rate classes. This investigation also shall include an evaluation of the sources and relative costs of energy efficiency “megaprojects” acquired by the Energy Trust of Oregon. The Stipulating Parties further request that this investigation be a contested case.
3. The Stipulating Parties agree that the Commission should close Docket No. UM 1713, Investigation into Large Customer Energy Efficiency.
4. To the extent the Commission’s final order in the investigation described in Paragraph 2, above, modifies the allocation of costs and benefits of energy efficiency among rate classes, PGE shall implement the Commission’s recommendation in its next rate case following such final order. If PGE has a rate case ongoing when the Commission issues a final order in the investigation described in Paragraph 2, neither PGE nor any other Stipulating Party will request to implement the Commission’s findings in that rate case.
5. If PGE files one or more rate cases during the pendency of the investigation described in Paragraph 2, above, it will implement a CIO consistent with the terms of Paragraph 1, above. This provision shall not prohibit PGE from proposing a CIO that is in addition to the CIO described in Paragraph 1 and is intended to limit the amount of a rate increase to one or more schedules; *provided that*, PGE shall not consider the costs and revenues of

the CIO described in Paragraph 1 when determining whether to propose an additional CIO.

6. While the investigation described in Paragraph 2 is ongoing, the Stipulating Parties agree that they will not make any proposal to reallocate the costs and/or benefits of energy efficiency in any other Commission proceeding. This provision does not preclude any Stipulating Party from generally discussing cost-effective energy efficiency in Integrated Resource Plan or other Commission dockets.
7. The Stipulating Parties agree that they will not propose any legislative changes to the manner in which energy efficiency is funded and its costs and benefits are allocated to customers for at least 12 months after the investigation described in Paragraph 2 is initiated. If a legislative change occurs during the pendency of this investigation that materially alters the way in which the costs of energy efficiency are allocated to and among customers, this Second Partial Stipulation shall automatically terminate and PGE shall make all filings necessary to immediately eliminate the CIO described in Paragraph 1, above.
8. The Stipulating Parties agree that the Commission should direct the Energy Trust of Oregon to immediately raise the 18.4% informal cap on public purpose charge funding for customers over 1 aMW in PGE's service territory to 20%.
9. The Stipulating Parties shall no longer be bound by the provisions of Paragraph 1 or Paragraph 8 once the Commission concludes the investigation described in Paragraph 2, unless PGE has a pending rate case, as described in Paragraph 5.
10. The Stipulating Parties recommend and request that the Commission approve the adjustments and provisions described herein as appropriate and reasonable resolutions of the identified issues in this Second Partial Stipulation.

11. The Stipulating Parties agree that this Second Partial Stipulation is in the public interest, and will contribute to rates that are fair, just and reasonable, consistent with the standard in ORS 756.040.
12. The Stipulating Parties agree that this Second Partial Stipulation represents a compromise in the positions of the Stipulating Parties. Without the written consent of all of the Stipulating Parties, evidence of conduct or statements, including but not limited to term sheets or other documents created solely for use in settlement conferences in this docket, are confidential and not admissible in the instant or any subsequent proceeding, unless independently discoverable or offered for other purposes allowed under ORS 40.190.
13. The Stipulating Parties have negotiated this Second Partial Stipulation as an integrated document. The Stipulating Parties, after consultation, may seek to obtain Commission approval of this Second Partial Stipulation prior to evidentiary hearings. If the Commission rejects all or any material part of this Second Partial Stipulation, or adds any material condition to any final order that is not consistent with this Second Partial Stipulation, each Stipulating Party reserves its right: (i) to withdraw from the Second Partial Stipulation, upon written notice to the Commission and the other Stipulating Parties within five (5) business days of service of the final order that rejects this Second Partial Stipulation, in whole or material part, or adds such material condition; (ii) pursuant to OAR 860-001-0350(9), to present evidence and argument on the record in support of the Second Partial Stipulation, including the right to cross-examine witnesses, introduce evidence as deemed appropriate to respond fully to issues presented, and raise issues that are incorporated in the settlements embodied in this Second Partial Stipulation; and (iii) pursuant to ORS 756.561 and OAR 860-001-0720, to seek rehearing or reconsideration, or pursuant to ORS 756.610 to appeal the Commission's final order.

Nothing in this paragraph provides any Stipulating Party the right to withdraw from this Second Partial Stipulation as a result of the Commission's resolution of issues that this Second Partial Stipulation does not resolve.

14. This Second Partial Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Second Partial Stipulation throughout this proceeding and in any appeal, and provide witnesses to support this Second Partial Stipulation (if specifically required by the Commission), and recommend that the Commission issue an order adopting the settlements contained herein. By entering into this Second Partial Stipulation, no Stipulating Party shall be deemed to have approved, admitted or consented to the facts, principles, methods or theories employed by any other Stipulating Party in arriving at the terms of this Second Partial Stipulation. Except as provided in this Second Partial Stipulation, no Stipulating Party shall be deemed to have agreed that any provision of this Second Partial Stipulation is appropriate for resolving issues in any other proceeding.
15. This Second Partial Stipulation may be signed in any number of counterparts, each of which will be an original for all purposes, but all of which taken together will constitute one and the same agreement.

ORDER NO. 17 466

DATED this 7th day of October, 2017.



PORTLAND GENERAL ELECTRIC
COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

OREGON CITIZENS' UTILITY BOARD

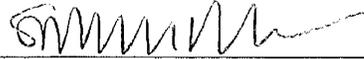
INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

THE KROGER CO.

ORDER NO. 17 466

DATED this 9th day of October, 2017.

PORTLAND GENERAL ELECTRIC
COMPANY



STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

OREGON CITIZENS' UTILITY BOARD

INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

THE KROGER CO.

ORDER NO. 17 466

DATED this _____ day of October, 2017.

PORTLAND GENERAL ELECTRIC
COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

A handwritten signature in black ink, appearing to read "E. J. ...", is written over a horizontal line.

OREGON CITIZENS' UTILITY BOARD

INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

THE KROGER CO.

ORDER NO. 17 406

DATED this 3rd day of October, 2017.

PORTLAND GENERAL ELECTRIC
COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

OREGON CITIZENS' UTILITY BOARD



INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

THE KROGER CO.

ORDER NO. 17 466

DATED this 6 day of October, 2017.

PORTLAND GENERAL ELECTRIC
COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

OREGON CITIZENS' UTILITY BOARD

INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES



THE KROGER CO.