



Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

November 24, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UE 391 – In the Matter of Portland General Electric Company, 2022 Annual Power Cost Update Tariff (Schedule 125)

Dear Filing Center:

Enclosed for filing the above-mentioned docket is Portland General Electric Company's Reply Comments to Alliance of Western Energy Consumers and the Oregon Citizens' Utility Board's Opposition to and Comments. The redacted version of this document is being filed by electronic mail with the filing center. An unredacted version will be sent to the filing center, via a zip file that is password protected, along with those who have signed General Protective Order No. 21-099.

Sincerely,

A handwritten signature in black ink that reads "Jaki Ferchland". The signature is written in a cursive, flowing style.

Jaki Ferchland
Manager, Revenue Requirements

JF: dm
Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 391

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2022 ANNUAL POWER COST UPDATE
TARIFF (SCHEDULE 125)

**PORTLAND GENERAL ELECTRIC
COMPANY'S REPLY COMMENTS TO
AWEC's AND CUB's OPPOSITION AND
COMMENTS**

I. Introduction

Portland General Electric Company (PGE or the Company) submits these comments in response to Oregon Citizens' Utility Board (CUB) and the Alliance of Western Energy Consumers (AWEC), opposition and comments to PGE's November 2021 Schedule 125 update filing. CUB and AWEC reviewed PGE's November 5¹ and November 15, 2021 Schedule 125 update filing and noted concerns regarding a certain power purchase agreement (PPA) and capacity contract.

II. PGE's response to CUB and AWEC's Opposition and Comments

A. Power Purchase Agreement

CUB and AWEC recommend reducing the 2022 Net Variable Power Cost forecast by [Begin Confidential] [REDACTED]

[End Confidential].

CUB and AWEC provided their recommendation on the basis that the [Begin Confidential] [REDACTED]

[End Confidential].

However, while CUB and AWEC are correct that the PPA includes such clauses, they did not take into consideration [Begin Confidential] [REDACTED]

¹ Please note, CUB and AWEC refer to this update as the November 1, 2021 Schedule 125 update filing.

[Redacted] [End Confidential].

When PGE finalized and filed the November 5, 2021 Schedule 125 update, the reasons for [Begin Confidential] [Redacted]

[Redacted] [End Confidential].

However, while PGE does not agree entirely with CUB and AWEC's reasoning and while there is still considerable uncertainty around the [Begin Confidential] [Redacted] [Redacted] [End Confidential], we do not oppose their recommendation and will adjust the 2022 NVPC forecast by the recommended amount for the purpose of resolving this matter. PGE will supplement Advice No. 21-41 to reflect this adjustment in the Schedule 125 prices.

B. Capacity Contracts

CUB and AWEC request that PGE provide more analysis and information on certain capacity contracts in the 2023 Annual Power Cost Update filing.

PGE does not oppose CUB and AWEC's request. PGE will provide additional information regarding the capacity contract referenced by CUB and AWEC that was included in the 2022 net variable power cost forecast and on similar contracts if PGE plans to include such in the next AUT filing. We do note, however, that PGE provided extensive testimony in this proceeding on why such capacity contracts are needed.³

² [Begin Confidential] [Redacted]

[End Confidential]

³ See PGE Exhibit 100, Section III.A.

III. Conclusion

PGE appreciates the opportunity to submit these comments in response to CUB and AWEC's November 19, 2021 opposition and comments to PGE's November 2021 Schedule 125 update filing. For the purpose of resolving the matters raised by CUB and AWEC, PGE does not oppose the parties' recommended adjustment to the 2022 net variable power cost update associated with **[Begin Confidential]** [REDACTED] **[End Confidential]** and their request that PGE provide additional information on the value of certain capacity contracts and the optimal time to buy that type of products in the 2023 Annual Power Cost Update filing.

Respectfully submitted this 24th day of November, 2021.



Jaki Ferchland
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