

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **STAFF'S MOTION TO AMEND ORDER NO. 98-191 (UM 918)**
4

5 **MOTION**

6 Pursuant to ORS 756.568, the staff of the Public Utility Commission of Oregon
7 (Commission) requests the Commission issue an order amending Order 98-191 (UM 918) to
8 approve revisions to the previously-approved "Service Quality Measures" agreement ("SQM
9 Agreement") involving provision of service by Pacific Power and Light ("PacifiCorp"). A clean
10 copy of the revised SQM Agreement is attached to this motion and marked as Exhibit A.

11 Staff is authorized to represent that PacifiCorp agrees to the SQM Agreement as revised.
12 Staff has also discussed the revisions with other parties who were previously involved with the
13 SQM Agreement. These other formerly-active parties are: Community Action Partnership of
14 Oregon (CAPO), Citizens' Utility Board of Oregon (CUB), and Industrial Customers of
15 Northwest Utilities (ICNU). Staff has not received objections to the proposed revisions from
16 CAPO, CUB or ICNU as a result of these discussions.

17 Staff asks the Commission to issue its order in this matter no later than December 1,
18 2010. This date will allow PacifiCorp to make the necessary changes to its programs to comply
19 with the revised SQM Agreement beginning in 2011.

20 **DISCUSSION**

21 The SQM Agreement was originally adopted by the Commission in 1998 for PacifiCorp.
22 *See* Order No. 98-191 (UM 918). The Commission has since approved several subsequent
23 revisions to various aspects of the SQM Agreement, most recently in 2004. *See* Exhibit A,
24 page 1.

25 Staff and PacifiCorp have been working together over the past year to revise the SQM
26 Agreement. The proposed revisions are necessary and also reflect the implementation of Oregon

1 Administrative Rules (OAR) Chapter 860, Divisions 024 and 028. These rules were not in place
2 when the SQM Agreement was originally established more than ten years ago.

3 Notable revisions to these measures contained in the revised SQM Agreement include the
4 following:

5 1) Revision of the safety performance measures (X measures) to align
6 with the adopted safety rules (OAR Chapter 860, Division 024) and pole
attachment rules (OAR Chapter 860, Division 028);

7 2) Elimination of the requirement for prior Commission approval to issue
8 a major safety violation (MSA) citation. More specifically, staff will no longer be
required to go before the Commission to begin this process, but will instead go
directly to the Administrative Hearings Division to initiate a proceeding; and

9 3) Establishment of a prescriptive process, via designated thresholds, to
10 determine major safety violations citations.

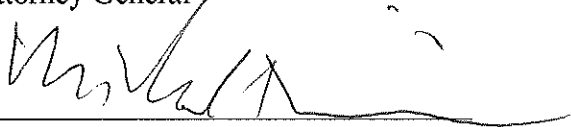
11 **CONCLUSION**

12 For the reasons stated, staff asks the Commission approve the attached revised SQM
13 Agreement.

14 DATED this 8 day of October 2010.

15 Respectfully submitted,

16 JOHN R. KROGER
17 Attorney General

18 
19 Michael T. Weirich, #82425
20 Assistant Attorney General
21 Of Attorneys for Staff of the Public Commission
22 of Oregon
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PP&L MASTER AGREEMENT THROUGH 2014

AFOR SQMs UE 94, Feb. 12, 1998, OPUC Order 98-191/ScottishPwr Merger Modifications UM 918, OPUC Order 99-616-June 16, 1999/UE 147 Term Extension (through 2014) OPUC Order 03-528.

Change 1: Dec. 14, 1999 Public Meeting - 3 items modified.

Change 2: July 1, 2003 Public Meeting – Reporting on Fiscal Year (4/1 through 3/31), also reasonable 10% improvements in SAIDI and SAIFI goals indicated.

Change 3: Dec. 7, 2004 Public Meeting – R4 Measure changed to CAIDI.

Change 4, Dec. ____, 2007

UM 918 REVISED STIPULATIONS FOR PACIFICORP SERVICE QUALITY MEASURES

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SERVICE QUALITY MEASURE STIPULATION

A. DEFINITIONS:

1. "Field review audit report", under Performance Measure S1, is a report that may apply to a small area or region of an operators' service territory, which may not be representative of the operators' entire service territory.
2. "Annual summary field audit report", under Performance Measure S1, means a PUC Staff compilation of the field review audit reports written by PUC Staff during a specific calendar year.
3. "Annual Report" means the annual report submitted by the Company prior to May 1 of each year that covers the service quality performance of the Company in the previous calendar year.
4. "Company" means PacifiCorp.
5. "Commission" or "PUC" means the Public Utility Commission of Oregon.
6. "Location" for the Vegetation Management Program is defined as a span of conductor(s) between any two poles including one of the immediately adjacent spans when interference is contiguous, but in no case it shall exceed two spans.
7. "Major Event" has the meaning provided in OAR 860-023-0080(9).
8. "Performance Measures." The nine (9) Performance Measures for evaluating service quality of the Company on an annual basis are as follows:
 1. C1....At Fault Customer Complaint Frequency
 2. R1....Average Customer Interruption Duration
 3. R2....Average Customer Interruption Frequency
 4. R3....Average Momentary Interruption Frequency
 5. R4 Annual Service Restoration Index
 6. S1.... Major Safety Violation

7. X1....Vegetation Management Program
8. X2....Pole and Overhead Facilities Inspection, Testing and Maintenance Program
9. X3...Substation Maintenance Programs

9. "Threshold Recommendation" means the report submitted to the Commission annually by the Company or Staff that contains recommended preferred threshold levels for the performance measures for the next year.

8. "Service Quality" or "SQ" means those aspects of energy delivery and customer service including, but not limited to, safety, reliability, operations, tariff compliance and customer relations.

10. "Staff" means PUC staff.

11. "Compliance Threshold", under Performance Measure S1, means one of the following:

- a. Detailed inspection cycle – Within an annual summary field audit report , Staff will compare their inspection results with those of the Company. If the Company fails to identify 50% or more of the violations identified by Staff, this failure may be considered to constitute a failure to meet the compliance threshold, or
- b. Vegetation Management – As addressed in an, annual summary field audit report, Staff discovers 300 or more locations in a 3,000 mile inspection of distribution and transmission lines, where vegetation interferes with the power lines this failure may be considered to constitute a failure to meet the compliance threshold, or
- c. Vegetation Management – As addressed in an annual summary field audit report, Staff discovers 100 or more locations in a 3,000 mile inspection of distribution and transmission lines, where readily climbable trees interfere with the power lines this failure may be considered to constitute a failure to meet the compliance threshold.

12. "Violation" means noncompliance with any rule contained in OAR 860, Division 024.

B. GENERAL:

1. The purpose of the Performance Measures is to provide a mechanism to ensure service quality is maintained at current or improved levels.
2. The Commission may impose revenue requirement reductions associated with Performance Measures C1, R1, R2, R3, R4, and S1 based upon the level of noncompliance by the Company. However, the Company should not incur revenue requirement reductions with proper system operation and maintenance.
3. For Performance Measures C1, R1, R2, R3, and R4, Company performance below Threshold Level 1 is the maximum measure value that is considered acceptable and not subject to revenue requirement reductions.
4. For Performance Measures C1, R1, R2, R3, and R4, for performance above Threshold Level 1 and below Threshold Level 2, the PUC may impose a revenue requirement reduction amount of up to \$100,000 per year.
5. For Performance Measures C1, R1, R2, R3, and R4, for performance at or above Threshold Level 2, the PUC may impose a revenue requirement reduction of up to \$1,000,000 per year.

C. COMPLIANCE:

These Performance Measures and associated agreements do not relieve the Company of its legal responsibilities to comply with PUC statutes, rules, or orders. Revenue requirement reduction actions associated with any Performance Measure discussed in this Stipulation do not preclude the Commission from pursuing any penalty, sanction or other remedy against the Company as allowed by law for the Company's failure to comply with PUC statutes, rules or orders.

D. RECORDS AND REPORTS:

1. For measures C1, R1, R2, R3, and R4, the Company and Staff shall meet prior to November 15 of each year to determine reasonable levels for setting Threshold Level 1 and Threshold Level 2 for the next year. If an agreement is reached, a joint Threshold

Recommendation shall go to the Commission recommending appropriate threshold levels. If the Company and Staff do not reach agreement, the Company and Staff may submit separate Recommendation Reports to the Commission for their determination of appropriate levels. The Threshold Recommendation(s) shall be submitted to the Commission prior to December 1.

2. The Company shall submit an Annual Report which documents each Performance Measure value and the revenue requirement reduction, if any, for the previous calendar year. The Annual Report shall be completed on forms and computerized spreadsheets prepared by the Company and approved by Staff. This report, along with supporting data and calculations on computer disks, shall be submitted to Staff annually prior to May 1 of each year for the preceding calendar year. The Annual Report shall explain historical and anticipated trends and events that have affected or will affect performance in the future.

3. The Annual Report shall address any Company procedural changes that affected the results of the Performance Measures or revenue requirement reductions during the preceding year.

4. The Company must audit the data and calculations used in determining the R1, R2, R3, and R4 Performance Measures to assure accuracy and compliance with OAR 860-023-0080 through 0160.

E. REVENUE REQUIREMENT REDUCTIONS:

1. Unless otherwise specified herein, the Company may incur a revenue requirement reduction for substandard performance associated with each Performance Measure. The revenue requirement reduction shall be determined using the criteria specified for each Performance Measure. The Company shall pay such revenue requirement reduction through rate reductions or other methods as deemed appropriate by the Commission.

2. Where there are extenuating circumstances that are clearly beyond the Company's control, the revenue requirement reductions may be capped or adjusted at the Commission's discretion, provided the Company is not found to be in violation of relevant PUC statutes or acceptable utility practice.

F. SPECIAL PROVISIONS:

1. The Commission may direct Staff, the Company or a qualified consultant to conduct special investigations including inspections, testing, audits, and other checks that the Commission deems necessary to assure that the Performance Measures and supporting data accurately reflect customer experiences and trends. The cost for such investigations and audits will be borne by the Company. In the event that such investigations reveal noncompliance with the provisions of this document, the Company shall make payment for the revenue requirement reduction variances found by the investigations plus interest at the company's authorized rate of return.

2. The Commission, after an opportunity for Company, Staff and public comment, may modify any service quality Performance Measure included in this Stipulation. Possible modifications include, but are not limited to, threshold levels, revenue requirement reductions, calculation methods, or reporting requirements.

G. TERM:

This agreement expires December 31, 2014.

H. SPECIFIC PERFORMANCE MEASURE AGREEMENTS

Performance Measure C1 -- Customer "At Fault" Complaint Frequency

1. **Description:** The C1 Performance Measure represents the annual total number of "at fault" complaints per 1,000 customers received by the PUC related to Company tariffs, policies, standards, and practices involving customer service issues.

2. **Definition:** An "at fault" complaint is a complaint designated a "COMPLAINT, COMPANY AT FAULT" consistent with current PUC Consumer Service Division practices. "At fault" complaints are identified as follows:

<u>Code</u>	<u>Customer Service Violation Description</u>
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- "R" A "R" violation involves a violation of an Oregon statute or a Commission rule.
- "T" A "T" violation involves a violation of the Company's approved tariffs and operating rules as filed with and approved by the PUC.
- "C" A "C" violation involves inappropriate and unacceptable customer treatment including, but not limited to, the following:
- Missed service/repair commitments without prior customer notification;
 - Unreasonable service or repair delays;
 - Unreasonable facility installation delays;
 - Incorrect, incomplete or misinformation provided to consumers, which is not rectified in a timely manner, resulting in customer inconvenience or material loss;
 - Unreasonable inaccessibility of the Company to customers;
 - Unreasonable delay in response to consumer inquiry.

If the Company and Staff disagree about an "at fault" designation for a complaint, Staff will submit the matter to its supervisors for review. If the Company still disagrees after Staff supervisory review, the Company may bring the matter to the Commission at a public meeting.

3. Data Source: PUC Consumer Services Division records and reports.

4. Performance Measure Calculation: The C1 Performance Measure is equal to the total number of Company "at fault" complaints handled by the PUC during the year, divided by the total average number of the Company's customers divided by 1,000; i.e., $X/Y/1000$. The number of customers shall be based on a year-end total of the Company's Oregon customers.

5. Threshold Levels for Performance Measure C1: The Commission will set the threshold levels annually based on recommendations presented by Staff and the Company at a public meeting.

6. Revenue Requirement Reductions: Revenue requirement reductions shall be assessed for any year that the Performance Measure is at or above the set number of "at fault" complaints per 1,000 customers. The revenue requirement reductions shall be determined by the Commission as shown below.

- a. Threshold Level 1 --\$100,000.00
- b. Threshold Level 2 --\$1,000,000.00

7. PUC Staff Responsibilities: Staff shall make the annual measure value mentioned in the data source (Item 3 above) available to the Company by May 1 of the following year.

Performance Measure R1 -- Average Customer Interruption Duration

1. Description: The R1 Performance Measure represents the weighted average of the last three years' system average interruption duration indices (SAIDI), exclusive of Major Events. The SAIDI is the sustained interruption time, in hours, that an average customer experiences during the year.

2. Data Source: Company's Annual Report (including reliability records, data, and certified reports).

3. Performance Measure Calculation: The R1 measure is a three-year weighted average of the SAIDI reliability indices experienced by the Company's customers. The weighted average is calculated by adding together the target calendar year at a 50 percent weighting factor, the preceding year at a 30 percent factor and the second preceding year at a 20 percent factor. This measure is subject to the requirements of OAR 860-023-0080 through 0160.

4. Threshold Levels for Performance Measure R1: The Commission will set the threshold levels annually based on recommendations presented by Staff and the Company

at a public meeting. Threshold levels 1 and 2 are specific number of hours for Performance Measure R1.

5. Revenue Requirement Reductions: Revenue Requirement Reductions shall be assessed for any year that the measure is at or above the Commission-assigned threshold levels. The Revenue Requirement Reductions shall be determined by the Commission based as shown below.

- a. Threshold Level 1 –\$100,000.00 per year
- b. Threshold Level 2 – \$1,000,000.00 per year.

6. Company Responsibilities: The Company shall furnish the actual R1 Performance Measure value mentioned in data source (Item 2 above) by May 1 of the following year.

Performance Measure R2 -- Average Customer Interruption Frequency

1. Description: The R2 Performance Measure represents the weighted average of the last three years' system average interruption frequency indices (SAIFI), exclusive of Major Events. The SAIFI index is the number of sustained interruptions that an average customer experiences during the year.

2. Data Source: Company's Annual Report (including Company records, data, and certified reports).

3. Performance Measure Calculation: The R2 Performance Measure is a three-year weighted average of the SAIFI reliability indices experienced by the Company's customers. The weighted average is calculated by adding together the target calendar year at a 50 percent weighting factor, the preceding year at a 30 percent factor and the second preceding year at a 20 percent factor. This Performance Measure is subject to the requirements of OAR 860-023-0080 through 0160.

4. Threshold Levels for Performance Measure R2: The Commission will set the threshold levels annually based on recommendations presented by Staff and the Company at a public meeting. Threshold levels 1 and 2 are specific number of sustained interruptions for Performance Measure R2.

5. Revenue Requirement Reductions: Revenue requirement reductions shall be assessed for any year that the Performance Measure is at or above the threshold levels. The revenue requirement reductions shall be determined by the Commission as shown below.

- a. Threshold Level 1 –\$100,000.00 per year.
- b. Threshold Level 2 –\$1,000,000.00 per year.

6. Company Responsibilities: The Company shall furnish the annual R2 Performance Measure mentioned in data source (item 2 above) by May 1 of the following year.

Performance Measure R3 -- Average Customer Momentary Interruption Frequency

1. Description: The R3 Performance Measure represents the weighted average of the last three years' momentary event Interruption frequency indices (MAIFIE), exclusive of Major Events. The MAIFIE index is the number of momentary Interruption events that an average customer experiences during the year.

2. Data Source: Company's Annual Report (including Company records, data, and certified reports).

3. Performance Measure Calculation: The R3 Performance Measure is a three-year weighted average of the MAIFIE reliability Indices experienced by the Company's customers. This average is calculated by adding together the target year at a 50 percent *weighting factor*, the *preceding year at a 30 percent factor*, and the *second preceding year at a 20 percent factor*. This Performance Measure is subject to the requirements of OAR 860-023-0080 through 0160.

4. Threshold Levels for Performance Measure R3: The Commission will set the threshold levels annually based on recommendations presented by Staff and the Company at a public meeting. The threshold levels 1 and 2 are specific number of momentary Interruption events for Performance Measure R3.

5. Revenue Requirement Reductions: Revenue requirement reductions shall be assessed for any year that the measure is at or above the threshold levels. The revenue requirement reductions shall be determined by the Commission as shown below:

- a. Threshold Level 1 –\$100,000.00 per year.
- b. Threshold Level 2 –\$1,000,000.00 per year.

6. Company Responsibilities: The Company shall furnish annual R3 Performance Measure value, as detailed in 2 and 3 above, by May 1 of the following year.

Performance Measure R4—Annual Service Restoration Index (Needs Review)

1. Description: The R4 Performance Measure represents the average time (hours) required to restore service to an average customer per sustained interruption, exclusive of Major Events. This is known as the Customer Average Interruption Duration Index (CAIDI).

2. Data Source: Company's Annual Report (including reliability records, data, and certified reports).

3. Performance Measure Calculation: The R4 Performance Measure is calculated each calendar year. R4 equals the annual SAIDI index divided by the annual SAIFI index. Major Events may be excluded by the Company. This measure is subject to the requirements of OAR 860-023-0080 through 0160.

4. Threshold Levels Performance Measure R4: The Commission will set the threshold levels annually based on recommendations presented by Staff and the Company at a public meeting. The threshold levels 1 and 2 are specific durations in hours for all customer sustained interruptions, on average, on an annual basis for Performance Measure R4.

5. Revenue Requirement Reductions: Revenue requirement reductions shall be assessed for any year that the Performance Measure is at or above the threshold levels.

The revenue requirement reductions shall be determined by the Commission as shown below.

- a. Threshold Level 1 –\$100,000.00 per year
- b. Threshold Level 2 – \$1,000,000.00 per year

6. Company Responsibilities: The Company shall furnish an annual R4 Performance Measure value mentioned in data source (item 2 above) by May 1 of the following year.

Performance Measure S1 – Major Safety Violation (MSV)

1. **Definition:** A "major safety violation" (MSV) includes any of the following circumstances:
 - a) The Company's failure to maintain adequate safety compliance programs, as determined by a recurrence of failure to meet compliance thresholds, from year to year, or by one or more compliance threshold when the compliance threshold is exceeded by a factor of 2, as reported in Staff's annual summary field audit report of the Company's operations; or
 - b) The Company's unresponsiveness to corrective measures identified in Staff's field review audit report of the Company's operations; or
 - c) The Company's failure to comply with OAR 860-024-0050
2. **Procedures:** Staff will issue the Company a copy of its field review audit report containing Staff's findings and any identified corrective measures as soon as it is completed. In the event Staff discovers during its annual summary field audit report that the Company has committed one or more MSV(s), Staff will first attempt to work with the company to resolve the MSV, and may, in its discretion, file a Complaint with the Commission to impose the appropriate revenue requirement reduction as delineated in paragraph 3 of this section. The Complaint will be processed in accordance with ORS 756.500 to ORS 756.610.

3. **Revenue Requirement Reduction:** Staff will recommend to the Commission that it impose a revenue requirement reduction for each MSV alleged in its Complaint as follows:
- a) If the Company can demonstrate to the Commission's satisfaction that the Company corrected each MSV alleged in the Complaint within the timeframe requested in Staff's field audit review report, Staff will recommend to the Commission that the Company set aside \$100,000 (for each MSV alleged) in revenues it has received from its customers for disposition by the Commission.
 - b) If the Company cannot demonstrate to the Commission's satisfaction that the Company has corrected each MSV alleged in the Complaint within the timeframe requested in Staff's field audit review report, Staff will recommend to the Commission that the Company set aside \$1,000,000 (for each MSV alleged) in revenues it has received from its customers for disposition by the Commission.
 - c) The Company and Staff recognize and agree it will not always be possible for the Company to correct a MSV within a specified period of time (e.g., a failure to maintain an adequate program of maintenance and correction as shown by a recurrence of failure to meet the compliance thresholds from year-to-year). For each such MSV, Staff will recommend the Commission set aside \$1,000,000 in revenues it has received from its customers for disposition by the Commission.

Reporting of X1, X2, X3, X4, X5, and X6 Programs

The Company and Staff will hold a yearly Maintenance Program Review Meeting by May 1. The Company will present to Staff, and include in the Annual Report, applicable information on each program's accomplishments for the year and plans for the next year. The Company shall provide quarterly updates on the X1 Performance Measure to Staff.

Performance Measure X1 - Vegetation Management Program

1. **Description:** The Vegetation Management Program is a Basic Maintenance Program that is set apart from the other inspection and maintenance programs due to the crucial effect trees can have on system safety and reliability. Trees and other vegetation are trimmed or removed to provide line clearance and prevent system damage. The

Vegetation Management personnel count is a valuable early warning indicator to alert Staff of the Company's ability to adequately maintain its system.

2. Understanding:

- a) The Company acknowledges that "tickling," "brushing" contacts, brown leaves, desiccation, or any other descriptions, or results of, direct or arcing contact with primary conductors is interpreted by Staff as interference.

- b) The Company will achieve and maintain full compliance with OAR 860-024-0016 as interpreted by PUC Staff.

3 Program Expenditures:

The Annual Report will contain information showing the Company's actual annual expenditures compared with its previously planned expenditures. Information will include total budget with actual vs budgeted for each of the following elements: Maintenance Cycle Trimming, Customer Assistance Trimming, Line Construction Trimming, and PacifiCorp supervision and administration.

4 Vegetation Management Personnel Information:

The Company's Annual Report shall include the number of full time employees assigned to the following positions for each of the last three years:

- a) Company foresters;
- b) Company tree trimmers and arborists;
- c) Contractor tree trimmers and arborists; and

2. Data Source: Company's records, data and reports.

Performance Measure X2 - Pole and Overhead Facilities Inspection, Testing and Maintenance Program

1. Description: This Performance Measure includes the inspection, testing and maintenance of all Company-owned distribution and transmission poles and overhead

distribution facilities. All Company-owned poles must be tested for residual fiber strength. Equipment attached to any pole must be inspected, repaired, or replaced to ensure the electrical system remains in good working order and meets the National Electric Safety Code (NESC).

2. Required Interval:

10-year cycle, 10% annually with no individual year falling below 8.5%.

3. PacifiCorp Quality Control:

Monthly inspection by appropriate random sample to ensure accuracy of the inspection. Minimum 5% of repair or replacement work is inspected as needed to ensure NESC compliance.

4. Program Expenditures:

Annual actual vs budgeted expenditures for the following:

- Pole and Overhead Facilities Inspection, Testing and Pole Treatment
- Repair and Replacement of Facilities.

Performance Measure X3 – Substation Maintenance Programs

1. Description: Substations are critical utility network facilities requiring more frequent inspections and testing of all its equipment. The Company will provide, at the annual meetings, information of its substations maintenance programs.

2. Program Interval

The program interval will be dictated by the substation equipment operational requirements.

3. Program Expenditures

Annual actual vs budgeted expenditures for all substations equipment maintenance programs.

1 **CERTIFICATE OF SERVICE**

2 I certify that on October 8, 2010, I served the foregoing MOTION upon the parties in this
3 proceeding by electronic mail and by sending a true, exact and full copy by regular mail, postage
4 prepaid, or by hand-delivery/shuttle, to the following:

5
6 **Community Action Partnership of Oregon**
7 Jess Kincaid
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9 PO Box 7964
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