



Portland General Electric Company
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July 18, 2008

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 2148
Salem OR 97308-2148

Re: UE 198

Attention Filing Center:

Enclosed for filing in the above-captioned docket are an original and one copy of:

- **STIPULATION REGARDING POWER COST ISSUES**

Also enclosed for filing are an original and five copies of:

- **JOINT EXPLANATORY BRIEF IN SUPPORT OF POWER COST STIPULATION**

These are being filed by electronic mail with the Filing Center.

An extra copy of the cover letter is enclosed. Please date stamp the extra copy of this letter and return it in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. C. Tingey", is written over a light-colored background.

DOUGLAS C. TINGEY
Assistant General Counsel

DCT:cbm
Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **STIPULATION REGARDING POWER COST ISSUES** and **JOINT EXPLANATORY BRIEF IN SUPPORT OF POWER COST STIPULATION** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UE 198.

Dated at Portland, Oregon, this 18th day of July, 2008.



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**SERVICE LIST
OPUC DOCKET # UE 198**

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

UE 198

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC COMPANY)	STIPULATION REGARDING OUTSTANDING POWER COST ISSUES
)	
Request for Net Variable Power Cost Revision)	

This Stipulation (“Stipulation”) is among Portland General Electric Company (“PGE”), Staff of the Public Utility Commission of Oregon (“Staff”), the Industrial Customers of Northwest Utilities (“ICNU”), and the Citizens’ Utility Board of Oregon (“CUB”) (collectively, the “Parties”). Capitalized terms used in this Stipulation have the meanings ascribed to them in this Stipulation.

On February 27, 2008, PGE filed a general rate case, assigned Docket No. UE 197. Part of that rate case was an update to PGE’s net variable power costs. On March 21, 2008, a prehearing conference was held in Docket No. UE 197. At that prehearing conference, Docket No. UE 197 was bifurcated, and Docket No. UE 198 was initiated to address all issues regarding PGE’s net variable power costs (“NVPC”). Re PGE, Docket Nos. UE 197/198, Joint Prehearing Conference Report at 2 (Mar. 24, 2008). A schedule was adopted for this Docket to provide for a Commission order in sufficient time for the November 15 direct access election window. Revised power cost rates resulting from this docket, and PGE’s general rate case, are to be implemented January 1, 2009.

The Parties held settlement conferences in this docket on June 10, 2008, June 17, 2008,

and June 19, 2008. Staff, CUB and ICNU raised various questions and issues regarding PGE's proposed NVPC that were addressed in the settlement conferences. As a result of those settlement discussions, the Parties are entering into this Stipulation to settle the outstanding issues in this Docket. Accordingly, the Parties request that the Commission adopt orders in this docket implementing the following:

STIPULATION

1. For the purpose of calculating forecast 2009 NVPC, PGE will make power cost update filings on July 11, 2008, September 26, 2008, November 3, 2008, and a final update on November 14, 2008. In each of those power cost updates, PGE will reflect the modeling changes and adjustments set forth below.

2. The projection for non-running station service ("NRSS") costs for the Colstrip plants will be removed from PGE's power cost model ("Monet") for 2009. NRSS for all other thermal generating plants will remain as originally filed in this docket. PGE will also modify the power cost modeling for its natural gas fired generating plants to reflect on/off peak cost differentials. The Parties further agree that, notwithstanding the requirements of Schedule 125, PGE can propose a modification for Colstrip NRSS in the 2010 Annual Update Tariff proceeding. PGE bears the burden of proof to show that such modifications are reasonable. Based on the April 1 filing in this docket, these changes will result in a reduction in NVPC of \$385,000. However, the final impact of this and other modeling changes will not be known until the final Monet run is filed in November 2008.

3. The estimate of the Boardman plant's heat rate used in Monet modeling for 2009 will be reduced by 75 btu/kwh to match the levels used in dockets UE 180 and UE 188. Based on the April 1 filing in this docket, this change will result in a reduction in NVPC of \$311,000.

However, the final impact of this and other modeling changes will not be known until the final Monet run is filed in November 2008.

4. The forecast of NVPC for 2009 will be reduced by \$240,000 to represent the impact of assuming a lower forced outage rate for the Beaver plant. This will be implemented as a line item reduction of NVPC in Monet; the forced outage rate input in Monet for Beaver will remain unchanged from the April 1 filing.

5. An assumed forecast of the NVPC benefits of the new Boardman simulator will be determined in the following manner: 6,876 MWh of Boardman generation will be multiplied by the spread between: 1) the flat Mid-C curve over the 10 month period Jan.-Mar. and June-Dec.; and 2) the Boardman variable cost per MWh for fuel and transportation. This will be implemented as a modeling change to Monet for 2009. However, the forced outage rate for Boardman will remain unchanged from the figure used in the April 1 filing. Based on the April 1 filing in this docket, this change will result in a reduction in NVPC of approximately \$400,000. In addition, the Parties agree that this adjustment will also be included in Monet for any applicable rate proceeding for 2010, whether a general rate case or an Annual Update Tariff proceeding. In doing so, the parties are not agreeing that all costs associated with the simulator are prudent and are not agreeing to any particular treatment of costs associated with the simulator.

6. Due to the ongoing study of PGE's wind integration costs, the day-ahead forecast component of wind integration costs for 2009 will be lowered from \$0.99/MWh to \$0.50/MWh. This will be implemented as a modification to a data input in Monet. The impact of this change is a reduction in NVPC of \$205,000.

7. PGE will reduce NVPC by \$1,220,000 in the Monet model for 2009 forecasting purposes to reflect the potential impact of shifting the timing of the Boardman planned

maintenance outage. This will be implemented as a line item reduction to NVPC in Monet.

8. In May 2008, PGE bought gas in Canada and resold it in the U.S., making a \$60,000 profit. PGE expected to perform similar sales in June 2008 but it is unclear whether any further opportunities will exist. PGE agrees, for purposes of settlement only, to include an amount of \$720,000 for 2009. This will be implemented as a line item reduction to NVPC in Monet.

9. PGE will include the extrinsic value adjustment for the Super Peak capacity contract determined by the Commission in docket UE 180. This will reduce NVPC by \$1,384,000.

10. The estimated total impact of the above described modifications is to reduce PGE's 2009 NVPC forecast by \$4,862,000 based on the April 1 filing in this docket. However, the final impact of this and other modeling changes will not be known until the final Monet run is filed in November 2008.

11. The Parties also agree to a list of minimum filing requirements ("MFRs") for PGE in future Annual Update Tariff and general rate case proceedings. The list is attached hereto as Exhibit A. The MFRs will be effective with PGE's September 26, 2008, update filing. In future years, PGE will make the MFRs available to the other Parties pursuant to a separate confidentiality agreement prior to the Commission's approval of a Protective Order. The confidentiality agreement will provide protections substantially similar to the Commission's standard protective order. The Parties further agree that if any of the Parties propose changes to the MFRs, the Parties will confer and work together in good faith to reach agreement on reasonable changes. The Parties do not anticipate that Commission permission will be necessary if the Parties agree on changes to the MFRs. If no agreement can be reached regarding proposed

changes to the MFRs, any Party may petition the Commission for an order allowing changes. Such a petition will not be considered a petition to modify this Stipulation.

12. The Parties further agree that the language changes proposed by PGE to Schedule 125 regarding updates to certain fixed coal transportation costs in an Annual Update Tariff filing, should be adopted. The remaining changes proposed by PGE to Schedule 125 will be addressed in Docket No. UE 197, and are not part of this Stipulation.

13. The Parties agree that this Stipulation is in the public interest and will produce rates that are fair, just and reasonable.

14. The Parties request that the Commission approve and adopt this Stipulation as an appropriate and reasonable resolution of the outstanding issues based on PGE's initial NVPC filing. The parties agree that additional issues related to NVPC based only on new information, such as new contracts or other changes to input data, may be raised in response to PGE's update filings.

15. This Stipulation represents a compromise of the Parties' positions and is a fair resolution of the issues raised given the potential outcomes in this Docket. The adjustment amounts in this Stipulation are for settlement purposes only and do not establish or imply any precedent. Further, no precedent is established or implied by any other aspect of or input assumption to Monet in this Docket. By signing this Stipulation, no Party agrees to or acknowledges whether the updates and modeling changes proposed in this Docket are consistent with Schedule 125 or previous agreements, and no party agrees to or acknowledges the prudence or imprudence of any disputed costs, inputs or modeling changes. The modeling changes and adjustments to NVPC specified herein apply only to PGE's 2009 forecasted NVPC, except for the modeling change described in paragraph 5 above, which will also be included in 2010 NVPC

forecasts.

16. The Parties agree that all testimony previously submitted in this matter dealing with NVPC issues may be admitted into the record.

17. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR § 860-14-0085. The Parties agree to support this Stipulation throughout this proceeding and in any appeal and recommend that the Commission issue an order implementing the terms of the Stipulation. The Parties also agree to cooperate in drafting and submitting the explanatory brief or written testimony required by OAR § 860-14-0085(4).

18. If this Stipulation is challenged by any other party to this proceeding, or any other party seeks a resolution of this docket that departs from the terms of this Stipulation, the Parties reserve the right to cross-examine witnesses and put in such evidence as they deem appropriate to respond fully to the issues presented. Notwithstanding this reservation of rights, the Stipulating Parties agree that they will continue to support the Commission's adoption of the terms of this Stipulation.

19. If the Commission rejects all or any material part of this Stipulation, or adds any material condition to any final order which is not contemplated by this Stipulation, each Party reserves the right to withdraw from this Stipulation upon written notice to the Commission and the other Parties within five (5) business days of service of the final order rejecting this Stipulation or adding such material condition.

20. This 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.

21. The Parties agree that this Stipulation represents a compromise in the positions of

the Parties. As such, conduct, statements, and documents disclosed in the negotiation of this Stipulation shall not be admissible as evidence in this or any other proceeding.

22. By entering into this Stipulation, no Party shall be deemed to have approved, admitted or consented to the facts, principles, methods or theories employed by any other Party in arriving at the terms of this Stipulation. Except as provided in this Stipulation, no Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving issues in any other proceeding.

DATED this 17th day of July, 2008

PORTLAND GENERAL ELECTRIC
COMPANY

/s/ DOUGLAS C. TINGEY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

/s/ STEPHANIE ANDRUS

CITIZENS' UTILITY BOARD OF
OREGON

/s/ BOB JENKS

INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

/s/ S. BRADLEY VAN CLEVE

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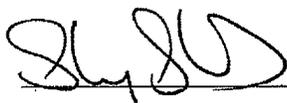
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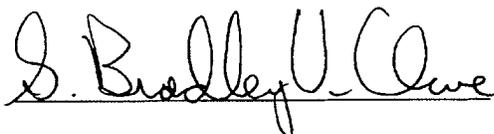
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Minimum Filing Requirements

July 7, 2008

General

The Minimum Filing Requirements (MFRs) define the documents to be provided by PGE in conjunction with the Net Variable Power Cost (NVPC) portion of the Company's initial (direct case) and update filings of its General Rate Case (GRC) and/or Annual Update Tariff (AUT) proceedings.

The term "Supporting Documents and Work Papers" as used here means the documents used by the persons doing the NVPC forecasting at PGE to develop the final inputs to Monet and the final modeling in Monet for each filing. This may include such items such as contracts, emails, white papers, studies, PGE computer programs, Excel spreadsheets, Word documents, pdf and text files. This will not include intermediate developmental versions of documents that are not used to support the final filing. Documents will be provided electronically where practical.

In cases where systems change or are replaced in the future, such as BookRunner, the MFRs will continue to provide substantially the same information as provided in PGE's 2009 GRC (UE-198).

PGE will take reasonable steps to ensure that the MFRs can be made available to CUB and ICNU at the time of the filing, rather than these parties having to wait for the OPUC to approve the protective order in the case.

Delivery Timing

In either an AUT year (April 1 initial filing) or a GRC year (Feb. 28 initial filing), at a minimum the following portion of the Direct Case Filing MFRs will be delivered with the initial filing:

- Summary Documents (Items 1-6)
- Modeling Enhancements and New Item Inputs (Item 14) – not applicable in AUT year
- Miscellaneous Item 15d - re: Testimony and Exhibits provided on the CD

The remainder of the Direct Case Filing MFRs will be delivered with the initial filing if practical, or no later than fifteen days after the filing (e.g. March 15 in a GRC year, April 15 in an AUT year).

For all update filings, Update Filing MFRs will be delivered with the update filing with the following exception. For the April 1 GRC Update Filing in a GRC year, the delivery of Item 23 will be made with the filing if practical, or no later than fifteen days after the filing (e.g. April 15).

Direct Case Filing

Applicability

- Applies to GRC Initial Filing (e.g. February 28) in a GRC year
- Applies to AUT Initial Filing (i.e. April 1) in a non-GRC year

Summary Documents

1. Monet model for the final step
2. Hourly Diagnostic Reports for the final step
3. Step Log showing NVPC effects of modeling enhancements, modeling changes, addition of new items or removal of items from the prior year rate proceeding (GRC or AUT), and other major updates that PGE believes the parties would want to see identified separately, such as updating the hydro study.
4. Output/Assumptions Summary Report comparable to that provided for the 2009 GRC
5. Executable files, any other files needed to run Monet, and installation instructions
6. Identification of the operating system PGE uses to operate Monet

Supporting Documents and Work Papers for the Following

7. Forward Curve Inputs. Consists of:
 - a. Electric curve extract from Trading Floor curve file
 - b. Gas curve extract from Trading Floor curve file
 - c. Canadian/US Foreign exchange rate (F/X Curve) from Risk Management
 - d. Model run for hourly shaping of monthly on/off-peak electric curve (Lydia Program)
 - e. Oil forward curve
8. Load Inputs. Consists of:
 - a. Monthly load forecast from Load Forecast Group
 - b. Hourly load forecast from Load Forecast Group
 - c. Copy of the loss study used by Load Forecast Group to develop busbar load forecast
9. Thermal Plant Inputs
 - a. Capacities
 - b. Heat Rates
 - c. Variable O&M

This includes any other cost or savings components modeled as part of Variable O&M, such as incremental transmission losses, SO₂ emission allowances (emission allowance \$/ton price forecast, plant emission factors lb/MMBtu), etc.
 - d. Forced outage rates
 - e. Maintenance outage schedules and derations
 - f. Minimum capacities
 - g. Operating constraints
 - h. Minimum up times
 - i. Minimum down times
 - j. Plant testing requirements
 - k. Oil usage volumes
 - l. Coal commodity costs
 - m. Coal transportation costs
 - n. Coal fixed fuel costs classified as NVPC items

Includes items such as: Colstrip Fixed Coal Cost and the following Boardman costs: Rail Car Mileage Tax, Coal Sampling, Rail Car Lease, Rail Car Maintenance, Trainset Storage Fee, and Coal Car Depreciation
10. Hydro Inputs
 - a. Monthly energy for all Hydro Resources

This will include the results of PGE's most current study using the Pacific Northwest Coordination Agreement (PNCA) Headwater Benefit Study. Note that this program is not the property of PGE and should be obtained from the Northwest Power Pool. Provide the PGE version of the PNCA model inputs, so that if the Parties obtain the PNCA model, they would have the inputs needed to reproduce PGE's study.
 - b. Description of logic for hourly shaping where applicable
 - c. Usable capacities where applicable
 - d. Operating constraints modeled
 - e. Hydro maintenance derations
 - f. Hydro forced outage rates (not currently modeled)
 - g. Hydro plant H/K factors
 - h. Spreadsheet demonstrating how the hydro energy final output from the PNCA study is adjusted to arrive at the monthly energy output on the PwrAEOOut sheet
11. Electric and Gas Contract Inputs
 - a. Copy of contract for each long-term (5-year or greater term) or non-standard power contract modeled in Monet.

For some contracts, this may consist of a term sheet rather than a full contract, depending on what was deemed reasonably necessary by the power modelers to model the contract in Monet.
 - b. BookRunner extracts for the test year of:
 - Electric Physical Contracts
 - Electric Financial Contracts
 - Gas Physical Contracts

Gas Financial Contracts

F/X Hedge Contracts

- c. Copy of each firm gas transportation or storage contract modeled in Monet
 - d. List of the PURPA QF contracts modeled in Monet
 - e. List of the long-term (5-year or greater term) or non-standard contracts modeled in MONET that were not included in PGE's most recent GRC or AUT.
 - f. Gas transportation input spreadsheet or its successor/equivalent
 - g. Website snapshots input to the gas transportation spreadsheet
 - h. Other Supporting Documents and Work Papers for contracts modeled in Monet, including any items showing on the Monet Cost and/or Energy Output reports not covered above. Could include structured contracts, option contracts, etc.
 - i. Coal contracts: Covered above under Thermal Plant Inputs
 - j. Amortizations of regulatory assets or liabilities modeled in the Contracts section of Monet
12. Wheeling Inputs
- a. Supporting Documents and Work Papers for all wheeling items modeled in Monet
13. Wind Power Inputs. Includes but not limited to:
- a. Monthly energy
 - b. Hourly energy
 - c. Maintenance
 - d. Forced outage rates
 - e. Integration costs, royalties, other costs and elements modeled
14. Modeling Enhancements and New Item Inputs
- a. Supporting Documents and Work Papers for all modeling enhancements and new items modeled in Monet.
 - b. Includes modeling or logic changes, changes to the methodology used to compute data inputs or other type of enhancement to the Monet model.
 - c. Modeling revisions, refinements, clean-ups etc. that do not affect NVPC under any conditions will not be considered to be modeling enhancements.
15. Miscellaneous
- a. Line Item Adjustments to Monet such as OPUC orders, settlement stipulations, others
 - b. Identification of all transactions modeled in Monet that do not produce energy
 - c. Items in Monet not covered elsewhere above
 - d. For all testimony and exhibits provided on the CD in pdf format, provide the testimony in searchable pdf format, and provide any exhibits created in Excel in the original Excel format when available to PGE.

Historical Operating Data

16. Hourly extract of data from PGE's Power Scheduling and Accounting System showing actual hourly energy values for the most recent Four-Year Calendar Period of the following:
- a. Generation from each coal, gas, hydro and wind generating plant modeled in Monet. Note that Colstrip Units 3 and 4 generation is aggregated in PGE's system, and the Mid-C contract generation is similarly aggregated.
 - b. Long-term (>5 years) electric contract purchases, sales and exchanges modeled in Monet.
17. Table showing the actual monthly generation of each PGE coal, gas, hydro and wind generating plant modeled in MONET, from the period 1998 through the last calendar year.
18. Monthly compilations of actual NVPC produced by PGE for the most recent calendar year.

Update Filings

19. Monet model for the final step
20. Hourly Diagnostic Reports for the final step
21. Step Log showing effect on NVPC of each update step since the last filing
22. Output/Assumptions Summary Report comparable to that provided for the 2009 GRC
23. For each Monet update step:
 - a. Text description of update, including identification and location of input changes within Monet.
 - b. Excel file containing Monet standard output reports (PwrCsOut, PwrAEOOut, PwrEnOut) and PC Input sheets.
 - c. Supporting Documents and Work Papers for the update step
24. For all testimony and exhibits provided on the CD in pdf format, provide the testimony in searchable pdf format, and provide any exhibits created in Excel in the original Excel format when available to PGE.