



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

September 9, 2009

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, Ste. 215
Salem OR, 97308-2148

Re: UE 208 Annual Update Tariff

Attention Filing Center:

Enclosed for filing the captioned docket are an original and five copies of:

- **Joint Testimony and Exhibit of Ed Durrenberger, Randall J. Falkenberg, Bob Jenks, and Jay Tinker (Staff-ICNU-CUB-PGE/100-101)**

An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided. Thank you in advance for your assistance.

Sincerely,

Patrick G. Hager
Manager, Regulatory Affairs

PGH/smg

cc: UE 208 Service List

Encl.

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

UE 208

**Annual Update Tariff
For Prices Effective January 1, 2010**

Staff-ICNU-CUB-PGE



Portland General Electric

September 9, 2009

Table of Contents

I. Introduction1

II. Adjustments4

III. Stipulation9

List of Exhibits10

I. Introduction

1 **Q. What are your names and positions?**

2 A. My name is Ed Durrenberger. I am a Senior Analyst employed by the Public Utility
3 Commission of Oregon (Commission). My qualifications have been provided in Staff
4 Exhibit 101.

5 My name is Randy Falkenberg. I am a consultant working for the Industrial Customers
6 of Northwest Utilities (ICNU) in this matter. My qualifications have been provided in
7 ICNU Exhibit 101.

8 My name is Bob Jenks. I am the Executive Director of the Citizens' Utility Board
9 (CUB). My qualifications have been provided in CUB Exhibit 101.

10 My name is Jay Tinker. I am a project manager for PGE. My qualifications were
11 previously provided in PGE Exhibit 100.

12 **Q. What is the purpose of your testimony?**

13 A. Our purpose is to describe and support a stipulation ("Stipulation") between Commission
14 Staff, ICNU, CUB, and PGE (the "Parties") regarding issues raised in this docket (UE 208).
15 The Stipulation also implements certain adjustments from the forced outage docket (Docket
16 No. UM 1355), and this testimony describes and supports the implementation of certain
17 PGE-related adjustments from Docket No. UM 1355. The Stipulation resolves all issues
18 identified by the Parties and, therefore, if approved by the Commission, would conclude this
19 proceeding.

20 **Q. Please describe the issues that were carried over from the stipulation in the Forced**
21 **Outage Rate (FOR) Docket UM 1355.**

1 A. The three issues that were carried over from the UM 1355 stipulation are the Forced Outage
2 Rate Collar (FOR Collar), high-load and low-load hour outage rate split (HLH and LLH
3 split), and the Beaver equivalent forced outage rate when the plant is in demand (Beaver
4 EFORD). Through workshops and settlement discussions in UM 1355, Parties reached
5 agreement, in general, on these three issues. Though the Commission may not yet have
6 issued its Order in UM 1355, PGE will implement these changes in this docket (UE 208).
7 Also, PGE will share its analysis as appropriate.

8 **Q. Was the Planned Maintenance Outage (PMO) methodology issue in UM 1355 also**
9 **carried over into this docket?**

10 A. Yes. The PMO methodology was discussed among the Parties during settlement discussions
11 in both UM 1355 and UE 208. In UE 208 direct testimony, some Parties raised issues about
12 the PMO methodology. CUB and PGE were able to resolve CUB's concern about Parties
13 having an opportunity to comment on updates to the PMO schedule. PGE will continue to
14 forecast PMO as it has in the past and will include both methodologies in the MFRs. This is
15 discussed in more detail below.

16 **Q. Were there any remaining issues?**

17 A. Yes. Those two issues are how the FOR will be calculated for new plants and for new
18 capital investments.

19 **Q. How will the FOR be calculated for a new plant with no operational history?**

20 A. Parties agree that this issue is best addressed on a case-by-case basis while taking into
21 consideration differences by utility and plant type. However, PGE will use an estimated
22 FOR based on current available sources (e.g., the vendor, contract, manufacturer, and NERC
23 GADS) as it has for the Port Westward plant for the first two years. Then as plant operating
24 data becomes available, the operating data will be used in conjunction with the estimated

1 FOR and weighted accordingly. After the plant has accumulated four years of plant data,
2 the four-year rolling average FOR will be calculated.

3 **Q. How will the FOR be calculated for new capital investments?**

4 A. Parties agree that this issue is best addressed on a case-by-case basis. Parties may propose
5 an adjustment in the FOR, either a decrease or increase, if they can establish that a specific
6 capital investment will result in a change in unit availability. The FOR would be adjusted
7 on a going forward basis and will avoid double-counting of the actual increase or decrease.

8 **Q. Please summarize the UE 208 Stipulation.**

9 A. The Stipulation resolves identified issues that impact net variable power costs (NVPC) for
10 the 2010 AUT including forced outage rate issues carried over from UM 1355. A copy of
11 the Stipulation is attached as Exhibit 101.

II. Adjustments

1 **Q. Please describe the first adjustment to the 2010 Test Year NVPC implementing the**
2 **FOR Collar Adjustment.**

3 A. The Parties believe that, in general, the four-year average continues to be the best method to
4 forecast forced outages rates. However, the Parties also believe that actual forced outage
5 results outside of a range of outcomes experienced nationally by thermal plants of the same
6 fuel type and general size may not be indicative of future forced outage performance.
7 Therefore, the Parties agreed to use NERC data to “collar” the actual results of Boardman
8 and Colstrip.

9 Parties agreed that the FOR collar method results in an acceptable proxy for a unit’s
10 FOR, should that unit’s annual FOR fall outside the 10th or 90th percentile of comparable
11 NERC coal units. The percentiles will be based on the distribution of the merged NERC
12 data for the most recently available four-year period. Parties agree that this methodology
13 does not imply “imprudence” nor “prudence” and it is not intended to be used in the future
14 to determine imprudence or prudence.

15 PGE anticipates that it will be able to implement this change to Monet in time for the
16 September 29, 2009 update in UE 208. In the alternative, PGE will implement this change
17 no later than the final Monet update in UE 208, scheduled for November 16, 2009.

18 In future proceedings, PGE will apply the FOR Collar. In the 2011 test year, the
19 Boardman and Colstrip 2009 EFOR will be collared by 2005-2008 NERC data. The collars
20 for the previous years will remain the same as in UE 208, that is, they will remain frozen
21 and not be updated in the future as shown in Table 1 below.

Table 1

Forced Outage Rate Year	NERC Data Used for Collar
2005	2001-2004
2006	2002-2005
2007	2003-2006
2008	2004-2007
2009	2005-2008

1 Last, the Parties agree that should the NERC sample change significantly, the efficacy
2 of the Collar should be revisited.

3 **Q. Please describe the second adjustment to the 2010 Test Year NVPC implementing the**
4 **HLH and LLH outage rate split.**

5 A. During UM 1355, ICNU, Staff, and CUB raised the issue of whether plant deferrable
6 maintenance outages are more likely to occur during high-load or low-load hours and if
7 separate maintenance outage rates (MORs) for HLH and LLH should be modeled. After
8 PGE conducted its own analysis, Parties agreed in the UM 1355 settlement discussions to
9 include an estimate of the NVPC effect of Boardman's and Colstrip's high-load and low-
10 load MOR split as an outboard calculation in an update filing in UE 208. For future AUTs,
11 PGE will similarly include a NVPC estimate as an outboard calculation with the initial
12 filing. To minimize the resources required, after the initial filing, no further updates to the
13 outboard calculation will be made. However, PGE agreed to work with Parties to
14 incorporate this enhancement into Monet but until it does so, PGE will use the outboard
15 calculation.

16 For the UE 208 September 29th Filing, PGE expects to provide the outboard calculation
17 for the effect of the MOR split for the Boardman and Colstrip plants. In the alternative,
18 PGE will implement this change no later than the final Monet update in UE 208, scheduled
19 for November 16, 2009.

1 **Q. Please describe the third adjustment to the 2010 Test Year NVPC implementing the**
2 **Beaver EFORD methodology.**

3 A. The EFORD methodology is a formula that is intended to calculate what the forced outage
4 rate is when the plant is in demand. This type of methodology generally applies to a simple-
5 cycle peaker plant. However, PGE's Beaver Plant Units 1-7 are a combined-cycle gas plant.
6 Parties agree that the standard NERC EFORD formula is not directly applicable to Beaver
7 Units 1-7 in their current configuration and operation, and agree that a proxy should be used.
8 Parties agree that the proxy formula will be to remove the forced maintenance hours from
9 the derivation of the FOR. Parties also agree that the calculation for Beaver Unit 8 will be
10 modified similar to Units 1-7. Last, Parties agree that the formula will be revisited in the
11 event the Beaver plant operations change significantly.

12 PGE is continuing to work on the implementation and the figures below should be
13 considered preliminary. PGE will work with the Parties as it develops the implementation
14 of this change. PGE anticipates that it will be able to implement this change to Monet in
15 time for the September 29, 2009 update in UE 208. In the alternative, PGE will implement
16 this change no later than the final Monet update in UE 208, scheduled for November 16,
17 2009.

18 In PGE's July 10th AUT Update filing, Beaver's Unit 1-7 FOR was 24.6% and Beaver
19 Unit 8 was 36.4%. PGE expects Beaver Units 1-7 and Unit 8 EFORD proxy to be
20 approximately 10%-11% in its September Update Filing.

21 **Q. Please describe the fourth adjustment for the \$1 million Stipulated amount for PMO.**

22 A. As part of the settlement in this docket, PGE will use its forecast for PMOs but will lower its
23 NVPC forecast by \$1 million to reflect a different PMO forecast schedule for the Colstrip

1 and Port Westward plants estimated by the Staff, CUB, and ICNU. ICNU proposed an
2 adjustment up to \$2 million in Monet, which would decrease NVPC. The \$1 million
3 compromise adjustment will appear as a line-item adjustment in Monet.

4 During settlement discussions, CUB identified an issue regarding the updates to the
5 forecast of PMO that can be made in the September Update filing, which is after Parties
6 have filed their testimony and briefs and Parties no longer have the opportunity to comment.
7 In UE 208, Parties agree that PGE will not update the timing or duration of the PMO
8 forecast for its thermal plants. In the next AUT proceeding (2011 test year), at the
9 Prehearing Conference, Parties will explicitly schedule an opportunity for Parties to respond
10 to any possible thermal plant PMO updates subsequent to the April 1 filing. Updates, if any,
11 made by PGE, will be provided to Parties by July 1.

12 CUB also identified an issue regarding the duration and timing of estimates of PMO
13 forecast methodology and proposed a four-year rolling average methodology for the
14 Boardman plant and a six-year rolling average for the Colstrip plant. Parties agree that PGE
15 will continue to forecast Planned Maintenance Outages for its thermal generating plants.
16 PGE agrees that if its PMO forecast for a thermal unit is significantly different from its
17 historical PMOs (e.g., different month and/or duration), PGE will provide documentation for
18 the change. Also, should PGE update its PMO forecast, PGE will provide the
19 documentation for the change and Parties will have an opportunity to review, analyze and
20 challenge the PMO change, and to propose alternatives, including but not limited to the four
21 year average.

22 **Q. Please describe the fifth adjustment to the 2010 Test Year NVPC removing the cost for**
23 **the new standard on WECC Contingency Reserve Requirements.**

1 A. In PGE's NVPC July 11, 2008 Update (UE 197), initial costs were included for the proposed
2 new standards for operating reserves of 3% of control area load and 3% of generation. This
3 new standard, when approved by FERC, would replace the current requirement for total
4 operating reserves equal to 7% of thermal generation and 5% of hydro and wind generation.
5 The overall effect of the change is a material increase in operating reserve requirements for
6 PGE. However, the WECC standard change has still not been approved by FERC.

7 The Parties agree that if FERC approves the WECC proposed changes in operating
8 reserve requirements on or before September 29, 2009, the change should be modeled in
9 2010 power costs consistent with the FERC order. If FERC has not issued a decision by
10 September 29, 2009, then PGE's NVPC forecast in this docket will not include the revised
11 reserve requirements and PGE will remove this change in its update to be filed in November
12 2009. Parties do not dispute the costs currently in Monet for the WECC Reserves.

13 In PGE's July 10th AUT Update (UE 208), PGE estimated the anticipated change in
14 generation reserve requirements at \$1.5 million.

III. Stipulation

1 **Q. Did the Parties stipulate to additional issues in this proceeding?**

2 A. Yes. Staff raised three issues in the proceeding that will not have an impact on 2010 NVPC.

3 The Stipulation provides for an agreement on the following items:

- 4 • After further investigation, the Parties agree that no adjustment to PGE's load
5 forecast regarding SP Newsprint is now necessary.
- 6 • PGE agrees to not change the 2010 Monet modeling of Pelton/Round Butte,
7 should the Selective Water Withdrawal (SWW) be delayed into 2010. The Parties
8 agree that this is appropriate and further agree that any changes in power costs
9 due to construction-related testing of the SWW will not be included in PGE's
10 tariff Schedule 126 power cost adjustment filing for 2010.
- 11 • The Parties agree that there should be no adjustment to the planned maintenance
12 forecast regarding the Colstrip generating facility. The forecast is set for 51 days
13 to complete a generator rewind, low-pressure turbine examination, and a chemical
14 clean.

15 **Q. What do the Parties request of the Commission?**

16 A. The Parties respectfully request that the Commission issue an Order approving the
17 Stipulation in this proceeding finding that it is in the public interest and results in fair, just,
18 and reasonable rates. Further, the Parties request that such Order be issued no later than
19 mid-November to facilitate PGE's compliance tariff filing so that rates may be effective
20 January 1, 2010.

21 **Q. Does this conclude your testimony?**

22 A. Yes.

List of Exhibits

<u>Exhibit</u>	<u>Description</u>
101	AUT Stipulation



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
(503) 464-8926 • Facsimile (503) 464-2200

Douglas C. Tingey
Assistant General Counsel

August 19, 2009

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

Re: UE 208

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and five copies of:

- **STIPULATION REGARDING ALL ISSUES**

This is being filed by electronic mail with the Filing Center.

The parties intend to file joint testimony in support of the stipulation in the near future.

An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided. Thank you in advance for your assistance.

Sincerely,

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

DOUGLAS C. TINGEY
Assistant General Counsel

DCT:cbm
Enclosures
cc: UE 208 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 208

In the Matter of Portland General Electric
Company's 2010 Annual Power Cost Update
Tariff (Schedule 125)

**STIPULATION REGARDING ALL
ISSUES**

This Stipulation ("Stipulation") is among Portland General Electric Company ("PGE"), Staff of the Public Utility Commission of Oregon ("Staff"), the Citizens' Utility Board of Oregon, and the Industrial Customers of Northwest Utilities (collectively, the "Parties").

I. INTRODUCTION

In accordance with its tariff Schedule 125, PGE filed its annual power cost update in this docket on April 1, 2009, including PGE's initial testimony regarding 2010 power costs. PGE also provided the information required under the minimum filing requirements that had been agreed to and adopted in its immediately previous power cost update proceeding. The Parties subsequently sent and responded to data requests. PGE has filed, and will continue to file, updates to its power costs in accordance with the schedule set by the ALJ in this docket. Staff, CUB and ICNU filed testimony on July 8, 2009. The Parties have also held settlement conferences. As a result of those discussions, the Parties have reached agreement settling all issues raised in this proceeding as set forth below. The Parties request that the Commission issue an order adopting this Stipulation.

II. TERMS OF STIPULATION

1. This Stipulation settles all issues in this docket.
2. WECC Reserve Calculation. PGE's projected power costs include an

anticipated change in generation operating reserve requirements proposed by the Western Electricity Coordinating Council ("WECC"), approved by the North American Electric Reliability Corporation ("NERC"), and currently pending before the Federal Energy Regulatory Commission ("FERC") for approval. The Parties agree that if FERC adopts the WECC proposed changes in operating reserve requirements without significant modification on or before September 29, 2009, the change should be modeled in 2010 power costs consistent with the FERC order. If FERC has not issued a decision by September 29, 2009, then PGE's power cost in this docket will not include the revised reserve requirements, and PGE will remove this change in its updates to be filed in September and November 2009.

3. SWW Power Costs. PGE's 2010 power costs do not include any changes in power costs due to construction-related testing of the Round Butte Selective Water Withdrawal Project ("SWW"). The Parties agree that this is appropriate and further agree that any changes in power costs due to construction-related testing of the SWW will not be included in PGE's tariff Schedule 126 power cost adjustment filing for 2010.

4. Load Forecast. After further investigation, the Parties agree that there should be no adjustment to PGE's load forecast regarding SP Newsprint.

5. Colstrip Planned Maintenance. The Parties agree that there should be no adjustment to the planned maintenance forecast regarding the Colstrip generating facility.

6. Planned Maintenance. Some parties raised issues both in this docket and in UM 1355 regarding the modeling of planned maintenance outages for PGE's thermal generating facilities. For purposes of settlement of this docket, the Parties have come to the following agreement:

- a. In this docket, PGE will not update the timing or duration of planned

- maintenance outages for its thermal plants.
- b. In future Schedule 125 AUT dockets, PGE will continue to file its annual power cost update using forecast planned maintenance to model power costs. All Parties may propose a different approach (e.g., the use of a four-year rolling average or other methodology) to modeling planned maintenance in future AUT proceedings. Further, PGE will include with the MFR information the forecast planned maintenance and actual planned maintenance for each thermal plant for each year since 2002. PGE will also provide a comparison of planned maintenance for Boardman between a four-year average and PGE's forecast using the mean square error technique. PGE will also provide a similar comparison for Colstrip using a six-year average.
 - c. In future Schedule 125 AUT dockets, PGE will not update either the duration or timing of forecast planned maintenance after July 1. If PGE does change projected planned maintenance after its initial filing and on or before July 1, PGE will also provide to the parties information which supports the updated planned maintenance schedules.
 - d. In future Schedule 125 AUT dockets, the Parties will propose and support including in the procedural schedule for the docket an opportunity for Staff and Intervenors to respond to any updates to planned maintenance made between April 1 and July 1, and a reply opportunity by PGE.
 - e. PGE will reduce its forecast net variable power costs for 2010 by \$1.0 million to account for changes in planned maintenance.

7. The same Parties have or will enter into a Stipulation in docket UM 1355 regarding several issues related to plant outages. The Parties agree that for purposes of this docket, the modeling changes proposed and agreed to in the UM 1355 Stipulation will be incorporated into the power cost model in this docket, even though the Commission has not issued a final order in UM 1355. If the Commission order in UM 1355 is not consistent with the Parties' Stipulation in that docket, such ordered changes will be reflected in future AUT dockets.

8. The Parties recommend and request that the Commission approve the adjustments described above to PGE's 2010 power costs as appropriate and reasonable resolutions of the issues in this docket.

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

10. 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. Except as provided in this Stipulation, the Parties agree that they will not cite this Stipulation as precedent in any other proceeding other than a proceeding to enforce the terms of this Stipulation. Nothing in this paragraph precludes a party from stating as a factual matter what the parties agreed to in this Stipulation.

11. If this Stipulation is challenged by any other party to this proceeding, or any other party seeks a revenue requirement for PGE that is inconsistent with 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, including the right to raise issues that are incorporated in the settlements embodied in this Stipulation.

Notwithstanding this reservation of rights, the Parties agree that they will continue to support the Commission's adoption of the terms of this Stipulation.

12. 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 that rejects this Stipulation or adds such material condition. Nothing in this paragraph provides any Stipulating Party the right to withdraw from this Stipulation as a result of the Commission's resolution of issues that this Stipulation does not resolve.

13. 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 adopting the settlements contained herein. The Parties also agree to cooperate in drafting and submitting the explanatory brief or written testimony required by OAR § 860-14-0085(4).

14. 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.

15. 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.

DATED this ^{16th} day of August, 2009.



PORTLAND GENERAL ELECTRIC
COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

CITIZENS' UTILITY BOARD
OF OREGON

INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

DATED this 17th day of August, 2009.

PORTLAND GENERAL ELECTRIC
COMPANY



STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

CITIZENS' UTILITY BOARD
OF OREGON

INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

DATED this ^{7th} day of August, 2009.

PORTLAND GENERAL ELECTRIC
COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON



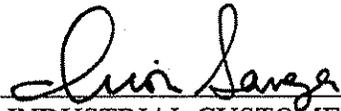
CITIZENS' UTILITY BOARD
OF OREGON

INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

PORTLAND GENERAL ELECTRIC
COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

CITIZENS' UTILITY BOARD
OF OREGON



INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **STIPULATION REGARDING ALL ISSUES** to be served by electronic mail to those parties whose email addresses appear on the attached service list and by method specified, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UE 208.

Dated at Portland, Oregon, this 19th day of August, 2009.



DOUGLAS C. TINGEY, OSB # 044366
Assistant General Counsel
Portland General Electric Company
121 SW Salmon St., 1WTC1301
Portland, OR 97204
(503) 464-8926 (telephone)
(503) 464-2200 (fax)
doug.tingey@pgn.com

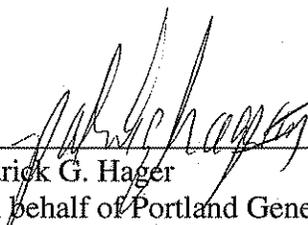
**SERVICE LIST –
OPUC DOCKET # UE 208**

Robert Jenks CITIZEN'S UTILITY BOARD OF OREGON bob@oregoncub.org (*Waived Paper Service)	G. Catriona McCracken CITIZEN'S UTILITY BOARD OF OREGON catriona@oregoncub.org (*Waived Paper Service)
S. Bradley Van Cleve DAVISON VAN CLEVE 333 SW Taylor, Suite 400 Portland, OR 97204 mail@dvclaw.com	Ed Durrenberger Oregon Public Utility Commission 550 Capitol Street NE, #215 Salem, OR 97308-2148 ed.durrenberger@state.or.us
Stephanie A. Andrus, Assistant AG Department of Justice 1162 Court Street, NE Salem, OR 97301-4096 stephanie.andrus@state.or.us	Randall J. Falkenberg RFI CONSULTANTS, INC. PMB 362 8343 Roswell Road Sandy Springs, GA 30350 consultrfi@aol.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **STAFF-ICNU-CUB-PGE UE 208 JOINT TESTIMONY** 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 208.

Dated at Portland, Oregon, this 9th day of September 2009.



Patrick G. Hager
On behalf of Portland General Electric Company

Summary Report**UE 208 PORTLAND GENERAL ELECTRIC 2010 ANNUAL POWER COST UPDATE****Category:** Electric Rate Case**Filed By:** PORTLAND GENERAL ELECTRIC

In the Matter of
 PORTLAND GENERAL ELECTRIC COMPANY
 2010 Annual Power Cost Update Tariff (Schedule 125)
 w/Motion for Protective Order and Supporting Testimony.
 Filed by Douglas C. Tingey; Hard copy rec'd 4/2/09.

Filing Date: 4/1/2009**Case** DURRENBERGER, ED (503) 373-1536**Law Judge(s):** POWER, PATRICK**SERVICE LIST:**

STEPHANIE S ANDRUS -- CONFIDENTIAL
 DEPARTMENT OF JUSTICE
 REGULATED UTILITY & BUSINESS SECTION
 1162 COURT ST NE
 SALEM OR 97301-4096

RANDALL DAHLGREN -- CONFIDENTIAL
 PORTLAND GENERAL ELECTRIC
 121 SW SALMON ST - 1WTC1711
 PORTLAND OR 97204

ED DURRENBERGER -- CONFIDENTIAL
 OREGON PUBLIC UTILITY COMMISSION
 PO BOX 2148
 SALEM OR 97308-2148

RANDALL J FALKENBERG -- CONFIDENTIAL
 RFI CONSULTING INC
 PMB 362
 8343 ROSWELL RD
 SANDY SPRINGS GA 30350

ROBERT JENKS -- CONFIDENTIAL
 CITIZENS' UTILITY BOARD OF OREGON
 610 SW BROADWAY STE 308
 PORTLAND OR 97205

G. CATRIONA MCCrackEN -- CONFIDENTIAL
 CITIZEN'S UTILITY BOARD OF OREGON
 610 SW BROADWAY - STE 308
 PORTLAND OR 97205

DOUGLAS C TINGEY -- CONFIDENTIAL
 PORTLAND GENERAL ELECTRIC
 121 SW SALMON 1WTC13
 PORTLAND OR 97204

S BRADLEY VAN CLEVE -- CONFIDENTIAL
 DAVISON VAN CLEVE PC
 333 SW TAYLOR - STE 400
 PORTLAND OR 97204