



Portland General Electric Company

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Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Portland General Electric Company, Docket No. OA08-111-____, Annual Informational Filing on Operational Penalty Assessments and Distributions as Required by Order Nos. 890 and 890-A

Dear Secretary Bose:

Pursuant to Order No. 890¹ of the Federal Energy Regulatory Commission (“Commission”), Portland General Electric Company (“PGE”) hereby submits its annual informational filing regarding its 2014 penalty assessments and distributions. Consistent with the Commission’s requirements, this filing contains: (1) a summary of penalty revenue credits by transmission customer; (2) total penalty revenues collected from affiliates; (3) total penalty revenues collected from non-affiliates; (4) a description of the costs incurred as a result of the offending behavior; and (5) a summary of the portion of unreserved use penalty retained by the transmission provider.

In Order No. 890-A, the Commission clarified that transmission providers are to submit a one-time compliance filing proposing the transmission provider’s methodology for distributing revenues from late study penalties and, if applicable, unreserved use penalties. This one-time compliance filing is to be submitted “at any time prior to the first distribution of operational penalties.”² PGE has not yet incurred any late study penalties and is not authorized to impose unreserved use penalties on its customers.³ As such, PGE has not yet had cause to distribute operational penalties and has not yet submitted the one-time compliance filing setting forth PGE’s distribution methodology.

¹ *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, Fed. Reg. 12,226 at P 864 (March 15, 2007), FERC Stats. & Regs. ¶ 31,241 (2007) (“Order No. 890”), *order on reh’g*, 121 FERC ¶ 61,297 (2007) (“Order No. 890-A”), *order on reh’g*, 123 FERC ¶ 61,299 (2008) (“Order No. 890-B”), *order on reh’g*, 126 FERC ¶ 61,228 (2009) (“Order No. 890-C”).

² Order No. 890-A at P 472.

³ In an April 10, 2008, filing in Docket No. ER08-815-000, PGE removed language from its Open Access Transmission Tariff that formerly authorized PGE to charge unreserved use penalties. That filing was accepted in a June 6, 2008, Letter Order in the same docket.

PGE hereby reports that it neither assessed nor distributed any operational penalties for late studies or unreserved use of transmission service in 2014. More specifically:

- (1) PGE provided no penalty revenue credits for any transmission customer;
- (2) PGE collected no penalty revenues from affiliates;
- (3) PGE collected no penalty revenues from non-affiliates;
- (4) PGE incurred no costs associated with late studies or unreserved use; and
- (5) PGE retained no amounts associated with unreserved use penalties.

PGE has posted a copy of this filing on its OASIS.

Please contact the following persons if you have any questions concerning this filing.

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Respectfully Submitted,

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