

April 30, 2008

TO: Brad Van Cleve
Industrial Customers of NW Utilities

FROM: Randy Dahlgren
Director, Regulatory Policy & Affairs

**PORTLAND GENERAL ELECTRIC
UE 197
PGE Response to ICNU Data Request 3.207
Dated April 16, 2008
Question No. 207**

Request:

It appears that the Company applies the same deration factor to unit minimum capacities as it does to the maximum capacities (generally 1-EFOR in months w/o planned outages) in Monet. Please confirm whether this is correct, please explain the purpose of this adjustment, and please explain why it is proper.

Response:

This is correct. Monet is in effect modeling a 100 MW plant with a 50 MW minimum level of operation as if plant operation at 50 MW is not available 5% of the time.