

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 3.208
Dated April 16, 2008
Question No. 208**

Request:

It appears that the Company uses the same heat rates at maximum capacity irrespective of the level of capacity deration applied for outages in Monet. For example, if Monet included a 100 mW unit with a 5% EFOR, it would be modeled as a 95 mW unit in Monet. The heat rate for the unit when derated to 95 mW would be equal to that of the unit at full load (100 mW) without any deration. Please confirm if this is correct, and please explain why.

Response:

This is correct. Monet is in effect modeling a 100 MW plant operating at a heat rate appropriate to 100 MW operation with the plant (operating at 100 MW) not available 5% of the time.