

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 3.209  
Dated April 16, 2008  
Question No. 209**

**Request:**

**It appears that the Company uses the same heat rates at minimum 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 and a 50 mW minimum, it would be modeled in the program as a unit with a minimum of 47.5 mW. However, the heat rate for the unit when derated to 47.5 mW would be equal to that of the unit at minimum load (50 mW) without 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 50 MW operation with the plant (operating at 50 MW) not available 5% of the time.