



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

April 24, 2009

Email/US Mail

Filing Center
Oregon Public Utility Commission
550 Capitol Street, N.E., Ste 215
Salem, OR 97301-2551

RE: UM___ PGE's Application for Deferred Accounting of Revenues and Expenses Associated with a Residential Critical Peak Pricing Pilot

Enclosed are the original signed Application and one copy of Portland General Electric Company's application for deferred accounting of Revenues and Expenses Associated with a Residential Critical Peak Pricing Pilot.

Notice of Application for Deferred Accounting of Revenues and Expenses Associated with a Residential Critical Peak Pricing Pilot has been forwarded to the UE-197 service list. This document is being filed by electronic mail with the Filing Center. PGE waives paper service of documents in this proceeding and has E-filed a copy on this date.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7580 or Jay Tinker at (503) 464-7002.

Please direct all formal correspondence, questions, or requests to the following e-mail address pge.opuc.filings@pgn.com.

Sincerely,

Patrick G. Hager
Manager, Regulatory Affairs

Encls.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Revenues and Expenses Associated with a Residential Critical Peak Pricing Pilot

Application for Deferral of Revenues and Expenses Associated with a Residential Critical Peak Pricing Pilot

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (“PGE”) hereby requests authorization to defer for later rate-making treatment revenues associated with the Critical Peak Pricing (CPP) pilot. In support of this Application PGE states:

1. PGE is a public utility in the state of Oregon and its rates, services and accounting practices are subject to the regulation of the Oregon Public Utility Commission (“Commission”).
2. This application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items for later incorporation in rates.
3. Communications regarding this Application should be addressed to:

Randy Dahlgren
Rates & Regulatory Affairs
Portland General Electric,
1 WTC0702
121 SW Salmon Street
Portland, Oregon 97204
Phone: 503.464.7857
E-mail: pge.opuc.filings@pgn.com

Douglas C. Tingey
Assistant General Counsel
Portland General Electric,
1 WTC1301
121 SW Salmon Street
Portland, Oregon 97204
Phone: 503.464.8926
E-mail: Doug.Tingey@pgn.com

PGE waives paper service in this proceeding. In addition to the names and addresses above the following are to received notices and communications via the e-mail service list:

Patrick G. Hager, Manager, Regulatory Affairs
E-mail: Patrick.Hager@pgn.com

Jay Tinker, Project Manager, Regulatory Affairs
E-mail: Jay.Tinker@pgn.com

I. OAR 860-027-0300(3) Requirements

The following is provided pursuant to OAR 860-027-0300(3).

A. Background

As part of the stipulation for Commission Order No. 08-245, PGE has developed a Residential Critical Peak Pricing (CPP) Pilot program (Schedule 12). Special Condition 8 of Schedule 12 requires PGE to maintain a revenue true-up and pilot cost recovery Balancing Account to:

- a. Accrue the difference between the CPP pilot (Schedule 12) revenue and revenue that would otherwise have been billed if participating Customers were served under Schedule 7.
- b. Accrue the incremental CPP pilot costs including, but not limited to: systems for Customer notification, billing, Customer information display, Customer enrollment and education, program operations, acquisition and installation of usage curtailment enabling technology and associated support, event notification, communication, Customer surveys, impact assessment, and rebates or coupons.

The amounts accrued in the Balancing Account will be recovered through Schedule 105, Regulatory Adjustments, in a manner approved by the Commission. Any balance in the Balancing Account will accrue interest at the Commission-authorized rate for deferred accounts.

This application for deferral accounting facilitates the balancing account requirements described in Special Condition 8 of Schedule 12. As PGE presented in the CPP workshops, approval of the deferral application is necessary to proceed with the CPP pilot since costs are not included in any other cost recovery mechanism.

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e), for the reasons discussed above, PGE seeks deferred accounting treatment of the revenues and expenses associated with the Residential CPP pilot. The granting of this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. Approving the Application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

C. Proposed Accounting

If the amounts deferred are for later collection, PGE proposes to record the deferred amount as a regulatory asset in FERC account 182.3, Other Regulatory Assets, with a credit to FERC account 456, Other Revenue. If the amounts deferred are for later refund, PGE proposes to record the deferred amount as a credit to FERC account 254, Regulatory Liabilities, with a debit to FERC account 456, Other Revenues. In the absence of a deferred accounting order from the Commission, PGE would record actual Schedule 7 and Schedule 12 revenues in FERC 440 (Residential Sales), and PGE would record the incremental implementation costs of the CPP Pilot to a variety of FERC operating expense accounts depending on the nature of the expense.

D. Estimate of Amounts

The amount of the difference between the Schedule 12 revenue and revenue that would otherwise have been billed if participating Customers were served under Schedule 7 is determined by the number of participants in the pilot and the usage patterns of participating customers. Since the number of participants in the CPP pilot and their usage patterns are not known, the amount of such revenues to be deferred is also unknown.

PGE estimates the incremental costs of the CPP pilot to be approximately \$3.2 million.

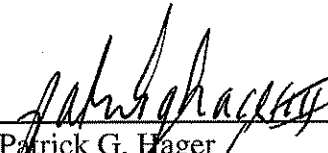
E. NOTICE

A copy of the notice of application for deferred accounting treatment and a list of persons served with the notice are attached to the Application as Attachment A.

II. Conclusion

For the reasons stated above, PGE requests permission to defer revenues and expenses associated with the Residential Critical Peak Pricing Pilot.

DATED this 24th day of April, 2009.



Patrick G. Hager
Manager, Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0702
Portland, OR 97204
Telephone: 503.464.7580
Fax: 503.464.7651
E-Mail: patrick.hager@pge.com

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Attachment A

Notice of Application for Deferral of Revenues and Expenses Associated with the Residential Critical Peak Pricing Pilot

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM _____**

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Revenues and Expenses Associated with the Residential Critical Peak Pricing Pilot

Notice of Application for Deferral of Revenues and Expenses Associated with the Residential Critical Peak Pricing Pilot

On April 24, 2009, Portland General Electric Company ("PGE") filed an application with the Oregon Public Utility Commission (the "Commission") for an Order authorizing deferral of revenues and expenses associated with the Residential Critical Peak Pricing (CPP) pilot with the Oregon Utility Commission (the "Commission").

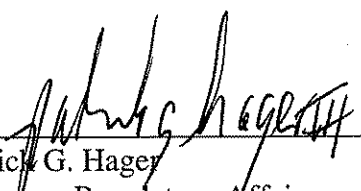
Approval of PGE's Application will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Persons who wish to obtain a copy of PGE's application should contact the following:

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC-0702
Portland, OR 97204
(503) 464.7857 (telephone)
(503) 464.7651 (fax)
pge.opuc.filings@pgn.com

Any person who wishes to submit written comments to the Commission on PGE's application must do so no later than April 24, 2009.

Dated: April, 24, 2009

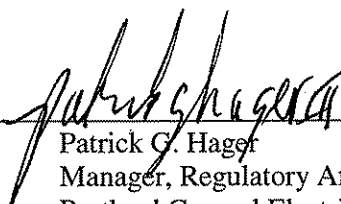


Patrick G. Hager
Manager, Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0702
Portland, OR 97204
Telephone: 503.464.7580
Fax: 503.464.7651
E-Mail: patrick.hager@pgn.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Deferral of Revenues and Expenses Associated with a Residential Critical Peak Pricing Pilot** to be served by Electronic Mail to those parties whose e-mail addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, upon those parties on the attached service list who have not waived paper service from OPUC Docket No. UE 197.

Dated at Portland, Oregon, this 24th day of April, 2009



Patrick G. Hager
Manager, Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0702
Portland, OR 97204
Telephone: 503-464-7580
Fax: 503-464-7651
E-Mail: patrick.hager@pgn.com

Summary Report**UE 197 PORTLAND GENERAL ELECTRIC****Category:** Electric Rate Case**Filed By:** PORTLAND GENERAL ELECTRIC

This filing requests a general rate revision.

Filing Date: 2/27/2008 **Advice No:** 08-02**Effective Date:** 1/1/2009 **Expiration Date:** 12/31/2008 **Status:** PERM SUSPEND**See also:** UE 198 08-23**Final Order:** **Signed:** 2/27/2008**SERVICE LIST:**

COMMUNITY ACTION PARTNERSHIP OF OREGON
PO BOX 7964
SALEM OR 97301

KURT J BOEHM -- CONFIDENTIAL
BOEHM KURTZ & LOWRY
36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202

ROGER D. COLTON -- CONFIDENTIAL
FISHER SHEEHAN & COLTON
34 WARWICK RD
BELMONT MA 02478

JOAN COTE -- CONFIDENTIAL
OREGON ENERGY COORDINATORS ASSOCIATION
2585 STATE ST NE
SALEM OR 97301

JIM DEASON -- CONFIDENTIAL
ATTORNEY AT LAW
1 SW COLUMBIA ST, SUITE 1600
PORTLAND OR 97258-2014

OPUC DOCKETS
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205

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

JUDY JOHNSON -- CONFIDENTIAL
PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM OR 97308-2148

JASON W JONES -- CONFIDENTIAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096

MICHAEL L KURTZ -- CONFIDENTIAL
BOEHM KURTZ & LOWRY
36 E 7TH ST STE 1510
CINCINNATI OH 45202-4454

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

KIP PHEIL -- CONFIDENTIAL
OREGON DEPARTMENT OF ENERGY
625 MARION ST NE - STE 1
SALEM OR 97301-3737

JANET L PREWITT -- CONFIDENTIAL
*DEPARTMENT OF JUSTICE
NATURAL RESOURCES SECTION
1162 COURT ST NE
SALEM OR 97301-4096

PATRICK HAGER G RATES & REGULATORY AFFAIRS --
CONFIDENTIAL
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST 1WTC0702
PORTLAND OR 97204

Summary Report

UE 197 PORTLAND GENERAL ELECTRIC

VIJAY A SATYAL
OREGON DEPARTMENT OF ENERGY
625 MARION ST NE
SALEM OR 97301

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

MICHAEL T WEIRICH -- CONFIDENTIAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096

SCOTT WINKELS -- CONFIDENTIAL
LEAGUE OF OREGON CITIES
PO BOX 928
SALEM OR 97308