



Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

May 26, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: **UM 1482 Application for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot**

Dear Filing Center:

Enclosed for filing is the Application of Portland General Electric Company (PGE) for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot (PV VIR Pilot). Per OAR 860-027-0300(2), the authorized deferral expires 12 months from the date authorization becomes effective.

PGE hereby requests continued reauthorization of the PV VIR Pilot deferral for the period May 27, 2023 through May 26, 2024.

A Notice of Application regarding the filing of this application is attached. We have provided notification to the UM 1482 and UE 394 service lists. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Should you have questions or comments regarding this filing, please contact me at (503) 464-7488.

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

JF/np
Enclosure
cc: UM 1482 and UE 394 Service Lists

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1482

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Expenses
Associated with a Photovoltaic Volumetric
Incentive Rate Pilot.

**APPLICATION FOR DEFERRAL
REAUTHORIZATION**

Pursuant to ORS 757.259, ORS 757.365, ORS 469A.120, ORS 757.210, OAR 860-027-0300, OAR 860-084-0380, and OAR 860-084-0390, Portland General Electric Company (“PGE”) Schedule 137 is an automatic adjustment clause (“AAC”) for costs related to PGE’s Photovoltaic Volumetric Incentive Rate Pilot (“PV VIR Pilot” or “Pilot”). Oregon Revised Statute 757.365(10) allows for the recovery of all prudently incurred PV VIR costs in rates. As necessary to enable cost recovery under the AAC, PGE hereby requests authorization to continue an AAC deferral pursuant to Public Utility Commission of Oregon (the “Commission” or “OPUC”) Order Nos. 19-283, 20-195, 21-196, and 22-452. PGE requests this reauthorization to be effective May 27, 2023 through May 26, 2024.

I. Deferral History:

Under Docket No. AR 538, the Commission promulgated its Division 84 rules for the PV VIR Pilot. Docket UM No. 1482 set forth additional implementation requirements through OPUC Orders detailed below, the most recent being Order Nos. 19-283, 20-195, 21-196, and 22-452. The Pilot, required by state law, provides payments to retail electric customers for electricity generated by permanently installed solar photovoltaic energy systems through PGE Schedules 215, 216, and 217. This deferral allows PGE to recover costs associated with the Pilot, through an AAC

under PGE Schedule 137, Customer Owned Solar Payment Option Cost Recovery Mechanism.

PGE has received reauthorization for this deferral since 2011, as shown in Table 1 below:

Table 1: UM 1482 Commission Authorization

Order No.	Approval Date
11-059	2/16/2011
11-281	8/01/2011
12-202	5/07/2012
13-250	7/02/2013
14-271	7/22/2014
15-185	06/09/2015
17-304	06/10/2017
18-259	07/03/2018
19-283	8/29/2019
20-195	6/18/2020
21-196	6/15/2021
22-452	11/18/2022

II. OAR 860-027-0300 Requirement (3):

a. Description of Utility Expense for which deferred accounting is requested.

The incremental utility expenses consist of volumetric incentive payments and/or retail bill offsets to participants, administrative costs associated with the PV VIR Pilot operations, data collection, development costs for billing and website, customer surveys, and regulatory reporting requirements. Credits to the associated balancing account include deposit forfeitures, interconnection application fees, customer charges, assignment fees, and the avoided energy value. Amounts in the balancing account accrue interest at the Commission-authorized rate of return for deferred accounts.

b. Reasons for Deferral

PGE seeks deferral reauthorization for the reasons stated in Section I, above.

c. Proposed accounting for recording amounts deferred

PGE proposes no changes in the established accounting for the deferred amount.

d. Estimate of Amounts to be recorded for the next 12 months.

The amounts to be deferred consist of incremental costs of the Pilot for: 1) VIR payments to participants including any retail electricity service bill offset amounts; and 2) program costs incurred to implement and administer the requirements for the Pilot as described in Section II (a) above. For both cost categories, the amounts deferred depend upon actual participation levels and PV system sizes of participants in the Pilot. PGE estimates incremental costs may range from \$7.0 million to \$8.0 million for the deferral period, May 27, 2023 through May 26, 2024, consisting largely of VIR payments to participants.

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with the notice are provided as Attachment A (OAR 860-027-0300[6]).

III. OAR 860-027-0300 Requirement (4), Reauthorization:

a. Description of deferred accounting entries

See II c., above.

b. The reason for continuing the deferred account

PGE seeks approval to continue to defer incremental costs associated with the Pilot not currently in rates. The granting of this reauthorization request will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. This deferral should be continued and is warranted because ORS 757.365 requires PGE to offer the Pilot and thus incur the costs to implement and operate the Pilot. PGE requests an effective date of May 27, 2023 through May 26, 2024, as the deferral reauthorization period.

IV. **PGE Contacts:**

The authorized addresses to receive notices and communications in respect to this application are:

Kim Burton
Assistant General Counsel
Portland General Electric
121 SW Salmon Street
Portland, OR 97204
Phone: 573.356.9688
E-mail: kim.burton@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric
121 SW Salmon Street
Portland, OR 97204
Phone: 503.464.8172
E-mail: pge.opuc.filings@pgn.com

In addition to the names and addresses above the following are to receive notices and communications via the e-mail service list:

Jaki Ferchland
Manager, Revenue Requirement
Email: Jacquelyn.Ferchland@pgn.com

V. **Summary of Filing Conditions:**

Information related to future amortization is listed below:

- a. Earnings Review: PGE Schedule 137 recovers costs associated with the Solar Payment Option Pilot not otherwise included in rates. Because this schedule is an AAC as provided under ORS 469A.120 and defined in the Renewable Portfolio Standards, pursuant to ORS 757.210, an earnings review is not applicable to this deferral. See also PGE Schedules 215, 216, and 217.
- b. Prudence Review: Staff may review deferred costs as appropriate.
- c. Sharing (Percent): All prudently incurred costs are to be recoverable by PGE with no sharing mechanism.
- d. Rate Spread/Rate Design: In Docket No. UE 237, Commission Staff and parties agreed that PGE Schedule 137 costs should be allocated to each schedule (all customer classes) based on an equal percent of generation revenue applied on a cents per kilowatt-hour basis.

e. Three Percent Test: The amortization of the deferred costs will not be subject to the three percent test in accordance with ORS 757.259(6) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

VI. Conclusion.

For the reasons stated above, and as necessary to enable cost recovery under an AAC, PGE requests permission to continue to defer expenses associated with the Solar Payment Option Pilot effective May 27, 2023, through May 26, 2024.

DATED May 26, 2023.

/s/ Jaki Ferchland
Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: pge.opuc.filings@pgn.com

UM 1482

Attachment A

**Notice of Application for Reauthorization to Defer Expenses
Associated with a Photovoltaic Volumetric Incentive Rate Pilot,
Aka, the Solar Payment Option Pilot**

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1482**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Expenses
Associated with a Photovoltaic Volumetric
Incentive Rate Pilot.

**NOTICE OF APPLICATION FOR
DEFERRAL REAUTHORIZATION**

On May 26, 2023, Portland General Electric Company (“PGE”) filed an application with the Public Utility Commission of Oregon (the “Commission”) for an Order reauthorizing deferral of certain expenses associated with a Photovoltaic Volumetric Incentive Rate Pilot, also known as PGE Solar Payment Option Pilot.

Approval of PGE’s Application will continue to support the use of an automatic adjustment clause rate schedule, which will provide for changes in rates reflecting incremental costs associated with the pilot.

Persons who wish to obtain a copy of PGE’s application will be able to access it on the Commission website.

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than June 21, 2023.

DATED this 26th day of May, 2023.

/s/ Jaki Ferchland
Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: pge.opuc.filings@pgn.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the UM 1482 **Notice of Application for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, aka PGE Solar Payment Option Pilot** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service lists in UM 1482 and UE 394.

DATED at Portland, Oregon, this 26th day of May 2023.

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company

121 SW Salmon Street, 1WTC0306

Portland, OR 97204

Telephone: 503-464-7488

E-Mail: pge.opuc.filings@pgn.com

**UM 1482
SERVICE LIST**

STEPHANIE S ANDRUS Oregon Department of Justice	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@doj.state.or.us
KIM BURTON PORTLAND GENERAL ELECTRIC	121 SW SALMON STREET PORTLAND OR 97204 kim.burton@pgn.com
HEATHER COHEN PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 heather.b.cohen@puc.oregon.gov
ROBERT JENKS OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
MITCH MOORE PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 mitch.moore@puc.oregon.gov
BRADLEY MULLINS MW ANALYTICS, ENERGY & UTILITIES	LUMMINTIE 13 OULU FI-90460 brmullins@mwanalytics.com
Share OREGON CITIZENS' UTILITY BOARD OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
TYLER C PEPPLE DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com
Share PGE RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com
WENDY SIMONS OREGON DEPARTMENT OF ENERGY	550 CAPITOL ST NE 1ST FL SALEM OR 97301 wendy.simons@energy.oregon.gov

KATHY ZARATE
PUBLIC UTILITY
COMMISSION OF OREGON

201 HIGH ST SE STE 100
SALEM OR 97301
kathy.zarate@puc.oregon.gov

PGE

JAKI FERCHLAND
PORTLAND GENERAL
ELECTRIC

121 SW SALMON ST.
1WTC0306
PORTLAND OR 97204
jacquelyn.ferchland@pgn.com

**SERVICE LIST
OPUC DOCKET NO. UE 394**

RALPH CAVANAGH NATURAL RESOURCES DEFENSE COUNCIL	111 SUTTER ST FL 20 SAN FRANCISCO CA 94104 rcavanagh@nrdc.org
LAUREN MCCLOY NW ENERGY COALITION	811 1ST AVE SEATTLE WA 98104 lauren@nwenergy.org
MICHELLE ORTON-BROWN WALMART	morton- brown@parsonsbehle.com
WILLIAM STEELE (C) BILL STEELE AND ASSOCIATES, LLC	PO BOX 631151 HIGHLANDS RANCH CO 80164 w.steele1@icloud.com
AWEC	
JESSE O GORSUCH (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 jog@dvclaw.com
CORRINE OLSON (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY, STE. 450 PORTLAND OR 97201 coo@dvclaw.com
TYLER C PEPPLER (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com
CALPINE SOLUTIONS	
GREGORY M. ADAMS (C) (HC) RICHARDSON ADAMS PLLC	515 N 27TH ST BOISE ID 83702 greg@richardsonadams.com
GREG BASS CALPINE ENERGY SOLUTIONS, LLC	401 WEST A ST, STE 500 SAN DIEGO CA 92101 greg.bass@calpinesolutions.com
KEVIN HIGGINS (C) (HC) ENERGY STRATEGIES LLC	215 STATE ST - STE 200 SALT LAKE CITY UT 84111- 2322 khiggins@energystrat.com

FRED MEYER

JUSTIN BIEBER (C)
FRED MEYER/ENERGY
STRATEGIES LLC

215 SOUTH STATE STREET,
STE 200
SALT LAKE CITY UT 84111
jbieber@energystrat.com

KURT J BOEHM (C)
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

JODY KYLER COHN (C)
BOEHM KURTZ & LOWRY

36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkylercohn@bkllawfirm.com

NIPPC

CARL FINK
BLUE PLANET ENERGY LAW
LLC

628 SW CHESTNUT ST, STE
200
PORTLAND OR 97219
cmfink@blueplanetlaw.com

SPENCER GRAY
NIPPC

sgray@nippc.org

**OREGON CITIZENS UTILITY
BOARD**

WILLIAM GEHRKE (C)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97206
will@oregoncub.org

MICHAEL GOETZ (C)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97205
mike@oregoncub.org

Share OREGON CITIZENS'
UTILITY BOARD
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY, STE
400
PORTLAND OR 97205
dockets@oregoncub.org

PGE

PORTLAND GENERAL
ELECTRIC

pge.opuc.filings@pgn.com

KIM BURTON
PORTLAND GENERAL
ELECTRIC

121 SW SALMON STREET
PORTLAND OR 97204
kim.burton@pgn.com

JAY TINKER (C)
PORTLAND GENERAL
ELECTRIC

121 SW SALMON ST 1WTC-
0306
PORTLAND OR 97204
pge.opuc.filings@pgn.com

SBUA

JAMES BIRKELUND
SMALL BUSINESS UTILITY
ADVOCATES

548 MARKET ST STE 11200
SAN FRANCISCO CA 94104
james@utilityadvocates.org

DIANE HENKELS (C)
SMALL BUSINESS UTILITY
ADVOCATES

621 SW MORRISON ST. STE
1025
PORTLAND OR 97205
diane@utilityadvocates.org

STAFF

STEPHANIE S ANDRUS (C)
Oregon Department of Justice

BUSINESS ACTIVITIES
SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@doj.state.or.us

MATTHEW MULDOON (C)
PUBLIC UTILITY COMMISSION
OF OREGON

PO BOX 1088
SALEM OR 97308-1088
matt.muldoon@puc.oregon.gov

WALMART

VICKI M BALDWIN (C)
PARSONS BEHLE & LATIMER

201 S MAIN ST STE 1800
SALT LAKE CITY UT 84111
vbaldwin@parsonsbehle.com