

Applicable Law

Pursuant to ORS 757.365(10), all prudently-incurred costs associated with compliance with ORS 757.365 (pilot program for small solar energy systems) are recoverable in the utility's rates.

Under ORS 469A.120(1) and (3), all prudently incurred costs associated with the renewable portfolio standards are recovered through an automatic adjustment clause. ORS 757.259 and OAR 860-027-0300 are the laws that concern deferrals and the automatic adjustment mechanism.

The Company made this filing pursuant to ORS 757.365(10), 469A.120(1) and (3), ORS 757.259, and OAR 860-027-0300. Deferral of these OSIP costs was granted by the Commission in OPUC Order No. 11-059 and has been annually reauthorized—most recently by Order No. 21-196.

Analysis

Background

PGE requests reauthorization to defer the costs and expenses associated with the photovoltaic feed-in tariff pilot program, including payments to owners of qualified systems for generation (i.e., a volumetric incentive rate) and costs associated with the administration of the pilot program.

The Company will seek amortization of the deferred amount in a future Commission proceeding. This deferral is necessary to allow the Company to recover costs associated with compliance with ORS 757.365, as allowed by ORS 757.365(10).

The PV VIR was established in compliance with the rules adopted in Docket No. AR 538. Commission Order Nos. 10-198, 10-304, 11-089, and 11-281 in Docket No. UM 1452 set out additional requirements. The Pilot provides payments to retail electric customers for electricity generated by permanently installed solar photovoltaic energy systems (i.e., a volumetric incentive rate) through PGE Schedules 215, 216, and 217.

This deferral, also, allows PGE to recover costs associated with the pilot, through an AAC under PGE Schedule 137, Customer Owned Solar Payment Option Cost Recovery Mechanism.

Description of Expenses

The expense to be deferred is the prudently incurred incremental costs to administer the program and include volumetric incentive payments and/or retail bill offsets to participants; administrative costs associated with the PV VIR program operations; data collection; development costs for billing and website; customer surveys; and regulatory reporting requirements. Credits to the 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.

Reason for Deferral

The incremental costs associated with compliance with ORS 757.365 are not currently included in rates. As the statute provides that prudently incurred costs associated with compliance with the statute are recoverable in rates, the deferral is necessary to accomplish that outcome. Continuation of this deferral will minimize the frequency of rate changes or fluctuations and match appropriately the costs borne by and benefits received by customers

Proposed Accounting

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 407.4, Regulatory Credits. In the absence of a deferred accounting order from the Commission, PGE would continue to record costs associated with the Pilot to FERC Account 903, Customer Records and Collection Expenses, and FERC Account 908, Customer Assistance expenses.

Estimated Deferrals in Authorization for the Next 12 Months

The amounts to be deferred consist of incremental costs of the Pilot for one, VIR payments to participants including any retail electricity service bill offset amounts, and two, program costs incurred to implement and administer the requirements for the Pilot.

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 million to \$8 million for the deferral period, May 27, 2022, through May 26, 2023, consisting largely of VIR payments to participants.

Information Related to Future Amortization

- 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, ORS 757.210, an earnings review is not applicable to this deferral. See also PGE Schedules 215, 216, and 217.

- Prudence Review – A review to determine that costs were prudently incurred must be done prior to amortization. The review should include the verification of the accounting methodology used to determine the final amortization balance. In addition, any amounts includable in the deferral should be shown that such costs are not being recovered in current rates, meaning they are incremental costs above those collected in rates.
- Sharing – This deferral is not subject to a sharing mechanism.
- Rate Spread/Design – In Docket No. UE 237, the Parties agreed that Schedule 137 costs be allocated to each schedule based on an equal percent of generation revenue applied on a cents per kilowatt-hour basis.
- Three Percent Test (ORS 757.259(6)) – The three percent test measures the annual overall average effect on customer rates resulting from deferral amortizations. The three percent test limits (exceptions at ORS 757.259(7) and (8)) the aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year. Because PGE is an electric utility, ORS 757.259(8) allows the Commission to consider up to a six percent limit. The limit for these deferrals will be determined at the time of amortization.

Conclusion

As PGE's application to defer is appropriately made under the statutes, and the application meets the requirements of OAR 860-027-0300, Staff recommends approval with the condition included below in the Proposed Commission Motion.

PGE has reviewed this memo and agrees with its content.

PROPOSED COMMISSION MOTION:

Approve Portland General Electric's request for reauthorization to defer costs associated with the Photovoltaic Volumetric Incentive Rate Pilot for the 12-month period beginning May 27, 2022, through May 26, 2023, subject to Staff's recommended condition.