

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1817**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY,	)	OREGON CITIZENS' UTILITY BOARD'S REPLY TO PGE AND
	)	AWEC'S BENCH REQUEST
Application for the Deferral of Storm-Related Restoration Costs.	)	RESPONSE
	)	

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Pursuant to Administrative Law Judge (“ALJ”) Lackey’s May 24, 2019 Bench Request, the Oregon Citizens’ Utility Board (“CUB”) submits the following reply to the May 31, 2019 Bench Request responses submitted by Portland General Electric (“PGE” or “the Company”) and the Alliance of Western Energy Consumers (“AWEC”). CUB’s reply also addresses the reply filed by AWEC on June 7, 2019. CUB appreciates the opportunity to provide a reply to the options to refund PGE’s over-recovery of Level III storm costs delineated by PGE and AWEC in their respective Bench Request Responses. As noted by AWEC in testimony—and acknowledged by PGE—the Company is over-collecting \$100,000 on an annual basis.<sup>1</sup>

CUB appreciates PGE’s desire to minimize the amount of annual administrative processing for a relatively minor amount. With the clarification offered by AWEC on June 7, 2019, CUB can support the Company’s “Method 1” that would allow for the \$100,000 to remain in the Level III storm accrual until PGE’s next general rate case.<sup>2</sup> CUB’s understanding of the

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<sup>1</sup> See UM 1817 – AWEC/100/Hellman/21-22 and UM 1817 – PGE/200/Nicholson – Bekkedahl – Tooman/19.  
<sup>2</sup> UM 1817 – PGE Response to OPUC Bench Request (May 31, 2019); UM 1817 – AWEC Reply to PGE’s Response to Bench Request at 1-2 (June 7, 2019).

Company's proposal mirrors the approach delineated by AWEC in the June 7 filing. Setting \$100,000 as the effective \$0 threshold would ensure that the account never goes below that amount and would be increased by monthly amounts plus interests as discussed in AWEC's proposal. CUB supports AWEC's proposal to increase the amount remaining in the Level III storm accrual account monthly. AWEC's clarification to PGE's approach is reasonable because it minimizes administrative costs, minimizes the need for deferrals, and accurately captures the costs incurred by customers until base rates are adjusted in PGE's next general rate case. Given that alternative options exist, CUB is hesitant to support any of the deferral methods delineated in PGE's "Method 2".

Dated this 7<sup>th</sup> day of June, 2019.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael P. Goetz".

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