

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: December 18, 2017

REGULAR _____ CONSENT X EFFECTIVE DATE December 19, 2017

DATE: December 4, 2017

TO: Public Utility Commission

FROM: Rose Anderson *RA*

THROUGH: *Sela Sa* Jason Eisdorfer and *JE* John Crider

SUBJECT: PORTLAND GENERAL ELECTRIC: (Docket No. ADV 636/
Advice No. 17-21) Request to update Rule E pertaining to establishing
credit with PGE, deposits, and housekeeping updates.

STAFF RECOMMENDATION:

The Public Utility Commission (Commission) should approve the application by Portland General Electric Company (PGE or Company) requesting to update Rule E in its Tariff P.U.C. No 18, effective with service on and after December 19, 2017.

DISCUSSION:

Issue

Whether the Commission should approve PGE's Advice No. 17-21, requesting to make changes and additions to PGE's Rule E, including changes regarding establishing credit and treatment of deposits for nonresidential customers.

Applicable Rules, Orders and Statutes

PGE's request involves changes to tariff sheets, and approval of such changes is governed by ORS 757.205, ORS 757.210 and OAR 860-022-0025. The Commission may approve tariff changes if they are deemed to be fair, just and reasonable. ORS 757.210. Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly

indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

Filings that propose any change in rates, tolls, rules or regulations must be filed with the Commission at least 30 days before the effective date of the change pursuant to ORS 757.220 and OAR 860-022-0020. Tariff filings to be effective on less than 30 days following notice of the change may be authorized with a waiver of less than statutory notice.

Analysis

PGE filed its Advice No. 17-21 requesting to update Rule E on October 11, 2017, with a requested effective date of November 22, 2017. The proposed changes to Rule E included new language on privacy of nonresidential customers' financial information, revisions regarding the treatment and refunding of nonresidential deposits, and various housekeeping revisions.

Staff reviewed the Initial Filing and identified several concerns regarding ambiguity in the revised tariff and protections for PGE residential customers who might also have nonresidential accounts. PGE participated in phone conferences with Staff and filed a request for extension on November 9, 2017. On November 21, 2017, PGE filed replacement sheets and an application requesting a waiver of legal statutory notice in response to Staff's concerns.

To address Staff's concerns, PGE made the following changes to its Rule E revisions:

- PGE added language to clarify that PGE would not disclose financial information of a nonresidential customer without first obtaining the customer's permission, unless the Company in good faith believes such action is required for legal or safety purposes.
- PGE removed a list item under Establishing Credit to resolve Staff's concern that the list item introduced excessive ambiguity into the requirements for establishing credit.
- PGE clarified the tariff to reflect that PGE will only consider a customer's nonresidential account history when establishing credit for a nonresidential account.

Due to the requested effective date of December 19, 2017, and the less than 30 days-notice associated with the supplemental filing, PGE also submits an application requesting a waiver of legal statutory notice.

Staff reviewed all of the changes made by PGE in the Supplemental Filing. Staff finds that the changes are appropriate and sufficient to address Staff's concerns with the original filing. None of the changes to Rule E in PGE's Supplemental Filing affects customers' rates. Staff identified no issues or errors with the revised filing.

PGE has reviewed a copy of this memo and voiced no issues or concerns.

Conclusion

The Commission should approve the tariff changes as filed, allowing the revisions to go into effect with service on and after December 19, 2017.

PROPOSED COMMISSION MOTION:

Approve Portland General Electric Company's Advice No. 17-21, effective with service on and after December 19, 2017.