



Portland General Electric Company

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January 24th, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: UM 2217 - Portland General Electric Company's Response to Comments of Steve Knudsen

Dear Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric Company's Reply to Comments of Steve Knudsen.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KSB', is written over a light blue horizontal line.

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KMB:mb
PGE's Response

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2217

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for the Deferral of Revenues
Associated with the Change in Federal
Energy Regulatory Commission Open
Access
Transmission Tariff.

PORTLAND GENERAL ELECTRIC
COMPANY'S REPLY TO COMMENTS OF
STEVE KNUDSEN

On December 22, 2022, Portland General Electric Company filed an Application for Reauthorization to Defer Revenues Associated with the Change in Federal Energy Regulatory Commission Open Access Transmission Tariff (hereinafter, "Reauthorization Application"). PGE's Reauthorization Application specifically requested authority to continue deferring incremental revenue associated with revised rates for PGE's wholesale electricity transmission service. On January 13, 2023, F. Steven Knudsen, who identified himself as a PGE customer, submitted written comments and requested a hearing on PGE's Reauthorization Application. For the foregoing reasons, Mr. Knudsen's request should be denied, and PGE's Reauthorization Application should be approved.

BACKGROUND

In 2021, PGE filed a case with FERC to increase rates for its Open Access Transmission Tariff (OATT). Pursuant to the terms of a stipulation adopted by the Commission in Order No.

19-400,¹ PGE committed to hold all customer classes harmless for the time between the rate effective date for FERC and Oregon rate cases. To comply with PGE’s commitment and the Commission’s order, on December 27, 2021, PGE filed an application to defer revenues associated with the change in PGE’s FERC OATT.² Mr. Knudsen submitted written comments asserting that “PGE does not have the authority to file this deferral request with the OPUC and OPUC has no authority under ORS 757.259 to approve PGE’s Application for Deferral.”

Mr. Knudsen’s comment also stated, “[s]hould the Commission determine that I do not have standing to request such hearing because I am not a ‘party’ in UM 2217, I respectfully request that the Commission waive the requirement of ORS 757.259.” After Staff submitted a report recommending PGE’s initial deferral application be approved, the Commission took up the matter at its August 23, 2022 Public Meeting. After providing an opportunity for public comments, the Commission adopted Staff’s Recommendation in Order No. 22-311.

LACK OF STANDING TO REQUEST HEARING

Mr. Knudsen’s January 13, 2023 comments request a hearing under ORS 757.259(2), which states that “[u]pon application of a utility or ratepayer or upon the commission’s own motion and after public notice, opportunity for comment and a hearing *if any party requests a hearing*, the commission by order may authorize deferral of the following amounts for later incorporation in rates” (Emphasis added). As a ratepayer, Mr. Knudsen was provided an opportunity to submit comments as permitted by ORS 757.259(2). However, Mr. Knudsen is not a “party” and therefore lacks standing to request a hearing under the statute.

¹ Docket UM 2031.

² See Initial Application, December 27, 2021, Docket UM 2217.

Pursuant to OAR 860-001-0010(7), “party” means a person entitled as a matter of right to a hearing before the Commission, an intervenor, or Commission Staff. Mr. Knudsen’s comments do not assert he is entitled to a hearing as a matter of right. Furthermore, Mr. Knudsen, is not an intervenor in Docket UM 2217 and never filed a petition to intervene, as required by OAR 860-001-0300(2).

Notwithstanding the procedural issues with Mr. Knudsen’s comments, his position is substantively inaccurate. While Mr. Knudsen alleges in his January 13, 2023 comments that PGE’s Reauthorization Application fails to comply with the requirements of OAR 860-027-300 and does not provide any meaningful information upon which Staff can conduct an impartial prudence review, he disregards the explanations in Staff’s August 18, 2022 Report articulating why PGE’s deferral request complies with the requirements of ORS 757.259, OAR 860-27-0300, and Order No. 19-400.

WHEREFORE, PGE request the Commission deny Mr. Knudsen’s request for a hearing and approve the Reauthorization Application.

DATED this 24th day of January, 2023.

Respectfully submitted,



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