



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

December 22, 2022

via email

puc.filingcenter@puc.or.gov

Public Utility Commission of Oregon

Attn: OPUC Filing Center

201 High Street, Ste. 100

P. O. Box 1088

Salem, OR 97308-1088

Re: UM 2217 PGE's Application for Deferral of Revenues Associated with the Change in Federal Energy Regulatory Commission Open Access Transmission Tariff

Enclosed for filing is Portland General Electric Company's Application for Reauthorization of Deferral of Revenues Associated with the Change in Federal Energy Regulatory Commission Open Access Transmission Tariff.

A Notice regarding the filing of this application has been provided to the parties on the UE 394 and UM 2217 service lists.

Parties who wish to receive a copy of this Application should review the Public Utility Commission of Oregon (OPUC) website.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488 or Greg Batzler at (503) 464-8644. Please direct all formal correspondence, questions, or requests to the following e-mail address pge.opuc.filings@pge.com.

Sincerely,

A handwritten signature in cursive script that reads "Jaki Ferchland".

Jaki Ferchland
Manager, Revenue Requirement

JF:dm
Enclosure

cc: Service Lists UE 394 & UM 2217

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2217

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

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

**Application for Reauthorization to Defer
Revenues Associated with the Change in
Federal Energy Regulatory Commission
Open Access Transmission Tariff**

Pursuant to ORS 757.259, OAR 860-027-0300, and Commission Order No. 22-311 Portland General Electric Company (PGE) hereby requests reauthorization to defer revenues associated with the change in PGE’s Federal Energy Regulatory Commission (FERC) Open Access Transmission Tariff (OATT). In addition, this filing also requests reauthorization of an automatic adjustment clause rate schedule with an associated balancing account mechanism to track the ongoing revenue and refund amounts related to the FERC Transmission Rates. PGE requests that this deferral have an effective date of January 1, 2023 through December 31, 2023. In support of this Application PGE states:

1. PGE is a public utility in the state of Oregon and its rates, service and accounting practices are subject to regulation by the Public Utility Commission of Oregon (Commission or OPUC).
2. This application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items.
3. Written communications regarding this Application should be addressed to:

Kim Burton
Assistant General Counsel
Portland General Electric Company
1WTC1301
121 SW Salmon Street
Portland OR 97204
(573) 356-9688
kim.burton@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
1WTC0306
121 SW Salmon Street
Portland OR 97204
(503) 464-8172
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
Email

Manager, Revenue Requirement
jacquelyn.ferchland@pgn.com

I. OAR 860-027-0300(3) Requirements

The following is provided pursuant to OAR 860-027-0300(3):

A. Background Description

On August 29, 2019, PGE filed an application, Docket UM 2031, asking the Commission to support a proposal to reclassify as transmission assets, certain 115kV and 57 kV facilities that were classified as distribution plant at the time. Commission Order No. 19-400 directs that the Company “hold all customer classes harmless for the time between the rate effective date in FERC and Commission rate cases that include the reclassified assets.” PGE filed a FERC rate case on October 28, 2021 and is currently awaiting final approval of new rates. PGE’s initial application to defer all revenues resulting from the change in the OATT rate as authorized by Order No. 19-400 was approved through Commission Order No. 22-311 and the effective date of PGE’s new OATT was January 1, 2022. PGE has since reached a settlement on all issues in the FERC case and PGE has made an interim rate filing effective January 1, 2023, in order to update to the settled rates prior to and pending the final order from the FERC. As PGE’s most recently approved general rate case (Docket No. UE 394) continues to reflect forecasted revenues resulting from PGE transmission rates in effect prior to January 1, 2022, PGE requests reauthorization to continue to

defer incremental revenues associated with the change in FERC transmission rates, until such time that PGE can incorporate the impacts of PGE's revised transmission rates within base customer prices.

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks continued deferred accounting treatment for revenues associated with the change in the FERC OATT rate. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. The approval of the application will support the use of an automatic adjustment clause rate schedule and associated balancing account so that the referenced transmission revenues can be refunded to PGE's retail customers

C. Proposed Accounting for Recording Amounts Deferred.

PGE proposes the following transmission rate change accounting treatment: the balancing account will be recorded in FERC account 242 (Current Regulatory Liability). FERC rate payments (i.e., revenues received from third-party transmission customers) will be credited to FERC Account 242 and debited to FERC Account 407.4 (Regulatory Credit). Transmission rate amortization (i.e., refunds to PGE's retail customers) will be debited to FERC Account 242 and credited to FERC Account 407.4. Interest will accrue on the balance at the approved modified blended treasury rate.

D. Estimate of Amounts to be Recorded for the Next 12 months.

PGE estimates the change in transmission rate amount to refund applicable to calendar year 2023 to be approximately \$7.0 million.

E. Notice

A copy of the Notice of Application for Deferral of Revenues Associated with the change

in FERC OATT rate and a list of persons served with Notice are attached to the Application as Attachment A. In compliance with OAR 860-027-0300(6), PGE is serving Notice of Application on the UM 2217 and UE 394 Service Lists.

II. Summary of Filing Conditions

A. Earnings Review

Cost recovery associated with this deferral will not be subject to an earnings review since it is subject to an automatic adjustment clause.

B. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of this deferral's annual reauthorization filing.

C. Sharing

No sharing mechanism applies to the change in FERC transmission revenues.

D. Rate Spread/Rate Design

Applicable revenues will be allocated to each cost-of-service schedule using the applicable schedule's forecasted energy on the basis of an equal percent of transmission revenue applied on a cents-per-kWh basis.

E. Three percent test (ORS 757.259(6))

The amortization of the Pilot's deferred revenues will be subject to the three percent test in accordance with the 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.

III. Conclusion

For the reasons stated above, PGE requests approval to defer the revenues associated with the change in PGE's OATT effective as of the FERC approval date.

DATED this 22nd day of December 2022.

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company

121 SW Salmon St, 1WTC0306

Portland OR 97204

Telephone: 503.464.7488

E-Mail: jacquelyn.ferchland@pgn.com

Attachment A

Notice of Application for Reauthorization to Defer Revenues Associated with the Change in Federal Energy Regulatory Commission Open Access Transmission Tariff

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2217

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for an Order Approving the
Deferral of Revenues

**Notice of Application for
Reauthorization to Defer Revenues
Associated with the Change in Federal
Energy Regulatory Commission Open
Access Transmission Tariff**

On December 22, 2022, Portland General Electric Company (PGE) filed an Application with the Public Utility Commission of Oregon (the Commission or OPUC) for an Order authorizing deferral of revenues associated with the change in PGE’s Federal Energy Regulatory Commission Open Access Transmission Tariff.

Approval of PGE’s Application as proposed will support the use of an automatic adjustment clause rate schedule and balancing account to reflect the incremental revenues associated with the FERC transmission rates.

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

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than January 16, 2023.

Dated this 22nd day of December 2022.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: jacquelyn.ferchland@pgn.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application for Reauthorization to Defer Revenues Associated with the Change in Federal Energy Regulatory Commission Open Access Transmission Tariff** to be served by electronic mail to those parties on the attached service list for OPUC Docket Nos. UM 2217 and UE 394.

Dated at Portland, Oregon, this 22nd day of December, 2022.

/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: jacquelyn.ferchland@pgn.com

Service List
OPUC Docket 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 MILINOVICH (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY, STE. 450 PORTLAND OR 97201 com@dvclaw.com
TYLER C PEPPE (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

Service List
OPUC Docket UE 394

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

Service List
OPUC Docket UE 394

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

STEVE W CHRISS (C)
WALMART STORES INC

2001 SE 10TH ST
BENTONVILLE AR 72716-0550
stephen.chriss@wal-mart.com

Service List
OPUC Docket UM 2217

STEPHANIE S ANDRUS
Oregon Department of Justice

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

CURTIS DLOUHY
PUBLIC UTILITY COMMISSION OF
OREGON

PO BOX 1088
SALEM OR 97308-1088
curtis.dlouhy@puc.oregon.gov

JAKI FERCHLAND
PORTLAND GENERAL ELECTRIC

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

STEVE KNUDSEN
NO BUSINESS NAME

2018 SE SALMON ST
PORTLAND OR 97214
steve@threeboys.com

LORETTA I MABINTON
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST - 1WTC1711
PORTLAND OR 97204
loretta.mabinton@pgn.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