



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

December 26, 2019

Email

puc.filingcenter@state.or.us

Public Utility Commission of Oregon
201 High Street, Ste. 100
P. O. Box 1088
Salem, OR 97308-1088

Attn: OPUC Filing Center

Re: UM _____ PGE's Application for Authorization to Defer Costs Associated with an Increase in the Annual Regulatory Fee

Enclosed for filing is Portland General Electric Company's ("PGE") Application for Authorization to Defer Costs Associated with an Increase in the Annual Regulatory Fee pursuant to ORS 756.310.

A Notice regarding the filing of this application has been provided to the parties on the PGE's last general rate case service list (UE 335).

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7805.

Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

A handwritten signature in blue ink that reads "Jaki Ferchland". The signature is written in a cursive, flowing style.

Jaki Ferchland
Manager, Revenue Requirement

JF/np

Enclosure
cc: Service List: UE 335

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of the Application of Portland) **Application for the Deferral of Costs**
General Electric Company for an Order) **Associated with an Increase in the Annual**
Approving the Deferral of Costs Associated) **Regulatory Fee**
with an Increase in the Annual Regulatory Fee)

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (“PGE”) respectfully requests a Public Utility Commission of Oregon (“Commission” or “OPUC”) order authorizing PGE to defer, for later rate-making treatment, the costs associated with an increase in the annual regulatory fee allowed by ORS 756.310 (“Deferred Amount”). PGE requests this deferral to be effective January 1, 2020 and be subject to annual renewals until the fee rate is incorporated into PGE’s next general rate case.

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 the regulation of the 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:

Douglas C. Tingey
Associate General Counsel
Portland General Electric
1 WTC 1301
121 SW Salmon Street
Portland, OR 97204
Phone: 503.464.8926
E-mail: doug.tingey@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric
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121 SW Salmon Street
Portland, OR 97204
Phone: 503.464.7805
E-mail: 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:

Alex Tooman, Senior Regulatory Consultant, Regulatory Affairs
E-mail: Alex.Tooman@pgn.com

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

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

A. Background Description

On May 24, 2019, Oregon Governor Kate Brown signed Senate Bill 68 (SB 68), which revises ORS 756.310 to allow the annual regulatory fee that is imposed on public utilities and telecommunications providers, for purpose of defraying costs of the OPUC, to increase from 0.3% to 0.45%. In accordance with ORS 756.310, the Commission will issue an order on or after March 1, 2020 to specify the percentage rate of the fee required to be paid by public utilities for the current year, based on the utilities' gross operating revenues derived within Oregon in the preceding calendar year. Because PGE expects that the Commission will implement the fee increase and because the increase will apply to 2020 remittances to the Commission, PGE requests authorization to defer for later rate making treatment, the costs associated with an expected increase in the OPUC fee from 0.3% up to 0.45%.

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks deferred accounting treatment for costs associated with an expected increase in the annual regulatory fee, effective January 1, 2020. As mentioned above, the imposition of this fee will occur in early 2020 and be applicable for the full year, thus PGE is unable to include it within a prior or existing rate

proceeding. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers.

C. Proposed Accounting for Recording Amounts Deferred.

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 456 (Other Revenue). Absent Commission approval of this application, PGE will record the incremental cost in FERC account 928 (Regulatory Commission Expense).

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

PGE estimates that the amount to be deferred would be approximately \$3.0 million dollars if the Commission authorizes a regulatory fee increase up to the maximum 0.45% allowable by ORS 756.310.

E. Notice

A copy of the Notice of Application for Deferral of Costs Associated with an Increase in the Annual Regulatory Fee and a list of persons served with the Notice are attached to this Application as Attachment A. In compliance with OAR 860-027-0300(6), PGE is serving Notice of Application on the UE 335 Service List, PGE's last general rate case.

II. Summary of Filing Conditions

A. Earnings Review

Recovery of the incremental regulatory fee will be subject to an earnings review in accordance with ORS 757.259(5).

B. Prudence Review

A prudence review should be performed as part of the amortization filing.

C. Sharing

All prudently incurred costs are to be recoverable by PGE with no sharing mechanism.

D. Rate Spread/Rate Design

The rate spread/rate design will be consistent with the prevailing rate spread/rate design at the time of the amortization.

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

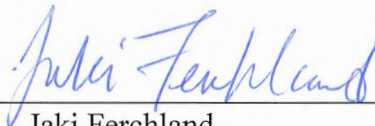
The amortization of the deferred costs will be subject to the three percent test in accordance with the ORS 757.259(7) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

III. Conclusion

For the reasons stated above, PGE requests permission to defer the costs related to the Oregon Corporate Activities Tax from the date of this application.

DATED this 26th day of December, 2019.

Respectfully Submitted,



Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
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Portland, OR 97204
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E-Mail: jacquelyn.ferchland@pgn.com

UM XXXX

Attachment A

**Notice of Application for Deferral of Costs
Associated with an Increase in the Annual Regulatory Fee**

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM _____

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs Associated with an Increase in the Annual Regulatory Fee) **Notice of Application for the Deferral of Costs Associated with an Increase in the Annual Regulatory Fee**

On December 26, 2019, Portland General Electric Company (“PGE”) filed an Application with the Public Utility Commission of Oregon (“Commission” or “OPUC”) for an Order authorizing deferral of costs associated with an increase in the Annual Regulatory Fee allowed by ORS 756.310.

Approval of PGE’s Application will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

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 27th, 2019.

Dated this 26th day of December, 2019.



Jaki Ferchland
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Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application for Deferral of Costs Associated with an Increase in the Annual Regulatory Fee** allowed by ORS 756.310, to be served by electronic mail on those parties whose email addresses appear in the attached service list for OPUC Docket No. UE 335.

Dated at Portland, Oregon, this 26th day of December, 2019.



Jaki Ferchland

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