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August 16, 2018

via E-Mail
puc.filingcenter@state.or.us

Public Utility Commission of Oregon
201 High St. SE, Suite 100
PO Box 1088
Salem, OR 97308-1088

Attention: OPUC Filing Center:

RE: UM ____ PGE's Application for Deferral

Enclosed for filing is Portland General Electric Company's ("PGE") Application for Deferred Accounting Treatment of Certain Third-Party Consulting Costs Associated with the Request for Proposal for Renewable Resources (involving an independent variable energy resource assessment expert and third party owner's engineer).

A Notice regarding the filing has been provided electronically to the parties on the UE 335, LC 66, and UM 1934 service lists.

Parties who wish to obtain a copy of PGE's application will be able to access it on the Commission Website.

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, appearing to read "Stefan Brown", is written over the word "Sincerely,".

Stefan Brown
Manager, Regulatory Affairs

encls.

cc: Service Lists: UE 335, LC 66, and UM 1934

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 Certain Third-Party Consulting
Costs Associated with the Request For
Proposal for Renewable Resources**

**Application for Deferred Accounting
Treatment of Certain Third-Party Consulting
Costs Associated with the Request For Proposal
for Renewable Resources**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (“PGE”) hereby requests authorization to defer for later rate-making treatment certain design, implementation, evaluation and report expenses associated with its 2018 renewable resources Request for Proposals (“RFP”), currently docketed as UM 1934. PGE will seek amortization of the deferred amount in a future proceeding. In support of this Application, PGE states:

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

PGE-OPUC Filings
Rates & Regulatory Affairs
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121 SW Salmon Street
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Phone: 503.464.7805
E-mail: pge.opuc.filings@pgn.com

Loretta Mabinton
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In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Stefan Brown, Manager, Regulatory Affairs
E-mail: stefan.brown@pgn.com

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

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

A. Background

To provide guidelines for developing Integrated Resource Plans (“IRP”) and RFPs, the Commission has issued the following orders:

- Order No. 18-145 updated the Commission’s planning principles and analysis guidelines for IRPs. Consistent with this Order, the objective of PGE’s IRP process is to identify new electric generation, demand-side, and transmission resources which, when considered with our existing portfolio, provide the best combination of least-cost and associated risks for PGE and our customers.
- Order No. 06-446 adopted Competitive Bidding Guidelines, which require utilities to issue an RFP for all major resource acquisitions, (i.e., those with durations greater than five years and quantities greater than 100 MW).
- Order No. 13-204 requires the use of an independent third-party wind assessment expert to review the capacity factors of all wind resource bids.

In compliance with Order Nos. 06-446 and 13-204, PGE has executed agreements with the following third-party consultants to participate in the process to evaluate PGE’s 2018 renewable resource RFP:

- Vaisala has been retained to review and assess the short-listed proposals received for wind and solar bids. This includes the review and assessment of the Variable

Energy Resource (VER) estimate, resource study, and other resource data describing the estimated energy produced from each project proposal.

- Burns and McDonnell has been retained to provide Owner Engineer professional services to conduct technical compliance review of short listed proposals received for renewable energy bids. This includes analysis of the technical exception log submitted with each utility-owned proposal, identification of any additional technical scope gaps, and cost estimation for any identified technical exceptions.

PGE requests deferred accounting to track the costs of the VER expert and the third-party owner's engineer who will support the evaluation of the RFP bids for later prudency review and inclusion in rates.

B. Reasons for Deferral

For the reasons stated above, PGE expects to incur costs associated with the VER expert and owner's engineer that were not included in the costs used to set rates in PGE's most recent general rate cases (Docket Nos. UE 319 and UE 335), and, therefore, requests deferred accounting to track these costs for later prudency review and potential inclusion in rates.

PGE also seeks deferred accounting treatment of these potential expenses pursuant to ORS 757.259(2)(e). Deferring the costs will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. Approving this application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

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 407.4, Regulatory Credits. In the absence

of a deferred accounting order from the Commission, PGE would record the costs associated with the wind expert and owner's engineer to FERC account 923, Outside Services Employed.

D. Estimate of Amounts to be recorded for the next 12 months.

PGE currently estimates the amount subject to the deferral will be approximately \$100,000 for the VER expert and owner's engineer. However, the actual amount will depend on the amount of work performed by the renewal energy assessment expert and owner's engineer.

E. Notice.

A copy of the notice of application for deferred accounting treatment and a list of persons served with the notice are attached to the application as Attachment A. In compliance with the provisions of 860-027-0300(6), PGE is serving Notice of Application on the UE 335 Service List, PGE's last general rate case, LC 66 and UM 1934.

II. Summary of Filing Conditions:

A. Earnings Review: (ORS 757.259(5)) - Not applicable. See Commission Order No. 06-446, Appendix A, Page 1. The Commission adopted Competitive Bidding Guidelines that require utilities to issue a Request for Proposal for all major resource acquisitions, and also the use an independent third-party VER assessment expert in each RFP with wind resource bids.

B. Prudence Review: Should be performed by the Public Utility Commission of Oregon Staff after PGE files for amortization but should be limited to verification of the accounting methodology used to determine the final amortization balance.

C. Sharing Percents: There should be no sharing between PGE and its customers for this deferral. PGE is incurring the costs in this deferral application in order to comply with Commission Guidelines set forth in Order Nos. 06-446 and 13-204 related to the evaluation and consideration of RFPs for major renewable resources.

D. Rate Spread/Rate Design: Costs recovered through this deferral will be allocated to each schedule using the applicable schedule's forecasted energy on the basis of an equal percent of generation revenue applied on a cents per kWh basis to each applicable rate schedule.

E. Three Percent Test: The amortization of these deferred costs will be subject to the three percent test in accordance with ORS 757.259(6), 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 certain expenses associated with an independent VER assessment expert and the third-party owner's engineer as described herein from the date of this application.

DATED this 16th day of August 2018.



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UM _____

Attachment A

**Notice Of Application For Deferred Accounting
Treatment of Certain Third-Party Consulting Costs Associated with
the
Request For Proposal for Renewable Resources**

**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 Certain Third-Party Consulting
Costs Associated with the Request For
Proposal for Renewable Resources**

**Notice of Application for Deferred
Accounting Treatment of Certain
Third-Party Consulting Costs Associated
with the Request For Proposal for
Renewable Resources**

On August 16, 2018, Portland General Electric Company (“PGE”) filed an application with the Public Utility Commission of Oregon (the “Commission”) for an Order authorizing deferral of certain expenses associated with a Variable Energy Resource Assessment Expert and Third-Party Owner’s Engineer for the Request For Proposal for Renewable Resources. 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 Commission website.

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than September 17, 2018.

Dated this 16th day of August 2018.



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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the Notice of Application for Deferred Accounting Treatment of Certain Third-Party Consulting Costs Associated with the Request For Proposal for Renewable Resources to be served by electronic mail to those parties whose email addresses appear on the attached service list to those parties on the attached service list for OPUC Dockets UE 335, LC 66, and UM 1934.

Dated at Portland, Oregon, this 16th day of August, 2018.



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**OPUC DOCKET UE 335
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