



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

December 10, 2019

via email

puc.filingcenter@state.or.us

Public Utility Commission of Oregon
Attn: OPUC Filing Center
201 High Street, Suite 100
P. O. Box 1088
Salem, OR 97308-1088

Re: UM _____ - PGE's Amended Application for Reauthorization to Defer Costs to Support PGE's Use of the Balancing Account Associated with the Energy Efficiency Customer Service

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's ("PGE") Amended Application for Reauthorization to Defer Costs to Support PGE's Use of the Balancing Account Associated with the Energy Efficiency Customer Service pursuant to OPUC Order No. 19-020.

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 black ink, appearing to read "Jaki Ferchland". The signature is written in a cursive, flowing style.

Jaki Ferchland
Manager, Revenue Requirement

JF/lh

Encls.

cc: Service List: UE 335 and UM 1986

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM XXXX

In the Matter of the Application of Portland)
General Electric Company for an Order) Amended Application for Reauthorization to
Approving the Deferral of Costs to Support) Defer Costs to Support PGE’s Use of the
PGE’s Use of the Energy Efficiency Customer) Energy Efficiency Customer Service Balancing
Service Balancing Account) Account

Pursuant to ORS 757.259 and OAR 860-027-0300, and Commission Order 19-020, Portland General Electric Company (PGE) hereby requests reauthorization to defer certain costs associated with PGE’s balancing account for the Energy Efficiency (EE) Customer Service that is amortized through Schedule 110. PGE’s initial application for this deferral was submitted as part of Docket No. UM 1986 (UM 1986) and was approved by Commission Order No. 19-020. In its November 4, 2019 filing to reauthorize the EE Customer Service deferral, however, PGE inadvertently submitted it again as part of UM 1986 along with the request to reauthorized deferred accounting for the Multnomah County Business Income Tax (MCBIT) Recovery. Because this was contrary to directions from Commission Order No. 19-020, PGE is amending the November 4th application to separate the two deferral reauthorizations such that MCBIT only will be filed in UM 1986 and EE Customer Service will be filed under a separate docket. Because this is a resubmission of the request to reauthorize the EE Customer Service deferral, we submit it as an amended filing with an effective date of December 7, 2019 through December 6, 2020.

I. Deferral History

This application (Application) is filed pursuant to Commission Order 19-020 and at the direction of Public Utility Commission of Oregon (OPUC or Commission) Staff in its

interpretation that deferred accounting needs to be authorized to support balancing accounts that are used to record the activity of certain Commission-approved mechanisms.

PGE requests this deferral have an effective date of December 7, 2019 and be subject to annual renewals as long as the EE Customer Service balancing account is in place. PGE will not seek amortization of these deferred amounts in a future proceeding as the deferred amounts will automatically reverse due to the standard operation of the approved EE Customer Service mechanism. In short, approval of this application will permit PGE to continue using the established EE Customer Service balancing account mechanism as approved by the OPUC. In accordance with prior Commission Orders, amounts in the EE Customer Service balancing account will continue to roll forward and can have either positive or negative (i.e., debit or credit) balances. Section A below provides further details regarding PGE's EE Customer Service balancing account.

II. OAR 860-027-0300 Requirements

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

a. Description of Utility Expense for Which Deferred Accounting is Requested

See Deferral History above. In prior regulatory filings PGE proposed and the Commission approved PGE to establish a balancing account for recording costs and revenues related to EE Customer Service. Specifically, PGE established a balancing account to record the differences between the actual fully loaded qualifying expenses¹ to fund PGE activities associated with enabling customers to achieve energy efficiency and the revenues collected under Schedule 110 adjusted for allowance for uncollectibles, franchise fees, and other revenue sensitive costs.

¹ The expenses include but are not limited to project facilitation, technical assistance, education and assistance to support programs administered by the Energy Trust of Oregon.

In compliance with Commission Order No. 19-020 and at the OPUC Staff's direction, PGE submits this Application to support the balancing account and to address the occasions when there is any variance - positive or negative – between expenses incurred and revenues collected that is rolled forward within the EE Customer Service balancing account.

b. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks to continue deferred accounting treatment for costs associated with EE Customer Service to support the use of related balancing account. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. Approving the Application will not authorize a change in rates but will permit PGE to continue using the EE Customer Service balancing account as intended and approved through prior Commission orders.

c. Proposed Accounting for Recording Amounts Deferred

The EE Customer Service balancing account is recorded in either FERC 182.3 (Regulatory Assets), when qualified expenses incurred exceed revenue collected from customers, or FERC Account 254 (Regulatory Liabilities) when qualified expenses incurred are less than revenue collected from customers. PGE amortizes the balancing account based on the rate collected from customers through Schedule 110, adjusted by revenue sensitive costs.

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

PGE does not have an estimate of the amounts to be deferred because they occur infrequently and can vary depending on the level of expenses and revenues or the accuracy of projections.

e. Notice

A copy of the Notice of Application for Deferral of Costs to Support PGE's Energy Efficiency Balancing Account 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 UE 335 Service List, PGE's last general rate case.

III. The following is provided pursuant to OAR-027-0300 (4)

a. Description of Deferred Account Entries

Please see sections II(a) and II(c) above.

b. The Reason for Continuing Deferred Accounting

PGE seeks approval to continue deferred accounting treatment for costs associated with the EE Customer Service balancing account.

Without reauthorization this deferral will expire on December 6, 2019.

IV. Summary of Filing Conditions

a. Earnings Review

No earnings review is applicable as PGE will not seek separate amortization of the deferred amounts in a future proceeding because all associated costs and revenues will continue to flow through the established balancing accounts.

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of PGE's general rate case filings.

c. Sharing Percentages

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

d. Rate Spread/Rate Design

Rate Spread/Rate Design is not applicable since PGE will not seek amortization of the deferred amounts in a future proceeding because all associated costs and revenues will continue to flow through the established balancing account.

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

The three percent test would not apply because PGE will not seek amortization of the deferred amounts in a future proceeding.

V. PGE Contacts

Written communications regarding this Application should be addressed to:

Douglas C. Tingey	PGE-OPUC Filings
Associate General Counsel	Rates & Regulatory Affairs
Portland General Electric	Portland General Electric
1 WTC1301	WTC 0306
121 SW Salmon Street	121 SW Salmon Street
Portland, OR 97204	Portland, OR 97204
Phone: 503.464.8926	Phone: 503.464.7805
E-mail: doug.tingey@pgn.com	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:

Stefan Cristea, Senior Regulatory Analyst, Regulatory Affairs
E-mail: stefan.cristea@pgn.com

a. Conclusion

For the reasons stated above, PGE requests permission to defer the costs related to the EE Customer Service balancing account including any amounts that roll forward into its balancing account calculations.

DATED this 10th day of December, 2019.

Respectfully Submitted,



Jaki Ferchland
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UM 1986

Attachment A

Notice of Amended Application for Reauthorization to Defer Costs to Support PGE's Use of the Energy Efficiency Customer Service Balancing Account

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1986

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs to Support PGE's Use of the Energy Efficiency Customer Service Balancing Account) **Notice of Amended Application for Reauthorization to Defer Costs to Support PGE's Use of the Energy Efficiency Customer Service Balancing Account**

On December 10, 2019, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission or OPUC) for an Order reauthorizing deferral of costs to support PGE's use of the established balancing account for the Energy Efficiency (EE) Customer Service.

Approval of PGE's Application will not authorize a change in PGE's rates, but will permit PGE to continue using the EE Customer Service balancing account mentioned above as approved through prior Commission Orders.

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 10, 2019.

Dated this 10th day of December, 2019.

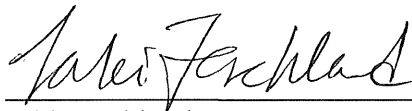


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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the Notice of Application for Reauthorization to Defer Costs to Support PGE's Use of the Energy Efficiency Customer Service Balancing Account to be served by electronic mail to those parties on the attached service list for OPUC Docket No. UE 335.

Dated at Portland, Oregon, 10th day of December, 2019.



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