



Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

December 27, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

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

Filing Center:

Pursuant to ORS 757.259 and OAR 860-027-0030, Portland General Electric Company (PGE) hereby requests authorization to defer certain revenues associated with the Change in PGE's 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 service list.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488.

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

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

JF/np
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for an Order Approving the
Deferral of Revenues

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

Pursuant to ORS 757.259 and OAR 860-027-0300 Portland General Electric Company (PGE) hereby requests an accounting order authorizing PGE to defer revenues associated with the change in PGE's Federal Energy Regulatory Commission (FERC) Open Access Transmission Tariff (OATT). In addition, this filing is being made to initiate a deferral that will support 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 be effective as of the date PGE's OATT rate is approved by FERC. 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:

Loretta Mabinton
Associate General Counsel
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Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric
121 SW Salmon Street
Portland, OR 97204
Phone: 503.464.7488
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 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. PGE filed this application to track all revenues resulting from the change in the OATT rate as authorized by Order No. 19-400. PGE is subject to refund this amount beginning rate effective date of the new OATT, with the current estimate expected to total approximately \$10.2 million annually. PGE has not otherwise included any forecast or estimate of the change in transmission revenue in customer prices through a general rate case or any other proceeding.

To address the new transmission rates as determined in FERC rate case, PGE requests approval to defer incremental revenues associated with the change in FERC transmission rates.

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks deferred accounting treatment for revenues associated with the change in the FERC OATT rate. The approval of this Application will support the use of an automatic adjustment clause and associated balancing account so that the referenced transmission revenues can be refunded to PGE's retail customers. 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 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 during 2022 to be approximately \$10.2 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 UE 394 Service List, PGE's current general rate case.

II. Summary of Filing Conditions

A. Earnings Review

Cost recovery associated with this deferral will not be subject to an earnings review since it would be 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.

IV. 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 27th day of December 2021.

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company

121 SW Salmon St, 1WTC0306

Portland OR 97204

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E-Mail: jacquelyn.ferchland@pge.com

Attachment A

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

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for an Order Approving the
Deferral of Revenues

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

On December 27, 2021, 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 27, 2021.

Dated this 27th day of December 2021.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application for the Deferral of 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 No. UE 394.

Dated at Portland, Oregon, this 27th day of December, 2021.

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

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