



Portland General Electric
121 SW Salmon Street • Portland, Ore. 97204
PortlandGeneral.com

June 7, 2019

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

RE: Portland General Electric Company's Reply to AWEC Response to the Administrative Law Judge's Bench Request issued May 24, 2019.

Dear Filing Center:

Please find enclosed Portland General Electric Company (PGE) reply to Alliance of Western Energy Consumers' (AWEC) response submitted in the above-referenced docket.

Please direct all formal correspondence, questions, or request to the following email address:
pge.opuc.filings@pgn.com.

Sincerely,

A handwritten signature in black ink that reads "Jay Tinker". The signature is written in a cursive, flowing style.

Jay Tinker
Director, Rates & Regulator Affairs

June 7, 2019

TO: Alison Lackey
Oregon Public Utility Commission

FROM: Jay Tinker
Director, Regulatory Policy and Affairs

**PORTLAND GENERAL ELECTRIC
UM 1817
PGE Reply to AWEC Response to OPUC Bench Request
Dated June 7, 2019**

Request:

The Parties may file replies by close of business, Friday, June 7, 2019.

Response:

In reply to AWEC's initial discussion regarding an adjustment to base prices (see page 2 of AWEC's response):

- PGE Exhibit 200, page 18, line 18 through page 19, line 5 did not propose to reduce PGE's current storm accrual by \$100,000. This minimal reduction would not have an impact on base prices.
- AWEC's attendant proposal for a minimum funding level is unclear as to how the minimum balance would eventually be amortized.
- Given the ambiguity, PGE would prefer to not employ this AWEC proposal. Instead we believe that the \$100,000 is minimal enough that it can remain in the accrual and not result in an annual regulatory process.

In reply to AWEC's subsequent discussion regarding tracking the overcollection in a separate account (see pages 2-4 of AWEC's response):

- PGE agrees that a deferral would begin effective with the Commission's order in this docket.
- PGE agrees that a gross-up for revenue sensitive costs is appropriate.
- The interest rate would depend on which of the three deferral methods the Commission were to choose from PGE's response dated May 31, 2019. PGE applies the interest monthly on the prior balance (i.e., compounded).

- PGE agrees that Schedule 105 would be a likely means to refund a deferred amount.
- PGE agrees that if the deferral method is chosen, then the annual credit will continue until the effective date of PGE's next general rate case.