

December 12, 2016

via E-Mail / US 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: Commission Filing Center:

RE: UM 1417 PGE's Application for Reauthorization of Deferral of Revenues
Associated with the Sales Normalization Adjustment and Lost Revenue Recovery

Enclosed for filing is Portland General Electric Company's ("PGE") Application for Reauthorization of Deferral of Revenues Associated with the Sales Normalization Adjustment and Lost Revenue Recovery. PGE received authorization pursuant to OPUC Order No. 16-039.

A Notice of Application regarding the filing of this application will be sent electronically to those parties on the UE 294 and UM 1417 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at 503-464-8929 or Marc Cody at 503-464-7434.

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

Sincerely.

Stefan Brown

Manager, Regulatory Affairs

encls.

cc: Judy Johnson, OPUC Bob Jenks, CUB

Brad Van Cleve, ICNU

Service List: UE 294 and UM 1417

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### UM 1417

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Revenues Associated with the Sales Normalization Adjustment and Lost Revenue Recovery Application for Reauthorization of Deferral of Revenues Associated with the Sales Normalization Adjustment and Lost Revenue Recovery

Pursuant to ORS 757.259, OAR 860-027-0300, and Public Utility Commission of Oregon ("Commission") Order No. 15-019, Portland General Electric Company ("PGE") hereby requests reauthorization to defer for later rate-making treatment revenues associated with the Sales Normalization Adjustment ("SNA") and Lost Revenue Recovery Adjustment Mechanism ("LRRA"), implemented through Schedule 123 ("Decoupling adjustment"). PGE requests this reauthorization commence effective January 1 through December 31, 2017.

## I. Deferral History

In Docket No. UE 262 (OPUC Order No. 13-459), the Commission approved the extension of PGE's SNA and LRRA mechanisms through 2016. Subsequently, the Commission approved extending these mechanisms beginning January 2017 through January 2019, (Order No. 16-359).

PGE filed and received reauthorizations for this deferral as shown in Table 1 below.

Table 1

Filing Date	Renewal Period	Order No.	Approval Date
1/30/09	2/01/09 - 1/31/10	09-162	05/06/09
1/20/10	2/01/10 - 1/31/11	10-077	03/02/10
1/20/11	2/01/11 - 1/31/12	11-110	04/07/11
1/20/12	2/01/12 - 12/31/12	12-075	03/07/12
12/31/13	1/01/13 - 12/31/13	13-044	02/12/13

12/19/14	1/01/14 - 12/31/14	14-020	01/22/14	
12/30/14	1/01/15 - 12/31/15	15-019	01/28/15	<del></del>
12/22/15	1/01/16 - 12/31/16	16-039	1/26/16	

## II. OAR 860-027-0300 Requirements

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

## a. <u>Description of Amounts</u>

The 2016 deferral amounts are not yet available. They will be calculated in the first quarter of 2017. The decoupling mechanism provides for customer collection or refund if Schedule 7 and Schedule 32 weather adjusted use per customer is less than or more than that approved in PGE's most recent general rate case (UE 294).

#### b. Reasons for Deferral

PGE seeks reauthorization to defer revenues associated with the SNA and LRRA mechanisms (Schedule 123). Without the reauthorization, this deferral will expire on December 31, 2016. The continuation of the deferral will minimize the frequency of rate changes or fluctuations pursuant to ORS 757.259(e), or match appropriately the costs borne by and benefits received by customers.

PGE expects any deferred amount to be recovered or refunded in a manner approved by the Commission and consistent with the terms of Schedule 123.

# c. Proposed Accounting

PGE proposes to continue the use of two separate accounts for the SNA mechanism and a separate account for the LRRA mechanisms. For each mechanism, we propose to record the deferred amounts to FERC account 182.3 (Regulatory Assets) if the deferred amount is to be collected from customers or FERC account 229 (Accumulated Provision for Rate Refunds) if the

deferred amount is to be refunded to customers. The corresponding credit or debit for the SNA and LRRA accounts is to FERC account 456 (Other Revenue) or FERC account 449.1 (Provision for Rate Refunds), respectively. In the absence of a deferred accounting order from the Commission, PGE would record the revenues associated with the two deferred accounts in FERC accounts 440 (Residential Sales), and 442 (Commercial/Industrial Sales).

## d. Estimate of Amounts

The amounts to be deferred pursuant to the SNA and LRRA mechanisms will be determined as described in Schedule 123, which for the SNA is the difference between actual, weather adjusted usage per customer during the deferral period and the usage per customer projected in UE 294 pursuant to PGE's Schedule 123. The LRRA difference is based on cumulative energy efficiency savings as reported by the ETO and savings incorporated in the applicable load forecast. Subsequently, interest will accrue at the interest rate set by the Commission for deferred amortizations.

#### e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with the Notice are attached to the Application as Attachment A.

# III. The following is provided pursuant to OAR 860-027-0300(4):

## a. <u>Description of deferred account entries</u>

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

## b. The reason for continuing deferred accounting

PGE seeks approval to continue to defer revenues associated with the SNA and the LRRA mechanisms (Schedule 123) between January 1 and December 31, 2017 as described in II (b) above. Without reauthorization this deferral will expire on December 31, 2016.

## IV. PGE Contacts

The authorized addresses to receive notices and communications in respect to this Application are:

Douglas C. Tingey Associate General Counsel Portland General Electric 1 WTC1301 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

1 WTC 0306

121 SW Salmon Street Portland, OR 97204

Phone: 503.464.8929

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

# V. Summary of Filing Conditions

## a. Earnings Review

An earnings review is required prior to amortization, pursuant to ORS 757.259(5).

## b. Prudence Review

A prudence review is a requirement of an earnings review, and should include a verification of the accounting methodology used to determine the final amortization balance.

#### c. Sharing

The SNA and LRRA amortizations will be collected from or refunded to customers with no sharing mechanism.

## d. Rate Spread/Rate Design

The SNA and LRRA amortizations will be spread as specified in Schedule 123.

#### e. Three Percent Test (ORS 757.259(6))

The three percent test measures the annual overall average impact on customer rates resulting from deferral amortizations. The three percent test limits (exceptions at ORS 757.259(7) and (8)) the aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year. ORS 757.259(8) allows the Commission to consider up to a six percent limit. The limit of these deferrals if any will be determined at the time of amortization.

## VI. Conclusion

For the reasons stated above, PGE requests permission to continue to defer for later ratemaking treatment revenues associated with the SNA and LRRA recovery mechanisms effective January 1 through December 31, 2017.

DATED: December 12, 2016.

Respectfully Submitted,

Stefan Brown

Manager, Regulatory Affairs

Portland General Electric Company 121 SW Salmon Street, 1WTC0306

Portland, OR 97204

Telephone:

503.464.8929

Fax:

503.464.8929

E-Mail:

pge.opuc.filings@pgn.com

um 1417\_pge def app reauth\_notice and cos\_12-09-16.docx

# UM 1417

# Attachment A

Notice of Application for Reauthorization of Deferral of Revenues Associated with the Sales Normalization Adjustment (SNA) and Lost Revenue Recovery (LRRA)

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### OF OREGON

#### UM 1417

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Revenues Associated with the Sales Normalization Adjustment and Lost Revenue Recovery Notice of Application for Reauthorization of Deferral of Revenues Associated with the Sales Normalization Adjustment and Lost Revenue Recovery

On December 12, 2016, Portland General Electric Company (PGE) filed an Application for Reauthorization of Deferral of Revenues Associated with the Sales Normalization Adjustment and/or Lost Revenue Recovery with the Public Utility Commission of Oregon ("Commission").

Approval for deferred accounting treatment 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 13, 2017.

Dated: December 12, 2016.

Stefan Brown

Manager, Regulatory Affairs

Portland General Electric Company

121 SW Salmon Street, 1WTC0306

Portland, OR 97204

Telephone: 503.464.8929

Facsimile: 503.464.7651

E-Mail:

pge.opuc.filings@pgn.com

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused UM 1417 Application For Reauthorization of Deferral of Revenues Associated with the Sales Normalization Adjustment and Lost Revenue Recovery to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UM 1417 and UE 294.

DATED at Portland, Oregon, this 12<sup>th</sup> day of December 2016.

Stefan Brown

Manager, Regulatory Affairs

Portland General Electric Company

121 SW Salmon St., 1WTC0306

Portland, OR 97204

Telephone: 503-464-8929

Facsimile: 503-464-7651

E-Mail:

pge.opuc.filings@pgn.com

# OPUC Docket No. UE 294 SERVICE LIST

Judy Johnson (C)	Johanna Riemenschneider (C)		
PUBLIC UTILITY COMMISSION OF OREGON	PUC – DEPARTMENT OF JUSTICE		
judy.johnson@state.or.us	Johanna.riemenschneider@state.or.us		
Douglas C. Tingey (C)	Jay Tinker (C)		
PORTLAND GENERAL ELECTRIC COMPANY	PORTLAND GENERAL ELECTRIC COMPANY		
doug.tingey@pgn.com	pge.opuc.filings@pgn.com		
OPUC Docket	Robert Jenks (C)		
CITIZENS' UTILITY BOARD OF OREGON	CITIZENS' UTILITY BOARD OF OREGON		
dockets@oregondub.org	bob@oregoncub.org		
Jody Cohn	Greg Bass		
BOEHM KURTZ & LOWRY	NOBLE AMERICAS ENERGY SOLUTIONS		
jkyler@bkllawfirm.com	gbass@noblesoultions.com		
Kevin Higgins (C)	Gregory Adams		
ENERGY STRATEGIES LLC	RICHARDSON ADAMS PLLC		
khiggins@energystrat.com	greg@richardsonadams.com		
S Bradley Van Cleve (C)	Tyler C. Pepple (C)		
DAVISON VAN CLEVE PC	DAVISON VAN CLEVE PC		
<u>bvc@dvclaw.com</u>	tep@dvclaw.com		
Bradley Mullins (C)	Diane Henkels (C)		
DAVISON VAN CLEVE PC	CLEANTECH LAW PARTNERS, PC		
brmullins@mwanalytics.com	dhenkels@cleantechlaw.com		
James Birkeland (C)	Wendy Gerlitz		
SMALL BUSINESS UTILITY ADVOCATES	NW ENERGY COALITION		
<u>James@utilityadvocates.org</u>	wendy@nwenergy.org		
Nona Soltero	Erin Apperson		
FRED MEYER STORES/KROGER	PACIFIC POWER		
Nona.soltero@fredmeyer.com	erin.apperson@pacificorp.com		
Kurt Boehm (C)	Oregon Dockets		
BOEHM KURTZ & LOWRY	PACIFICORP, DBA PACIFIC POWER		
kboehm@bkllawfirm.com	oregondockets@pacificorp.com		

# **OPUC DOCKET** No. UM 1417 SERVICE LIST

CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY, STE 400

PORTLAND OR 97205 dockets@oregoncub.org

PGE RATES & REGULATORY AFFAIRS

PORTLAND GENERAL ELECTRIC COMPANY

121 SW SALMON STREET, 1WTC0306

PORTLAND OR 97204 pge.opuc.filings@pgn.com

MARC CODY

PORTLAND GENERAL ELECTRIC

PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC 0306

PORTLAND OR 97204 marc.cody@pgn.com

ROBERT JENKS (C)

CITIZENS' UTILITY BOARD OF OREGON

610 SW BROADWAY, STE 400

PORTLAND OR 97205 bob@oregoncub.org

JUDY JOHNSON (C)

PUBLIC UTILITY COMMISSION OF

**OREGON** 

PO BOX 1088

SALEM OR 97308-1088 judy.johnson@state.or.us

JOHANNA RIEMENSCHNEIDER

PUC STAFF - DEPARTMENT OF JUSTICE

**BUSINESS ACTIVITIES SECTION** 

1162 COURT ST NE

SALEM OR 97301-4796

johanna.riemenschneider@doj.state.or.us

DOUGLAS C TINGEY

PORTLAND GENERAL ELECTRIC

121 SW SALMON 1WTC1301

PORTLAND OR 97204

doug.tingey@pgn.com