



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

December 20, 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

**ATTN: 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. 18-092.

A Notice of Application regarding the filing of this application will be sent electronically to those parties on the UE 335 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 503-464-7805.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Stefan Brown", is written over a light blue rectangular background. The signature is fluid and cursive.

Stefan Brown  
Manager, Regulatory Affairs

*SB:np*  
*encls.*

cc: Service Lists: UE 335 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” or “OPUC”) Order No. 17-108, 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 (“LRRRA”), implemented through Schedule 123 (“Decoupling adjustment”). PGE requests this reauthorization commence effective January 1, 2019 through December 31, 2019.

**I. Deferral History**

In Docket No. UE 262 (OPUC Order No. 13-459), the Commission approved the extension of PGE’s SNA and LRRRA mechanisms through 2016. Subsequently, in UE 306, the Commission approved extending these mechanisms for three years beginning January 2017 (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
12/22/15	1/01/16 – 12/31/16	16-039	1/26/16
12/12/16	1/01/17 – 12/31/17	17-108	3/21/17
12/15/17	1/01/18 – 12/31/2018	18-092	3/27/18

## II. OAR 860-027-0300 Requirements

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

### a. Description of Amounts

The 2018 deferral amounts are not yet available. They will be calculated in the first quarter of 2019. The decoupling mechanism provides for customer collection or refund if Schedule 7, Schedule 32, and Schedule 83 weather adjusted use per customer is less than or more than that approved in PGE’s most recent general rate case (UE 335).

### b. Reasons for Deferral

PGE seeks reauthorization to defer revenues associated with the SNA and LRRRA mechanisms (Schedule 123). Without the reauthorization, this deferral will expire on December 31, 2018. 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 LRRRA 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 LRRRA 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 LRRRA 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 335 pursuant to PGE's Schedule 123. The LRRRA difference is based on cumulative applicable 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 the amortization of deferred accounts.

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. 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 to defer revenues associated with the SNA and the LRRA mechanisms (Schedule 123) between January 1, 2019 and December 31, 2019 as described in II (b) above. Without reauthorization this deferral will expire on December 31, 2018.

**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](mailto:doug.tingey@pgn.com)

PGE-OPUC Filings  
Rates & Regulatory Affairs  
Portland General Electric  
1 WTC 0306  
121 SW Salmon Street  
Portland, OR 97204  
Phone: 503.464.7805  
E-mail: [pge.opuc.filings@pgn.com](mailto: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:

Rob Macfarlane, Regulatory Analyst  
E-mail: [rob.macfarlane@pgn.com](mailto:rob.macfarlane@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 LRRRA amortizations will be collected from or refunded to customers with no sharing mechanism.

d. Rate Spread/Rate Design

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

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

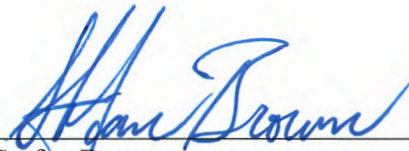
The three percent test measures the annual overall average impact on customer rates resulting from deferral amortizations. The three percent test limits (exceptions at ORS 757.259(7) and (8)) the aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's 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 LRRRA recovery mechanisms effective January 1, 2019 through December 31, 2019.

DATED: December 20, 2018.

Respectfully Submitted,



---

Stefan Brown  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503.464.7805  
Fax: 503.464.7651  
E-Mail: pge.opuc.filings@pgn.com

**UM 1417**

**Attachment A**

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

**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 20, 2018, 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” or “OPUC”).

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 20, 2019.

Dated: December 20, 2018.

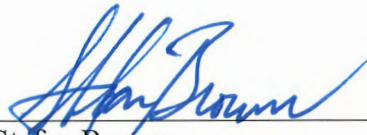
  
\_\_\_\_\_  
Stefan Brown  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503.464.7805  
Facsimile: 503.464.7651  
E-Mail: pge.opuc.filings@pgn.com



## 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. UE 335 and UM 1417.

DATED at Portland, Oregon, this 20<sup>th</sup> day of December, 2018.



---

Stefan Brown  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon St., 1WTC0306  
Portland, OR 97204  
Telephone: 503-464-7805  
Facsimile: 503-464-7651  
E-Mail: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

**SERVICE LIST**  
**OPUC Docket**  
**No. UE 335**

**ALBERTSONS**

BRIAN BETHKE  
11555 DUBLIN CANYON ROAD

250 PARKCENTER BLVD  
BOISE ID 83706  
brian.bethke@albertsons.com

CHRIS ISHIZU  
ALBERTSONS COMPANIES, INC.

250 PARKCENTER BLVD  
BOISE ID 83706  
chris.ishizu@albertsons.com

GEORGE WAIDELICH  
ALBERTSONS COMPANIES' INC.

11555 DUBLIN CANYON ROAD  
PLEASANTON OR 94588  
george.waidelich@albertsons.com

**AWEC UE 335**

BRADLEY MULLINS (C)  
MOUNTAIN WEST ANALYTICS

1750 SW HARBOR WAY STE 450  
PORTLAND OR 97201  
brmullins@mwanalytics.com

TYLER C PEPPE (C)  
DAVISON VAN CLEVE, PC

1750 SW HARBOR WAY STE 450  
PORTLAND OR 97201  
tcp@dvclaw.com

ROBERT SWEETIN (C)  
DAVISON VAN CLEVE, P.C.

185 E. RENO AVE, SUITE B8C  
LAS VEGAS NV 89119  
rds@dvclaw.com

**CALPINE SOLUTIONS**

GREGORY M. ADAMS (C)  
RICHARDSON ADAMS, PLLC

PO BOX 7218  
BOISE ID 83702  
greg@richardsonadams.com

GREG BASS  
CALPINE ENERGY SOLUTIONS, LLC

401 WEST A ST, STE 500  
SAN DIEGO CA 92101  
greg.bass@calpinesolutions.com

KEVIN HIGGINS (C)  
ENERGY STRATEGIES LLC

215 STATE ST - STE 200  
SALT LAKE CITY UT 84111-2322  
khiggins@energystrat.com

**FRED MEYER**

KURT J BOEHM (C)  
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510  
CINCINNATI OH 45202  
kboehm@bklawfirm.com

JODY KYLER COHN (C)  
BOEHM, KURTZ & LOWRY

36 E SEVENTH ST STE 1510  
CINCINNATI OH 45202  
jkylercohn@bklawfirm.com

**NIPPC**

ROBERT D KAHN  
NORTHWEST & INTERMOUNTAIN POWER  
PRODUCERS COALITION

PO BOX 504  
MERCER ISLAND WA 98040  
rkahn@nippc.org

IRION A SANGER (C)  
SANGER LAW PC

1117 SE 53RD AVE  
PORTLAND OR 97215  
irion@sanger-law.com

MARK R THOMPSON (C)  
SANGER LAW PC

1117 SE 53RD AVE  
PORTLAND OR 97215  
mark@sanger-law.com

#### **OREGON CITIZENS UTILITY BOARD**

OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
dockets@oregoncub.org

MICHAEL GOETZ (C)  
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY STE 400  
PORTLAND OR 97205  
mike@oregoncub.org

ROBERT JENKS (C)  
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
bob@oregoncub.org

#### **PACIFICORP**

PACIFICORP, DBA PACIFIC POWER

825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
oregondockets@pacificorp.com

MATTHEW MCVEE  
PACIFICORP

825 NE MULTNOMAH  
PORTLAND OR 97232  
matthew.mcvee@pacificorp.com

#### **PORTLAND GENERAL ELECTRIC**

PGE RATES & REGULATORY AFFAIRS

PORTLAND GENERAL ELECTRIC COMPANY  
121 SW SALMON STREET, 1WTC0306  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

STEFAN BROWN (C)  
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST, 1WTC0306  
PORTLAND OR 97204  
stefan.brown@pgn.com; pge.opuc.filings@pgn.com

DOUGLAS C TINGEY (C)  
PORTLAND GENERAL ELECTRIC

121 SW SALMON 1WTC1301  
PORTLAND OR 97204  
doug.tingey@pgn.com

#### **SBUA**

JAMES BIRKELUND  
SMALL BUSINESS UTILITY ADVOCATES

548 MARKET ST STE 11200  
SAN FRANCISCO CA 94104  
james@utilityadvocates.org

DIANE HENKELS (C)  
CLEANTECH LAW PARTNERS PC

420 SW WASHINGTON ST STE 400  
PORTLAND OR 97204  
dhenkels@cleantechlaw.com

#### **STAFF**

STEPHANIE S ANDRUS (C)  
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
stephanie.andrus@state.or.us

MARIANNE GARDNER (C)  
PUBLIC UTILITY COMMISSION OF  
OREGON

PO BOX 1088  
SALEM OR 97308-1088  
marianne.gardner@state.or.us

SOMMER MOSER (C)  
PUC STAFF - DEPARTMENT OF JUSTICE

1162 COURT ST NE  
SALEM OR 97301  
sommer.moser@doj.state.or.us

**WALMART**

VICKI M BALDWIN (C)  
PARSONS BEHLE & LATIMER

201 S MAIN ST STE 1800  
SALT LAKE CITY UT 84111  
vbaldwin@parsonsbehle.com

STEVE W CHRISS (C)  
WAL-MART STORES, INC.

2001 SE 10TH ST  
BENTONVILLE AR 72716-0550  
stephen.chriss@wal-mart.com

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

OREGON CITIZENS' UTILITY BOARD

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

STEFAN BROWN  
PORTLAND GENERAL ELECTRIC

PORTLAND GENERAL ELECTRIC COMPANY  
121 SW SALMON STREET, 1WTC 0306  
PORTLAND OR 97204  
stefan.brown@pgn.com

ROBERT JENKS (C)  
CITIZENS' UTILITY BOARD OF OREGON

610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
bob@oregoncub.org

LANCE KAUFMAN (C)  
PUBLIC UTILITY COMMISSION OF OREGON

PO BOX 1088  
SALEM OR 97308-1088  
lance.kaufman@state.or.us

MITCH MOORE (C)  
PUBLIC UTILITY COMMISSION OF OREGON

PO BOX 1088  
SALEM OR 97308-1088  
mitch.moore@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