

December 30, 2019

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: 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 Commission Order No. 19-066.

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.

Sincerely,

Jaki Ferchland

Manager, Revenue Requirement

JF:np Enclosures

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. 19-066, 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, 2020 through December 31, 2020.

I. Deferral History

Commission Order No. 16-359 approved the extension of PGE's SNA and LRRA mechanisms through 2019 (Docket No. UE 306). Subsequently, in Order No. 18-464, the Commission approved PGE's request to add Schedule 83 customers under the SNA mechanism, and approved extending these mechanisms for another three years beginning January 2020 (Docket No. UE 335).

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
12/20/18	1/01/19 – 12/31/2019	19-066	2/28/19

II. OAR 860-027-0300 Requirements

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

a. Description of Amounts

The 2019 deferral amounts are not yet available. They will be calculated in the first quarter of 2020. 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 (Docket No. UE 335).

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, 2019. 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 use three separate accounts for the applicable schedules included in the SNA mechanism and a separate account for the LRRA mechanism. 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 335 pursuant to PGE's Schedule 123. The LRRA 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 modified blended treasury 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, 2020 and December 31, 2020 as described in II (b)

above. Without reauthorization this deferral will expire on December 31, 2019.

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: 503.464.7805

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:

Jaki Ferchland, Manager Revenue Requirement

E-mail: jacquelyn.ferchland@pgn.com

V. **Summary of Filing Conditions**

> Earnings Review a.

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

Prudence Review

A prudence review should include a verification of the accounting methodology used to

determine the final amortization balance.

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))

For PGE's decoupling mechanism the commission has approved separate rate impact conditions pursuant to Schedule 123, thus the three-percent test is not applicable.

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, 2020 through December 31, 2020.

DATED: December 30, 2019.

Respectfully Submitted,

Jaki Ferchland

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503.464.7805

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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 30, 2019, 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 30, 2020.

Dated: December 30, 2019

Jaki Ferchland

Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street, 1WTC0306

Portland, OR 97204 Telephone: 503.464.7805

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 30st day of December, 2019.

Jaki Ferchland

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Certificate of Service [UE 335 and UM 1417]

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