

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

December 15, 2017

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

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. 17-108.

A Notice of Application regarding the filing of this application will be sent electronically to those parties on the UM 1417 and the UE 319 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.

Stefan Brown Manager, Regulatory Affairs

encls. cc: Mitch Moore, OPUC Bob Jenks, CUB Tyler Pepple, ICNU

Service Lists: UM 1417 and UE 319

## **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. 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 ("LRRA"), implemented through Schedule 123 ("Decoupling adjustment"). PGE requests this reauthorization commence effective January 1 through December 31, 2018.

## I. <u>Deferral History</u>

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, in UE 306, 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.

| 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      |

Table 1

| 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  |
|          |                    |        |          |

### II. OAR 860-027-0300 Requirements

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

a. Description of Amounts

The 2017 deferral amounts are not yet available. They will be calculated in the first quarter of 2018. 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 319).

## 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, 2017. 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

PGE Application for Reauthorization of Deferred Accounting [UM 1417]

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 319 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 interest rate set by the Commission for the amortization of deferred accounts.

### e. <u>Notice</u>

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.** <u>The following is provided pursuant to OAR 860-027-0300(4):</u>

## 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 and December 31, 2018 as described in II (b) above. Without reauthorization this deferral will expire on December 31, 2017.

PGE Application for Reauthorization of Deferred Accounting [UM 1417]

## IV. <u>PGE Contacts</u>

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:

Stefan Brown, Manager, Regulatory Affairs E-mail: <u>stefan.brown@pgn.com</u>

## V. <u>Summary of Filing Conditions</u>

a. Earnings Review

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

## b. <u>Prudence Review</u>

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. <u>Sharing</u>

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, 2018.

DATED: December 15, 2017.

Respectfully Submitted,

Stefan BrownManager, Regulatory AffairsPortland General Electric Company121 SW Salmon Street, 1WTC0306Portland, OR97204Telephone:503.464.7805Fax:503.464.7651E-Mail:pge.opuc.filings@pgn.com

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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 15, 2017, 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 15, 2018.

Dated: December 15, 2017.

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

Notice of Application [UM 1417 and UE 319]

## **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 319.

DATED at Portland, Oregon, this 15<sup>th</sup> day of December, 2017.

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

Certificate of Service [UM 1417 and UE 319]

# SERVICE LIST OPUC Docket No. UE 319

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KEVIN HIGGINS (C) ENERGY STRATEGIES LLC

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OREGON CITIZENS' UTILITY BOARD

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Certificate of Service [UM 1417 and UE 319]

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