

January 20, 2011

Via E-Mail and US Mail

OPUC Filing Center Oregon Public Utility Commission 550 Capitol Street NE, Ste. 215 Salem, OR 97301

**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 are an original and five copies of 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 Orders 09-162, 10-077, and 11-110.

A Notice of Application regarding the filing of this application has been sent to those parties who have not waived paper service on the UE 215 and to those who have been approved to receive hard copy service for OPUC Docket No. UM 1417.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at 503.464.7580 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.

Sincelety

Patrick G. Hager

Manager, Regulatory Affairs

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cc: Carla Bird, OPUC Bob Jenks, CUB

Melinda Davison, ICNU

UM 1417 and UE 215 Service Lists

#### 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 OPUC Order Nos. 08-169, 09-020, 09-162, 10-077, and 11-110, 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 February 1, 2012, through December 31, 2012. This 11-month reauthorization will allow for the next reauthorization request to be on a calendar year basis and therefore consistent with the provisions of Schedule 123.

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

In Docket No. UE 215 (OPUC Order 10-478), the Commission approved the extension of PGE's SNA and LRRA mechanisms through December 31, 2013.

PGE filed and received reauthorization 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      |

## II. OAR 860-027-0300 Requirements

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

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

See Deferral History above. The decoupling mechanism provides for customer collection or refund if weather adjusted use per customer is less than or more than that approved in PGE's most recent general rate case (UE-215).

On January 20, 2011, PGE filed a request to reauthorize the deferral of revenues associated with the SNA, LRRA and ROE. PGE received approval through OPUC Order 11-110 for the period February 1, 2011 to and including January 31, 2012.

PGE has recorded an estimated refund of \$200,000 as of November 30, 2012, as weather adjusted use per customer was lower for Schedule 7, Residential, and higher for Schedule 32 Small Non-residential, than that approved in PGE's 2011 General Rate Case. This amount will be collected/refunded over a one-year period beginning June 1, 2012.

## 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 January 31, 2012. 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 or 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 and 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 215 pursuant to PGE's Schedule 123. The LRRA difference is based on 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 February 1, 2012 and December 31, 2012 as described in II(b) above. Without reauthorization this deferral will expire on January 31, 2012.

## IV. PGE Contacts

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

Randy Dahlgren

Rates & Regulatory Affairs
Portland General Electric,

1 WTC0702

121 SW Salmon Street Portland, Oregon 97204

Phone: 503.464.7857

E-mail: pge.opuc.filings@pgn.com

Douglas C. Tingey

Assistant General Counsel Portland General Electric,

1 WTC1301

121 SW Salmon Street Portland, Oregon 97204

Phone: 503.464.8926

E-mail: Doug.Tingey@pgn.com

In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Launa Harmon, E-mail: Launa.Harmon@pgn.com

## V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer for later rate-making treatment revenues associated with the SNA and LRRA recovery mechanisms effective February 1, 2012 until December 31, 2012.

DATED this 20th<sup>th</sup> day of January, 2012.

Respectfully Submitted,

Patrick G. Hager

Manager, Regulatory Affairs

Portland General Electric Company 121 SW Salmon Street, 1WTC0702

Portland, OR 97204

Telephone:

503.464.7580 503.464.7651

Fax: E-Mail:

patrick.hager@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 (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 January 20, 2012, 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 Oregon Public Utility Commission (the "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 February 20, 2012.

Dated this 20<sup>th</sup> day of January 2012.

Patrick G. Hager

Manager Pagulatory

Manager, Regulatory Affairs
Portland General Electric Company

121 SW Salmon Street, 1WTC0702

Portland, OR 97204

Telephone:

503.464.7580

Fax:

503.464.7651

E-Mail:

patrick.hager@pgn.com

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an Application for Reauthorization of Deferral of Revenues Associated with the Sales Normalization Adjustment and Lost Revenue Recovery to be served by electronic mail on those parties whose email addresses appear on the attached service list and by U.S. Mail, First Class, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Dockets UM 1417/UE 215. These dockets are subject to waive paper rules in effect prior to OPUC Order 10-400, effective 10-14-10.

Dated at Portland, Oregon, this 20th day of January, 2012.

Patrick G. Hager

Manager, Regulatory Affairs

Portland General Electric Company 121 SW Salmon Street, 1WTC0702

Portland, OR 97204

Telephone: 503.464.7580

Fax: 503.464.7651

E-Mail: patrick.hager@pgn.com

# SERVICE LIST – OPUC DOCKET # UM 1417/UE 215

| Heather Rode                              | Viset I Doohm Attornov                       |
|---|--|
| · ·                                       | Kurt J. Boehm, Attorney BOEHM KURTZ & LOWRY  |
| heatherrode@gmail.com                     | kboehm@bklawfirm.com                         |
| (*Waived Paper Service)                   | (*Waived Paper Service)                      |
| Robert Jenks                              | Gordon Feighner                              |
| CITIZEN'S UTILITY BOARD OF OREGON         | CITIZENS' UTILITY BOARD OF OREGON            |
|   | gordon@oregoncub.org                         |
| bob@oregoncub.org (*Waived Paper Service) | (*Waived Paper Service)                      |
| Kevin Elliott Parks                       | G. Catriona McCracken                        |
| CITIZENS' UTILITY BOARD OF OREGON         | CITIZEN'S UTILITY BOARD OF OREGON            |
| kevin@oregoncub.org                       | catriona@oregoncub.org                       |
| (*Waived Paper Service)                   | (*Waived Paper Service)                      |
| Raymond Myers                             | Benjamin Walters, Deputy City Attorney       |
| CITIZEN'S UTILITY BOARD OF OREGON         | CITY OF PORTLAND                             |
|   | bwalters@ci.portland.or.us                   |
| ray@oregoncub.org                         | (*Waived Paper Service)                      |
| (*Waived Paper Service)  David Tooze      | Jess Kincaid, Energy Partnership Coordinator |
| CITY OF PORTLAND - PLANNING &             | COMMUNITY ACTION PARTNERSHIP OF              |
| SUSTAINABILITY                            | OREGON                                       |
| dtooze@ci.portland.or.us                  | jess@caporegon.org                           |
| (*Waived Paper Service)                   | (*Waived Paper Service)                      |
| S. Bradley Van Cleve                      | Stephanie S. Andrus, Assistant AG            |
| DAVISON VAN CLEVE                         | DEPARTMENT OF JUSTICE                        |
| 333 SW Taylor, Suite 400                  | 1162 Court Street, NE                        |
| Portland, OR 97204                        | Salem, OR 97301-4096                         |
| mail@dvclaw.com                           | stephanie.andrus@state.or.us                 |
| Kevin Higgins, Principal                  | Nona Soltero, Corporate Law Department #23C  |
| ENERGY STRATEGIES, LLC                    | FRED MEYER STORES/KROGER                     |
| khiggins@energystrat.com                  | nona.soltero@fredmeyer.com                   |
| (*Waived Paper Service)                   | (*Waived Paper Service)                      |
| Marcy Putnam, Political Affairs &         | Greg Bass                                    |
| Communication Representatives             | SEMPRA ENERGY SOLUTIONS, LLC                 |
| IBEW LOCAL 125                            | gbass@semprasolutions.com                    |
| 17200 NE Sacramento Street                | (*Waived Paper Service)                      |
| Portland, OR 97230                        |  |
| marcy@ibew125.com                         |  |
| Lon L. Peters                             | Jordan A. White, Senior Counsel              |
| NW ECONOMIC RESEARCH, INC.                | PACIFIC POWER & LIGHT                        |
| lon@nw-econ.com                           | jordan.white@pacificorp.com                  |
| (*Waived Paper Service)                   | (*Waived Paper Service)                      |
| Oregon Dockets                            | Judy Johnson                                 |
| PACIFICORP, dba PACIFIC POWER &           | Oregon Public Utility Commission             |
| LIGHT                                     | PO Box 2148                                  |
| oregondockets@pacificorp.com              | Salem, OR 97308-2148                         |
| (*Waived Paper Service)                   | judy.johnson@state.or.us                     |

| Carla Bird                       | Randall J. Falkenberg         |
|----------------------------------|-------------------------------|
| Oregon Public Utility Commission | RFI CONSULTING, INC.          |
| PO Box 214                       | PMB 362                       |
| Salem, OR 97308-2148             | 8343 Roswell Road             |
| carla.bird@state.or.us           | Sandy Springs, GA 30350       |
|                                  | consultrfi@aol.com            |
| Gregory M. Adams                 | Peter J. Richardson           |
| RICHARDSON & O'LEARY, PLLC       | RICHARDSON & O'LEARY, PLLC    |
| greg@richardsonandoleary.com     | peter@richardsonandoleary.com |
| (*Waived Paper Service)          | (*Waived Paper Service)       |
| James Benya                      | . Leo Smith                   |
| THE INTERNATIONAL DARK SKY       | THE INTERNATIONAL DARK SKY    |
| ASSOCIATION                      | ASSOCIATION                   |
| jbenya@benyalighting.com         | leo@smith.net                 |
| (*Waived Paper Service)          | (*Waived Paper Service)       |

# SERVICE LIST – OPUC DOCKET # UM 1417

| Gordon Feighner                   | Robert Jenks                      |
|-----------------------------------|-----------------------------------|
| CITIZENS' UTILITY BOARD OF OREGON | CITIZENS' UTILITY BOARD OF OREGON |
| gordon@oregoncub.org              | bob@oregoncub.org                 |
| (*Waived Paper Service)           | (*Waived Paper Service)           |
| G. Catriona McCracken             | Raymond Myers                     |
| CITIZENS' UTILITY BOARD OF OREGON | CITIZENS' UTILITY BOARD OF OREGON |
| catriona@oregoncub.org            | ray@oregoncub.org                 |
| (*Waived Paper Service)           | (*Waived Paper Service)           |
| Carla Bird                        |                                   |
| OREGON PUBLIC UTILITY COMMISSION  |                                   |
| 550 Capitol Street NE, #215       |                                   |
| Salem, OR 97308-2148              |                                   |
| carla.bird@state.or.us            |                                   |

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