

December 29, 2021

Via Electronic Filing

Public Utility Commission of Oregon Attention: Filing Center PO Box 1088 Salem, OR 97308-1088

RE: UM 1417 PGE's Application for Deferral of Revenues Associated with the Sales Normalization adjustment, the Lost Revenue Recovery Adjustment and the refund of Return on Equity

Filing Center;

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 prior authorization pursuant to Commission Order No. 21-035.

A Notice of Application regarding the filing of this application will be sent electronically to those parties on the UE 394 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 503-464-7488. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

/s/Jaki Ferchland

Jaki Ferchland Manager, Revenue Requirement

JF/np Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1417

In the Matter of
PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Revenues Associated with the Sales Normalization Adjustment and the Lost Revenue Recovery Adjustment PORTLAND GENERAL ELECTRIC COMPANY APPLICATION FOR REAUTHORIZATTION OF DEFERRED ACCOUNTING

Pursuant to ORS 757.259, OAR 860-027-0300, and Public Utility Commission of Oregon ("Commission" or "OPUC") Order No. 21-035, 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 be effective January 1, 2022 through December 31, 2022.

I. <u>Deferral History</u>

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.
1/30/09	2/01/09 - 1/31/10	09-162
1/20/10	2/01/10 - 1/31/11	10-077
1/20/11	2/01/11 - 1/31/12	11-110
1/20/12	2/01/12 - 12/31/12	12-075
12/31/13	1/01/13 - 12/31/13	13-044
12/19/14	1/01/14 - 12/31/14	14-020
12/30/14	1/01/15 - 12/31/15	15-019
12/22/15	1/01/16 - 12/31/16	16-039
12/12/16	1/01/17 - 12/31/17	17-108
12/15/17	1/01/18 - 12/31/18	18-092
12/20/18	1/01/19 – 12/31/19	19-066
12/30/19	1/01/20 - 12/31/20	20-031
12/29/20	1/01/21 - 12/31/21	21-035

II. OAR 860-027-0300 Requirements

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

A. Description 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.

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, 2021. 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. <u>Proposed Accounting</u>

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 2021 deferral amounts are not yet available but will be calculated in the first quarter of 2022.

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 this 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, 2022 and December 31, 2022 as described in II (b) above. Without reauthorization this deferral will expire on December 31, 2021.

IV. PGE Contacts

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

Loretta Mabinton
Managing Assistant General Counsel
Portland General Electric Company
1WTC1301
121 SW Salmon Street
Portland OR 97204
(503) 464-7822
loretta.mabinton@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
1WTC0306
121 SW Salmon Street
Portland OR 97204
(503) 464-7805
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 Email Manager, Revenue Requirement jacquelyn.ferchland@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 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))

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, 2022 through December 31, 2022.

DATED this 29th day of December 2021.

/s/Jaki Ferchland

Jaki Ferchland Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street Portland OR 97204 (503) 464-7488 jacquelyn.ferchland@pgn.com

Attachment A

Notice of Application for Reauthorization to Defer 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
PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Revenues Associated with the Sales Normalization Adjustment and the Lost Revenue Recovery Adjustment PORTLAND GENERAL ELECTRIC COMPANY NOTICE OF APPLICATION FOR REAUTHORIZATION OF DEFERRED ACCOUNTING

On December 29, 2021, 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 29, 2022.

DATED this 29th day of December 2021.

/s/Jaki Ferchland

Jaki Ferchland Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street Portland OR 97204 (503) 464-7488 jacquelyn.ferchland@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 394 and UM 1417.

DATED at Portland, Oregon, this 29th day of December, 2021.

Jaki Ferchland
Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
(503) 464-7488
jacquelyn.ferchland@pgn.com

Service List OPUC Docket UE 394

WILLIAM STEELE BILL STEELE AND ASSOCIATES, LLC	PO BOX 631151 HIGHLANDS RANCH CO 80164 w.steele1@icloud.com			
AWEC				
JESSE O GORSUCH (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 jog@dvclaw.com			
CORRINE MILINOVICH (C) (HC) DAVISON VAN CLEVE, P.C.	1750 SW HARBOR WAY, STE. 450 PORTLAND OR 97201 com@dvclaw.com			
TYLER C PEPPLE (C) (HC) DAVISON VAN CLEVE, PC	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com			
CALPINE SOLUTIONS				
GREGORY M. ADAMS (C) (HC) 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) (HC) ENERGY STRATEGIES LLC	215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com			
FRED MEYER				
JUSTIN BIEBER (C) FRED MEYER/ENERGY STRATEGIES LLC	215 SOUTH STATE STREET, STE 200 SALT LAKE CITY UT 84111 jbieber@energystrat.com			
KURT J BOEHM (C) BOEHM KURTZ & LOWRY	36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com			
JODY KYLER COHN (C) BOEHM, KURTZ & LOWRY	36 E SEVENTH ST STE 1510 CINCINNATI OH 45202 jkylercohn@bkllawfirm.com			
OREGON CITIZENS UTILITY BOARD				
OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org			
WILLIAM GEHRKE (C) OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY STE 400 PORTLAND OR 97206 will@oregoncub.org			
MICHAEL GOETZ (C) OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY STE 400 PORTLAND OR 97205 mike@oregoncub.org			

PGE

Service List OPUC Docket UE 394

PORTLAND GENERAL ELECTRIC

MADELILNE MALMQUIST (C) WALMART

	TORTEAND GENERAL ELECTRIC	
		pge.opuc.filings@pgn.com
	LORETTA I MABINTON (C) (HC) PORTLAND GENERAL ELECTRIC	121 SW SALMON ST - 1WTC1711 PORTLAND OR 97204 loretta.mabinton@pgn.com
	JAY TINKER (C) PORTLAND GENERAL ELECTRIC	121 SW SALMON ST 1WTC-0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com
SBUA		
	JAMES BIRKELUND SMALL BUSINESS UTILITY ADVOCATES	548 MARKET ST STE 11200 SAN FRANCISCO CA 94104 james@utilityadvocates.org
	DIANE HENKELS (C) SMALL BUSINESS UTILITY ADVOCATES	621 SW MORRISON ST. STE 1025 PORTLAND OR 97205 diane@utilityadvocates.org
STAFF		
	STEPHANIE S ANDRUS (C) PUC STAFFDEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
	JILL D GOATCHER (C) PUC STAFFDEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 jill.d.goatcher@doj.state.or.us
	MATTHEW MULDOON (C) PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 matt.muldoon@puc.oregon.gov
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

madelinemalmquist@parsonsbehle.com

Service List OPUC Docket 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
STEPHANIE S ANDRUS (C) PUC STAFFDEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
JAKI FERCHLAND PORTLAND GENERAL ELECTRIC	121 SW SALMON ST. 1WTC0306 PORTLAND OR 97204 jacquelyn.ferchland@pgn.com
ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
LORETTA I MABINTON PORTLAND GENERAL ELECTRIC	121 SW SALMON ST - 1WTC1711 PORTLAND OR 97204 loretta.mabinton@pgn.com
MITCH MOORE (C) PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 mitch.moore@puc.oregon.gov