



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

December 30, 2014

**Via E-Mail / US Mail**  
puc.filingcenter@state.or.us

Public Utility Commission Oregon  
PO Box 1088  
Salem, OR 97308-1088

Attn: OPUC 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 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 Order No. 14-020.

A Notice of Application regarding the filing of this application will be sent electronically to those parties on the UE-283 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 503-464-7580 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.

Sincerely,

A handwritten signature in blue ink that reads "Alex Tooman for". The signature is written in a cursive, flowing style.

Patrick G. Hager  
Manager, Regulatory Affairs

*encls.*

cc: Deborah Garcia, OPUC  
Bob Jenks, CUB  
Melinda Davison, ICNU  
Service List: UE 283 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 OPUC Order Nos. 13-044 and 14-020. 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, 2015, through December 31, 2015.

**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 December 31, 2016.

PGE filed and received reauthorization for this deferral as shown in Table 1 below.

**Table 1**

<b>Filing Date</b>	<b>Renewal Period</b>	<b>Order No.</b>	<b>Approval Date</b>
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
12/31/12	1/01/13 - 12/31/13	13-044	02/12/13
12/19/13	1/01/14 – 12/31/14	14-020	01/22/14

## II. OAR 860-027-0300 Requirements

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

### a. Description of Amounts

See Deferral History above. 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-283).

On December 19, 2014, PGE filed a request to reauthorize the deferral of revenues associated with the SNA and LRRRA. PGE received approval through OPUC Order No. 14-020 for the deferral period beginning January 1, 2014 through December 31, 2014.

### 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, 2014. 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 283 pursuant to PGE's Schedule 123. The LRRRA difference is based on cumulative 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. 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 LRRRA mechanisms (Schedule 123) between January 1, 2015, and December 31, 2015 as described in II (b) above. Without reauthorization this deferral will expire on December 31, 2014.

#### 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 0702  
121 SW Salmon Street  
Portland, OR 97204  
Phone: 503.464.7857  
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: Marc Cody, E-mail: [marc.cody@pgn.com](mailto:marc.cody@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))

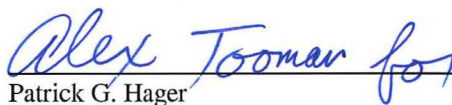
The three percent test measures the annual overall average on customer rates resulting from deferral amortizations. The three percent test limits (exceptions at ORS 757.259(7) and (8)) the aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross 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. Should a deferred balance result in a credit to customers, the balance is exempt from the three percent test.

**VI. Conclusion**

For the reasons stated above, PGE requests permission to continue to defer for later rate-making treatment revenues associated with the SNA and LRRRA recovery mechanisms effective January 1, 2015 until December 31, 2015.

DATED: December 30, 2014.

Respectfully Submitted,



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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, 2014, 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 January 29, 2015.

Dated: December 30, 2014.

  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused **UM 1417 APPLICATION FOR REAUTHORIZATION TO DEFERRAL OF REVENUES ASSOICATED 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 283 and UM 1417.

DATED at Portland, Oregon, this 30<sup>th</sup> day of December 2014.



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**SERVICE LISTS**  
**OPUC DOCKET NO. UE 283/UM 1417**

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