

December 19, 2013

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 Nos. 09-162, 10-077, 11-110, 12-075, and 13-044.

A Notice of Application regarding the filing of this application will be sent electronically to those parties on the UE-262 service list.

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,

Patrick G. Hager

Manager, Regulatory Affairs

encls.

cc: Deborah Garcia, OPUC Bob Jenks, CUB Melinda Davison, ICNU UE 262 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, 11-110, 12-075, and 13-044. 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, 2014, through December 31, 2014.

### I. Deferral History

In Docket No. UE 215 (OPUC Order No. 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

Renewal Period	Order No.	Approval Date
2/01/09 - 1/31/10	09-162	05/06/09
2/01/10 - 1/31/11	10-077	03/02/10
2/01/11 – 1/31/12	11-110	04/07/11
2/01/12 - 12/31/12	12-075	03/07/12
1/01/13 - 12/31/13	13-044	02/12/13
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### 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-262).

On December 31, 2012, PGE filed a request to reauthorize the deferral of revenues associated with the SNA and LRRA. PGE received approval through OPUC Order No. 13-044 for the deferral period beginning January 1, 2013 through December 31, 2013.

#### 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 1, 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 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 262 pursuant to PGE's Schedule 123. The LRRA 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 LRRA mechanisms (Schedule 123) between January 1, 2014, and December 31, 2014 as described in II (b) above. Without reauthorization this deferral will expire on December 31, 2013.

## 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 0702 121 SW Salmon Street Portland, OR 97204 Phone: 503.464.7857

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

## V. Summary of Filing Conditions<sup>1</sup>

#### 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

Any sharing would stem from the results of earnings review.

<sup>&</sup>lt;sup>1</sup> Per Agreement with OPUC Staff on January 24, 2012.

#### d. Rate Spread/Rate Design

The SNA and LRRA amortizations will be spread as specified in Schedule 123.

#### 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 ratemaking treatment revenues associated with the SNA and LRRA recovery mechanisms effective January 1, 2014 until December 31, 2014.

DATED: December 19, 2013.

Respectfully Submitted,

Tooman for

Manager, Regulatory Affairs

Portland General Electric Company 121 SW Salmon Street, 1WTC0702

Portland, OR 97204

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um-1417 pge def app reauth notice and cos 12.19.13.docx

# **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 19, 2013, 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 18, 2014.

Dated: December 19, 2013.

Patrick G. Hager

Manager, Regulatory Affairs

Portland General Electric Company

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Portland, OR 97204

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#### 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 Docket UE 262. UM 1417 is subject to waive paper rules in effect prior to OPUC Order No. 10-400, effective October 14, 2010.

Dated: December 19, 2013.

Patrick G. Hager

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