



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

May 5, 2017

Email

puc.filingcenter@state.or.us

Public Utility Commission of Oregon
201 High Street, Suite 100
P. O. Box 1088
Salem, OR 97308-1088

Attn: Commission Filing Center

**Re: UM 1482 Application for Reauthorization to Defer Expenses
Associated with a Photovoltaic Volumetric Incentive Rate Pilot**

Pursuant to ORS 757.259, ORS 757.365, ORS 469A.120, ORS 757.201, OAR 860-027-0300, enclosed for filing is the Application of Portland General Electric Company for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot. Per OAR 860-027-0300(2), the authorized deferred account expired 12 months from the date the deferral was reauthorized or May 6, 2015, and PGE's 2016 filing is awaiting an Order.

Portland General Electric Company ("PGE") hereby requests authorization to continue an AAC deferral for the period May 7, 2017 through May 6, 2018

A Notice of Application regarding the filing of this application is attached. We have provided notification to the UM 1482 and UE 319 service lists. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

If you have any questions or require further information, please call me at (503) 464-8937 or Karla Wenzel at (503) 464-8718.

Sincerely,

*Marc Cody
for Stefan Brown*

Stefan Brown
Manager, Regulatory Affairs

SB/
encls.

cc: UM 1482 and UE 319 Service Lists

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1482

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot

Application for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, aka the PGE Solar Payment Option Pilot

Pursuant to ORS 757.365, ORS 469A.120, ORS 757.210, Schedule 137 is an automatic adjustment clause (“AAC”) for costs related to Portland General Electric Company’s (“PGE”) Photovoltaic Volumetric Incentive Rate Pilot (“PV VIR” or “Pilot”). Oregon Revised Statute 757.365(10) allows for the recovery of all prudently incurred PV VIR costs in rates. As necessary to enable cost recovery under the AAC, Portland General Electric Company (“PGE”) hereby requests authorization to continue an AAC deferral pursuant to the following Public Utility Commission of Oregon (the “Commission”) statutes, rules and cases: ORS 757.259, ORS 757.365, ORS 469A.120, ORS 757.210, OAR 860-027-0300, OAR 860-084-0380, 860-084-0390, and Orders No. 14-271 and 15-185. PGE requests this reauthorization May 7, 2017 through May 6, 2018.

I. Deferral History:

Under Docket AR 538, the Commission promulgated its Division 84 rules for the PV VIR Pilot. Docket UM 1452 set forth additional implementation requirements through OPUC Orders detailed below, the most recent being Order Nos. 14-271 and 15-185. The Pilot, required by state law, provides payments to retail electric customers for electricity generated by permanently installed solar photovoltaic energy systems through Schedules 215, 216 and 217. This deferral allows PGE to recover costs associated with the Pilot, through an AAC under Schedule 137, Customer Owned Solar Payment Option Cost Recovery Mechanism.

PGE has filed and received reauthorization for this deferral, as shown in Table 1 below:

Table 1

Filing Date	Renewal Period	Order No.	Approval Date
5/06/2010	5/6/2010 – 5/5/2011	11-059	2/16/2011
4/28/2011	5/7/2011 – 5/6/2012	11-281	8/01/2011
5/04/2012	5/7/2012 – 5/6/2013	12-202	5/07/2012
5/02/2013	5/7/2013 – 5/6/2014	13-250	7/02/2013
4/28/2014	Supplemented	N/A	
7/08/2014	5/7/2014 – 5/6/2015	14-271	7/22/2014
5/05/2015	5/7/2015 – 5/6/2016	15-185	06/09/2015
6/06/2016	5/7/2016 – 5/6/2017		Pending
5/04/2017	5/7/2017 – 5/6/2018		Pending

II. OAR 860-027-0300 Requirement (3):

a. Description of Utility Expense for which deferred accounting is requested.

The utility expenses include incremental costs consisting of volumetric incentive payments and/or retail bill offsets to participants, administrative costs associated with the PV VIR program operations, data collection, development costs for billing and website, customer surveys, and regulatory reporting requirements. Credits to the balancing account include: deposit forfeitures, interconnection application fees, customer charges, assignment fees, and the avoided energy value. Amounts in the balancing account accrue interest at the Commission-authorized rate of return for deferred accounts.

b. Reasons for Deferral

PGE seeks reauthorization to defer incremental costs associated with this deferral for the reasons stated in the first paragraph of this Application.

c. Proposed accounting for recording amounts deferred

PGE proposes no changes in accounting for the deferred amount.

d. Estimate of Amounts to be recorded for the next 12 months.

See II (a) above. The amounts to be deferred consist of incremental costs of the Pilot for (1) VIR payments to participants including any retail electricity service bill offset amounts, and (2) program costs incurred to implement and administer the requirements for the Pilot. For both cost categories, the

amounts deferred depend upon actual participation levels and PV system sizes of participants in the Pilot. PGE estimates incremental costs may range from \$6.5 to \$7 million for the deferral period, May 7, 2017 through May 6, 2018, consisting largely of VIR payments to participants. As more systems are installed from existing enrollments, the payment amounts in 2017 and 2018 to customers are expected to increase.

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 (OAR 860-027-0300[6]).

III. OAR 860-027-0300 Requirement (4), Reauthorization:

a. Description of deferred accounting entries

See II a. and II c. above. The deferral balance through December 2016 is approximately \$91,000.

b. The reason for continuing the deferred account

PGE seeks approval to continue to defer incremental costs associated with the Pilot not currently in rates. The granting of this reauthorization request will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. This deferral should be continued and is warranted because ORS 757.365 requires PGE to offer the Pilot and thus incur the costs to implement and operate the Pilot. PGE requests an effective date of May 7, 2017 through May 6, 2018, as the deferral reauthorization period.

IV. PGE contacts:

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

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric,
1 WTC0306
121 SW Salmon Street
Portland, Oregon 97204
Phone: 503.464.8929
E-mail: pge.opuc.filings@pgn.com

Douglas C. Tingey
Associate 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:

Stefan Brown
Rates and Regulatory Affairs
Email: stefan.brown@pgn.com

V. Summary of Filing Conditions¹:

Information related to future amortization is listed below:

- a. Earnings Review: Schedule 137 recovers costs associated with the Solar Payment Option Pilot not otherwise included in rates. The schedule is an AAC as provided for under ORS 469A, and defined in the Renewable Portfolio Standards, ORS 757.210, and an earnings review is not applicable to this deferral. See PGE Schedules 215, 216 and 217.
- b. Prudence: Not specifically required, but Staff may review deferred costs as appropriate.
- c. Sharing (Percent): All prudently incurred costs are to be recoverable by PGE with no sharing mechanism.
- d. Spread/Rate Design: In Docket UE 237, Commission Staff and parties agreed that Schedule 137 costs be allocated to each schedule (all customer classes) based on an equal percent of generation revenue applied on a cents per kilowatt-hour basis.
- e. Three Percent test: The amortization of the deferred costs will be subject to the three percent test in accordance with ORS 757.259(7) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

¹ Per agreement with OPUC staff on January 24, 2012

VI. Conclusion.

For the reasons stated above, and as necessary to enable cost recovery under an AAC, PGE requests permission to continue to defer expenses associated with the Solar Payment Option Pilot effective May 7, 2017, through May 6, 2018.

DATED May XX, 2017.

Maec Coody for Stefan Brown
Stefan Brown
Manager, Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7857
Fax: 503.464.7651
E-Mail: pge.opuc.filings@pgn.com

um 1482_pge reauth application_(5-05-17).docx

UM 1482

Attachment A

**Notice of Application for Reauthorization to Defer Expenses
Associated with a Photovoltaic Volumetric Incentive Rate Pilot,
Aka, the Solar Payment Option Pilot**

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1482**

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot

Notice Of Application for Reauthorization To Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot aka the Solar Payment Option Pilot

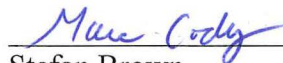
On May 5, 2017, Portland General Electric Company (“PGE”) filed an application with the Oregon Public Utility Commission (the “Commission”) for an Order authorizing deferral of certain expenses associated with a Photovoltaic Volumetric Incentive Rate Pilot, also known as PGE Solar Payment Option Pilot.

Approval of PGE’s Application will not authorize a change in PGE’s rates, but may facilitate the Commission allowing such deferred amounts in rates through an automatic adjustment clause.

Persons who wish to obtain a copy of PGE’s application will be able to access it on the Commission website.

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than June 6, 2017.

DATED this 5th day of May, 2017.



Stefan Brown
Manager, Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.8929
Fax: 503.464.7651
E-Mail: pge.opuc.filings@pgn.com

**UM 1482
Attachment B**

**Solar Payment Option
Deferral Amounts and Program Cost**

Electronic File

SPO Deferral	SPO 2010	SPO 2011 Program	SPO 2012	SPO 2013	SPO 2014	SPO 2015	SPO 2016 Program Year												Balance To Date		
	Program Year	Year	PROGRAM YEAR	Program Year	Program Year	Program Year	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16		2016 Total	
Cost Categories	2010 Total	2011 Total	2012 Total	2013 Total	2014 Total	2015 Total													2016 Total		
Program Development	60,476.88	-	-	-	-	-													-	60,476.88	
Program Administration	153,347.61	242,719.23	294,112.10	660,749.71	537,259.36	541,434.88	48,487.04	20,742.52	25,561.43	29,793.43	26,036.74	25,674.66	38,967.96	22,592.32	22,784.25	60,424.64	21,578.25	19,359.23	362,002.47	2,791,625.36	
Incentives / Bill Credits	20,257.35	1,270,737.77	3,169,821.71	4,909,698.83	6,357,460.64	6,573,745.18	239,873.32	246,027.11	380,332.33	542,751.55	591,933.37	799,632.36	1,083,592.55	798,855.61	873,817.19	524,863.41	329,294.89	367,310.58	6,778,284.27	29,080,005.75	
Interest	4,635.58	64,092.08	11,515.21	(3,450.22)	5,274.03	21,935.93	1,285.93	927.60	915.62	1,137.15	1,452.32	1,914.38	2,697.73	3,479.44	4,203.06	4,795.14	5,070.32	5,181.37	33,060.06	137,062.67	
Metering	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Cost Total	238,717.42	1,577,549.08	3,475,449.02	5,566,998.32	6,899,994.03	7,137,115.99	289,646.29	267,697.23	406,809.38	573,682.13	619,422.43	827,221.40	1,125,258.24	824,927.37	900,804.50	590,083.19	355,943.46	391,851.18	7,173,346.80	32,069,170.66	
Credit Categories																					
Deposit Forfeitures	1,383.20	3,968.40	6,973.55	88,220.80	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100,545.95	
Collection of Interconnection Application Fee	2,288.63	5,124.40	5,435.14	5,654.63	2,666.20	1,407.83	-	-	-	-	-	1,398.68	-	-	-	-	-	-	1,398.68	23,975.51	
Customer Charges	966.67	26,947.76	56,642.29	107,601.14	141,014.69	153,826.72	12,841.00	13,468.68	14,805.67	13,569.01	13,535.67	14,398.00	13,017.68	14,919.67	13,622.67	13,414.34	13,277.65	13,620.00	164,490.04	651,489.31	
One Time Assignment Fee	50.00	3,825.00	9,635.40	6,750.00	2,050.00	499.44	-	-	-	-	-	-	-	-	-	-	-	-	-	22,809.84	
Avoided Energy Value	1,249.71	76,053.69	220,762.87	400,832.46	581,456.47	573,392.16	-	-	-	-	131,321.37	-	113,622.55	-	-	-	-	-	244,943.92	2,098,691.28	
Unbilled Amortization	-	-	-	-	-	-	316,000.00	(28,000.00)	35,000.00	(30,000.00)	32,000.00	9,000.00	12,000.00	49,000.00	(86,000.00)	58,000.00	25,000.00	85,000.00	477,000.00	477,000.00	
Amortization	-	-	4,808,006.23	4,997,431.92	5,051,152.06	6,247,784.42	779,863.18	652,554.47	617,249.39	583,974.88	556,813.91	597,320.13	592,000.36	619,579.53	636,477.14	564,111.74	581,681.43	716,786.01	7,498,412.17	28,602,786.80	
Credit Total	5,938.21	115,919.25	5,107,455.48	5,606,490.95	5,778,339.42	6,976,910.57	1,108,704.18	638,023.15	667,055.06	567,543.89	733,670.95	622,116.81	730,640.59	683,499.20	564,099.81	635,526.08	619,959.08	815,406.01	8,386,244.81	31,977,298.69	
Deferral Amount in GL	232,779.21	1,461,629.83	(1,632,006.46)	(39,492.63)	1,121,654.61	160,205.42	(819,057.89)	(370,325.92)	(260,245.68)	6,138.24	(114,248.52)	205,104.59	394,617.65	141,428.17	336,704.69	(45,442.89)	(264,015.62)	(423,554.83)	(1,212,898.01)	91,871.97	
Program Administration Cost Breakdown:																					
Epiq Class Action Claim - Total								672.00	-	-	2,877.78	724.00	856.50	-	370.00	1,201.00	-	314.61	-	7,015.89	278,813.90
Research into Action, Inc. - Total								-	-	-	-	-	-	-	-	-	-	-	-	-	255,283.70
Price Waterhouse Coopers - Total								-	-	-	-	-	-	-	-	-	-	-	-	-	25,000.00
Adecco USA - Total								-	-	-	-	-	-	-	-	-	-	-	-	-	114,033.66
Incremental Labor (Not Adecco)								47,777.04	20,742.52	25,561.43	26,915.65	25,312.74	24,173.36	38,968.36	22,222.32	21,583.25	60,424.64	21,263.64	19,359.23	354,304.18	2,328,844.86
Miscellaneous								38.00	-	-	-	-	-	-	-	-	-	-	-	38.00	186,547.17
Pay Pal Fees								-	-	-	-	644.80	(0.40)	-	-	-	-	-	-	644.40	25,581.42
							\$0.00	\$48,487.04	\$20,742.52	\$25,561.43	\$29,793.43	\$26,036.74	\$25,674.66	\$38,967.96	\$22,592.32	\$22,784.25	\$60,424.64	\$21,578.25	\$19,359.23	\$362,002.47	3,214,104.71

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the UM 1482 **Notice Of Application for Reauthorization To Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, aka PGE Solar Payment Option Pilot** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service lists in UM 1482 and UE 319.

DATED at Portland, Oregon, this 5th day of May 2017.

Mac Costy

Stefan Brown
Manager, Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503-464-8929
Fax: 503-464-7651
E-Mail: pge.opuc.filings@pgn.com

um 1482_pge reauth application_(5-05-17).docx

**UM 1482
SERVICE LIST**

OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

RENEE M FRANCE
OREGON DEPARTMENT OF JUSTICE

NATURAL RESOURCES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
renee.m.france@doj.state.or.us

ROBERT JENKS
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
bob@oregoncub.org

JUDY JOHNSON
PUBLIC UTILITY COMMISSION OF OREGON

PO BOX 1088
SALEM OR 97308-1088
judy.johnson@state.or.us

BRADLEY MULLINS
MOUNTAIN WEST ANALYTICS

333 SW TAYLOR STE 400
PORTLAND OR 97204
brmullins@mwanalytics.com

TYLER C PEPPE
DAVISON VAN CLEVE, PC

333 SW TAYLOR SUITE 400
PORTLAND OR 97204
tcp@dvclaw.com

WENDY SIMONS
*OREGON DEPARTMENT OF ENERGY

625 MARION ST NE
SALEM OR 97301
wendy.simons@oregon.gov

DOUGLAS C TINGEY
PORTLAND GENERAL ELECTRIC

121 SW SALMON 1WTC1301
PORTLAND OR 97204
doug.tingey@pgn.com

JAY TINKER
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST 1WTC-0306
PORTLAND OR 97204
pge.opuc.filings@pgn.com

MICHAEL T WEIRICH
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@state.or.us

KARLA WENZEL
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST. 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

UE 319 SERVICE LIST

CALPINE ENERGY

GREGORY M. ADAMS (C)
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)
ENERGY STRATEGIES LLC

215 STATE ST - STE 200
SALT LAKE CITY UT 84111-2322
khiggins@energystrat.com

FRED MEYER UE 319

KURT J BOEHM (C)
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

JODY KYLER COHN
BOEHM, KURTZ & LOWRY

36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkylere@bkllawfirm.com

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

MYRALEIGH ALBERTO (C)
DAVISON VAN CLEVE

333 SW TAYLOR STE 400
PORTLAND OR 97204
maa@dvclaw.com

BRADLEY MULLINS (C)
MOUNTAIN WEST ANALYTICS

333 SW TAYLOR STE 400
PORTLAND OR 97204
brmullins@mwanalytics.com

TYLER C PEPPE (C)
DAVISON VAN CLEVE, PC

333 SW TAYLOR SUITE 400
PORTLAND OR 97204
tcp@dvclaw.com

OREGON CITIZENS UTILITY BOARD

OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

ROBERT JENKS (C)
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
bob@oregoncub.org

ELIZABETH JONES (C)
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97206
liz@oregoncub.org

PACIFICORP UE 319

PACIFICORP, DBA PACIFIC POWER

825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

MATTHEW MCVEE
PACIFICORP

825 NE MULTNOMAH
PORTLAND OR 97232
matthew.mcvee@pacificorp.com

PGE UE 319

STEFAN BROWN (C)
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST, 1WTC0306
PORTLAND OR 97204
stefan.brown@pgn.com

DOUGLAS C TINGEY
PORTLAND GENERAL ELECTRIC

121 SW SALMON 1WTC1301
PORTLAND OR 97204
doug.tingey@pgn.com

JAY TINKER (C)
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST 1WTC-0306
PORTLAND OR 97204
pge.opuc.filings@pgn.com

SBUA UE 319

JAMES BIRKELUND (C)
SMALL BUSINESS UTILITY ADVOCATES

548 MARKET ST STE 11200
SAN FRANCISCO CA 94104
james@utilityadvocates.org

DIANE HENKELS (C)
CLEANTECH LAW PARTNERS PC

420 SW WASHINGTON ST STE 400
PORTLAND OR 97204
dhenkels@cleantechlaw.com

STAFF UE 319

STEPHANIE S ANDRUS (C)
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

MARIANNE GARDNER (C)
PUBLIC UTILITY COMMISSION OF OREGON

PO BOX 1088
SALEM OR 97308-1088
marianne.gardner@state.or.us

SOMMER MOSER (C)
PUC STAFF - DEPARTMENT OF JUSTICE

1162 COURT ST NE
SALEM OR 97301
sommer.moser@doj.state.or.us

WALMART UE 323

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