



Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

December 29, 2021

Via Electronic Filing

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

**RE: UM 1301 Portland General Electric Company Application for Deferral of 2007
Quarterly Direct Access Open Enrollment Costs/Benefits**

Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Direct Access Open Enrollment Costs/Benefit pursuant to Commission Order No. 21-034.

A notice regarding the filing of this application has been sent to the parties on the UE 394 and UM 1301 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 1301

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Direct Access Open
Enrollment Costs/Benefits

**PORTLAND GENERAL ELECTRIC
COMPANY APPLICATION FOR
DEFERRAL REAUTHORIZATION**

Pursuant to ORS 757.259, OAR 860-027-0300, and the Public Utility Commission of Oregon (Commission or OPUC) Order No. 21-034, Portland General Electric Company (PGE) hereby requests reauthorization to continue to defer for later ratemaking treatment certain costs or benefits associated with implementation of PGE’s direct access open enrollment windows¹ from January 1, 2022 through December 31, 2022 (Deferral Period).

I. Deferral History

On September 14, 2006, the Commission adopted the Direct Access Stipulation in Order No. 06-528. PGE and parties entered into, and the Commission approved a stipulation by which PGE would offer quarterly direct access enrollment windows in addition to its annual November election window. The stipulation was made a part of Commission Order No. 07-015 and PGE filed tariff Schedule 128 in compliance with that Order.

On February 1, 2007, PGE filed a request for approval to defer costs and benefits associated with its 2007 Quarterly Direct Access Open Enrollment Windows pursuant to the Commission Orders referenced above. The quarterly deferral was authorized by Commission Order No. 07-

¹ The direct access windows include PGE’s annual and balance-of-year open enrollment window provided through PGE’s Schedule 128.

108 and the request to continue the deferral is filed pursuant to Commission Order No. 21-034 and ORS §757.259. On March 17, 2008, the Commission determined that the costs and benefits associated with PGE's Annual Direct Access Window are appropriately included in this deferral, i.e., UM 1301. See Commission Order No. 08-169 (Docket UM 1359).

On February 23, 2012, Commission Order No. 12-057 (Docket No. UE 236) reduced the quarterly windows to one, effective April 1 of each year. The balance-of-year window now provides Schedule 128-eligible customers the opportunity to move to direct access service or an applicable non-cost-of-service pricing option for the balance of the calendar year.

The financial impact of customer decisions during the balance-of-year and Annual Direct Access Windows is based on the amount of customer load that selects non-cost of service pricing and the changes in wholesale market prices used to set the transition adjustment rates (Schedule 128 rates) for each enrollment period. Amounts calculated pursuant to this mechanism will be deferred if the difference in market prices and the load leaving PGE's cost-of-service rate exceeds \$60,000 in the balance-of-year period or \$240,000 for the annual election as specified in Schedule 128.

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

Table 1

Filing Date	Renewal Period	Order No.
1/17/08	2/01/08 – 1/31/09	08-153
1/23/09	2/01/09 – 1/31/10	09-070
1/20/10	2/01/10 - 1/31/11	10-075
1/20/11	2/01/11 – 1/31/12	11-058
1/20/12	2/01/12 - 1/31/13	12-064
1/28/13	2/01/13 – 12/31/13	13-082
12/20/13	1/01/14 – 12/31/14	14-022
12/22/14	1/01/15 – 12/31/15	15-023
12/18/15	1/01/16 – 12/31/16	16-038
12/01/16	1/01/17 – 12/31/17	17-109
12/04/17	1/01/18 – 12/31/18	18-034
11/14/18	1/01/19 – 12/31/19	19-045
11/30/19	1/01/20 – 12/31/20	20-032
12/29/20	1/01/21 – 12/31/21	21-034

II. OAR 860-027-0300 Requirements

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

A. Description of Amounts

The deferred amount for any given Deferral Period is a function of the difference in wholesale market prices used to set transition adjustment rates (Schedule 128) for each direct access enrollment window, and the amount of customer load that selects non-cost of service energy pricing and supply. The current deferral balance is approximately \$261,000 associated with the 2020 annual November enrollment window. PGE will set the amortization for this \$261,000 in 2022 through Schedule 105. PGE cannot provide an estimate of the deferred amount for Deferral Period 2022 until the results of the applicable direct access windows are available.

B. Reasons for Deferral

PGE seeks reauthorization to continue to defer costs or benefits associated with direct access open enrollment windows incurred from January 1, 2022 through December 31, 2022. Any costs or benefits associated with the deferral will be considered later for appropriate rate-making treatment. Without reauthorization, this deferral will expire on December 31, 2021. The deferral provides a mechanism for PGE to track the cost or benefit of open enrollment options and defer those costs or benefits for later rate-making treatment. PGE will seek amortization of any deferred amount in a later proceeding. The continuation of the deferral will minimize the frequency of rate changes or fluctuations pursuant to ORS 757.259(2)(e), and 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 128.

C. Proposed Accounting

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets) with an off-setting credit to FERC Account 447 (Sales for Resale) or as a regulatory liability in FERC Account 254 (Other Regulatory Liabilities) with an off-setting debit to FERC Account 447 (Sales for Resale). In the absence of a deferral order, PGE would record the revenues associated with the deferred amount in FERC Account 447 (Sales for Resale).

D. Estimate of Amounts

See II (a) above. PGE requests that, in accordance with ORS 757.259(4), it be allowed to continue to accrue interest on the unamortized balance at a rate equal to its authorized weighted average cost of capital. Subsequently, interest will accrue at the modified blend treasury rate set by the Commission for the amortization of deferred accounts.

E. Notice

A copy of the Notice of Application for Reauthorization to Defer Direct Access Open Enrollment Costs or Benefits 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. Description of deferred account entries

Please see sections (II)(a) and II(c) above.

b. The reason for continuing deferred accounting

Pursuant to Commission Order No. 21-034 and as described in Section II(b) above, PGE seeks approval to continue to defer the costs or benefits associated with its Direct Access Open Enrollment Costs from January 1, 2022 through December 31, 2022. Without reauthorization, this deferral will expire on December 31, 2021.

IV. PGE Contacts

The authorized addresses to receive notices and communications in respect of 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 should not be required, because, as stated in the OPUC Staff Memo for PGE Advice No. 13-24, which the Commission approved at the December 19, 2013 OPUC Public Meeting, the deferred costs are of the sort that should be borne by customers.

B. Prudence Review

A prudence review will be performed by the OPUC Staff and should include a verification of the accounting methodology used to determine the final amortization balance.

C. Sharing

All costs should flow to customers per the Staff Memo described in part V(a) above.

D. Rate Spread/Rate Design

The amortization of any deferred amount will be spread on a per-kWh basis to applicable Large Nonresidential customers as specified in Schedule 128.

E. Three Percent Test (ORS 757.259(6))

The amortization of the deferred costs will be subject to the three percent test in accordance with the 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.

VI. Conclusion

For the reasons stated above, PGE requests permission to continue to defer certain Direct Access Open Enrollment Costs or Benefits 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
Direct Access Open Enrollment Costs/Benefits**

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1301

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Direct Access Open
Enrollment Costs/Benefits

**PORTLAND GENERAL ELECTRIC
COMPANY NOTICE OF
APPLICATION FOR DEFERRAL
REAUTHORIZATION**

On December 29, 2021, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (Commission) for an Order reauthorizing deferral of direct access open enrollment costs or benefits pursuant to Order Nos. 07-015 and 21-034, and PGE Schedule 128.

Approval of PGE's Application 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 Commission 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 **Notice of Application for Reauthorization to Defer Direct Access Open Enrollment Costs/Benefits** to be served by electronic mail to those parties whose email addresses appear on the attached service lists for Docket No. UE 394 and UM 1301.

DATED at Portland, Oregon, 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

Service List
OPUC Docket UE 394

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

610 SW BROADWAY STE 400
PORTLAND OR 97205

Service List
OPUC Docket UE 394

BOARD

mike@oregoncub.org

PGE

PORTLAND 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
SMALL BUSINESS UTILITY
ADVOCATES

621 SW MORRISON ST. STE 1025
PORTLAND OR 97205
diane@utilityadvocates.org

STAFF

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

JILL D GOATCHER (C)
PUC STAFF--DEPARTMENT 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

MADLILNE MALMQUIST (C)
WALMART

madelinemalmquist@parsonsbehle.com

Service List
OPUC Docket UE 394

PGE RATES & REGULATORY AFFAIRS	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com
STEPHANIE S ANDRUS PUC STAFF--DEPARTMENT 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
MITCH MOORE PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 mitch.moore@puc.oregon.gov
DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC	121 SW SALMON 1WTC1301 PORTLAND OR 97204 doug.tingey@pgn.com