



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

December 30, 2019

Via electronic mailing
puc.filingcenter@state.or.us

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

Attn: OPUC Filing Center

**RE: UM 1301 PGE's Application for Reauthorization to Defer Direct
Access Open Enrollment Costs/Benefits**

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Direct Access Open Enrollment Costs/Benefits.

PGE received authorization pursuant to Commission Order No. 19-045. A notice regarding the filing of this application has been sent to the parties on the UM 1301 and UE 335 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at 503-464-7805. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pge.com.

Sincerely,

A handwritten signature in blue ink that reads "Jaki Ferchland". The signature is written in a cursive, flowing style.

Jaki Ferchland
Manager, Revenue Requirement

JF/np:

Enclosure

cc: Mitch Moore, OPUC
Service List: UM 1301 and UE 335

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1301

**In the Matter of the Application of Portland
General Electric Company for an Order
Approving the Deferral of Direct Access Open
Enrollment Costs/Benefits**

**Application for Reauthorization to
Defer Direct Access Open Enrollment
Costs/ Benefits**

Pursuant to ORS 757.259, OAR 860-027-0300, and the Public Utility Commission of Oregon (“Commission” or “OPUC”) Order No. 19-045, 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, 2020 through December 31, 2020 (“Deferral Period 2020”).

I. Deferral History

On September 14, 2006, the Commission adopted the Direct Access Stipulation in Order No. 06-528 in consolidated Dockets UE 180 (Request for General Rate Revision), UE 181 (Annual Adjustments to Schedule 125 (2007 Resource Valuation Mechanism Filing), and UE 184 (Request for a General Rate Revision related to the Port Westward Plant). 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.

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

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 and pursuant to the Commission Orders referenced above. The quarterly deferral was authorized by Commission Order No. 07-108 and the request to continue the deferral is filed pursuant to Commission Order No. 16-038 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.	Approval Date
1/17/08	2/01/08 – 1/31/09	08-153	3/04/08
1/23/09	2/01/09 – 1/31/10	09-070	3/02/09
1/20/10	2/01/10 - 1/31/11	10-075	3/02/10
1/20/11	2/01/11 – 1/31/12	11-058	2/16/11
1/20/12	2/01/12 - 1/31/13	12-064	2/28/12
1/28/13	2/01/13 – 12/31/13	13-082	3/13/13
12/20/13	1/01/14 – 12/31/14	14-022	1/22/14
12/22/14	1/01/15 – 12/31/15	15-023	2/28/15
12/18/15	1/01/16 – 12/31/16	16-038	1/26/16
12/01/16	1/01/17 – 12/31/17	17-109	3/21/17
12/04/17	1/01/18 – 12/31/18	18-034	2/01/18
11/14/18	1/01/19 – 12/31/19	19-045	2/15/19

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 open enrollment window, and the amount of customer load that selects non-cost of service energy pricing and supply. The current deferral balance is approximately (\$1,075,000) associated with the 2018 annual November enrollment window. PGE will set the amortization for this \$1,075,000 in 2020 through Schedule 105. PGE cannot provide an estimate of the deferred amount for Deferral Period 2020 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, 2020 through December 31, 2020. 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, 2019. 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), 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 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 (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 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

Pursuant to Commission Order No. 19-045 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, 2020 through December 31, 2020. Without reauthorization, this deferral will expire on December 31, 2019.

IV. PGE Contacts

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

Douglas C. Tingey
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
Phone: 503.464.8926
E-mail: doug.tingey@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Phone: 503.464.7805
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:

Jaki Ferchland, Manager, Revenue Requirement
E-mail: 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 three percent test measures the annual overall effect 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. The limit of these deferrals, if any will be determined at the time of amortization.

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, 2020 through December 31, 2020.

DATED: December 30, 2019.

Respectfully Submitted,



Jaki Ferchland
Manager, Revenue Requirement
On Behalf of Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, Oregon 97204
Phone: 503.464.7805
E-Mail: pge.opuc.filings@pgn.com

UM 1301

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 the Application of
Portland General Electric Company for
an Order Approving the Deferral of
Direct Access Open Enrollment
Costs/Benefits**

**Notice of Application for Reauthorization
to Defer Direct Access Open Enrollment
Costs/ Benefits**

On December 30, 2019, 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 Commission Order Nos. 07-015 and 19-045, and PGE tariff 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 30, 2020.

Dated this 30th day of December 2019.

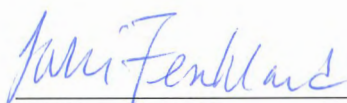


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On Behalf of Portland General Electric Company
121 SW Salmon Street, 1WTC0306
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Phone: 503.464.7805
E-Mail: pge.opuc.filings@pgn.com

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 335 and UM 1301.

DATED at Portland, Oregon, this 30th day of December 2019.



Jaki Ferchland
Manager, Revenue Requirement
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**SERVICE LIST
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NO. UM 1301**

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