

January 20, 2010

#### Via E-Mail and US Mail

Public Utility Commission Attention Filing Center 550 Capitol Street NE, Ste. 215 Salem, OR 97308.

RE: UM-1417 PGE's Application for Reauthorization of Deferred Accounting of Revenues Associated with an ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery

Enclosed for filing are an original and one copy of Portland General Electric Company's (PGE) Application for Reauthorization of deferred accounting of Revenues Associated with an ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery. PGE received authorization pursuant to OPUC Order No. 09-162.

We have provided copies of the Notice of Application for Reauthorization to the UE-197 service list. PGE waives paper service of documents in this proceeding and has E-filed a copy on this date.

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.

Sincerel/

Patrick G. Hager

Manager, Regulatory Affairs

Encls.

cc: Carla Owings, OPUC
Bob Jenks, CUB
Melinda Davison, ICNU
197 Service List [notice only]

#### 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 ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery

Application for Reauthorization of Deferral of Revenues Associated with ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery

Pursuant to ORS 757.259 and OAR 860-027-0300, and OPUC Order Nos. 08-169, 09-020 and 09-162, Portland General Electric Company (PGE) hereby requests reauthorization to defer for later rate-making treatment revenues associated with 1) an ROE refund, and 2) a Sales Normalization Adjustment (SNA) and Lost Revenue Recovery mechanism (LRR), implemented through Schedule 123.

#### I. Deferral History.

In Docket No. UE 197, PGE proposed a SNA and a LRR mechanism. The Commission approved the SNA and LRR mechanisms in Order No. 09-020 subject to the following conditions:

PGE's authorized ROE shall be reduced by ten (10) basis points and PGE should file an application to defer the revenue-requirement effect of this change until it can be reflected in base rates; and

The SNA and LRR mechanisms will terminate two years after the effective date of the approved tariffs unless extended by the Commission. PGE may request an extension of the mechanism or a revised mechanism no later than three months before the scheduled expiration of the tariffs. To allow a full review of PGE's costs, the Commission may condition extensions of the existing, or a modified, mechanism on the filing of a general rate case.

The original deferral received authorization through Commission Order No. 09-162, on May 6, 2009. PGE requests this reauthorization commence effective February 1, 2010, through January 31, 2011.

#### II. OAR 860-027-0300 Requirements

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

#### a. <u>Description of Amounts</u>

See Deferral History above. As of the first nine months of 2009, PGE has accrued a refund to customers of approximately \$4 million related to the ROE refund and the SNA.

#### b. Reasons for Deferral

PGE seeks reauthorization to defer costs associated with the revenues associated with the SNA and LRR mechanisms and the refund of Return on Equity (Schedule 123). Without the reauthorization, this deferral will expire on January 31, 2010. 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 or by and benefits received by customers. PGE will seek amortization of any deferred amount in a later proceeding. Any costs or benefits associated with the deferral will be considered later for appropriate rate-making treatments in an actual rate-making proceeding.

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 three separate accounts for the ROE refund and the LRR and SNA mechanisms. For the ROE refund, we propose to credit FERC account 229 (Accumulated Provision for Rate Refunds), debiting FERC account 449.1 (Provision for Rate Refunds). For the LRR and SNA accounts, 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 254 (Regulatory Liabilities) if the deferred amount is to be refunded to customers. The corresponding debit or credit for the LRR and SNA accounts is to FERC account 456 (Other Revenue). In the absence of a deferred accounting order from the Commission, PGE would record the revenues associated with all three deferred accounts in FERC accounts 440 (Residential Sales), and 442 (Commercial/Industrial Sales). As indicated in Order No. 09-020, the three deferred accounts will accrue interest at the blended Treasury rate. PGE began deferring amounts for the ROE refund, and the SNA and LRR mechanisms as of the effective date of Schedule 123, February 1, 2009.

#### d. Estimate of Amounts

PGE estimates the deferred amount associated with one change to the authorized ROE to be a credit (refund) of approximately \$1.9 million annually. The amounts to be deferred pursuant to the SNA and LRR 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 197 pursuant to PGE's Schedule 123. The LRR difference is based on energy efficiency savings as reported by the ETO and savings incorporated in the applicable load forecast.

#### e. <u>Notice</u>

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. <u>Description of deferred account entries</u>

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 refund of Return on Equity, the SNA and the LRR mechanisms (Schedule 123) between February 1, 2010 and January 31, 2011 as described in II(b) above. Without reauthorization this deferral will expire on January 31, 2010.

#### IV. PGE Contacts

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

Randy Dahlgren Rates & Regulatory Affairs Portland General Electric, 1 WTC0702 121 SW Salmon Street Portland, Oregon 97204 Phone: 503.464.7857

E-mail: pge.opuc.filings@pgn.com

Douglas C. Tingey
Assistant General Counsel
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1 WTC1301
121 SW Salmon Street
Portland, Oregon 97204
Phone: 503.464.8926

E-mail: Doug.Tingey@pgn.com

PGE waives paper service in this proceeding. In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Marc Cody,

Senior Analyst, Pricing and Tariffs

E-mail: Marc.Cody@pgn.com

Jay Tinker,

Project Manager, Regulatory Affairs

E-mail: Jay.Tinker@pgn.com

#### V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer for later rate-making treatment revenues associated with ROE refund, as well as a SNA and LRR recovery mechanisms.

DATED this 20th day of January, 2010

Patrick G. Hager

Manager, Régulatory Affairs

Portland General Electric Company

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### Attachment A

Notice of Application for Reauthorization of Deferral of Revenues Associated with ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery

# 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 ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery Notice of Application for Reauthorization of Deferral of Revenues Associated with ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery

On January 20, 2010, Portland General Electric Company (PGE) filed an Application for Reauthorization of Deferral of Revenues Associated with ROE Refund and 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 February 20, 2010.

Dated this 20<sup>th</sup> day of January, 2010

Patrigk G. Hager

Manager, Regulatory Affairs

Portland General Electric Company

121 SW Salmon Street, 1WTC0702

Portland, OR 97204

Telephone:

503-464-7580

Fax:

503-464-7651

#### CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing Notice of Application for Reauthorization of Deferral of Revenues Associated with ROE Refund and Sales Normalization Adjustment and Lost Revenue Recovery (UM-1417) to be served by Electronic Mail to those parties whose e-mail addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, upon those parties on the attached service list who have not waived paper service from OPUC Docket No. UE 197.

Dated at Portland, Oregon, this January 20, 2010.

Patrick G. Hager

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Printed: 1/20/2010

Summary Report

**UE 197 PORTLAND GENERAL ELECTRIC** 

Category: Electric Rate Case

Filed By: PORTLAND GENERAL ELECTRIC

This filing requests a general rate revision.

Filing Date: 2/27/2008

Advice No: 08-02

Effective Date: 1/1/2009

Expiration Date: 12/31/2008

Status: PERM SUSPEND

See also: UE 198

08-23

Final Order: 09-176

Signed: 2/27/2008

SERVICE LIST:

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Printed: 1/20/2010

## Summary Report UE 197 PORTLAND GENERAL ELECTRIC

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