



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

March 15, 2021

Via Electronic Filing

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St, SE, Ste. 100  
PO Box 1088  
Salem, OR 97308-1088

**Re: UM 1789 / UE 311 / UP 344 – Prudence Review of Portland General Electric’s  
Portland Harbor Environmental Remediation Account (PHERA)**

In accordance with Commission Order No. 17-071, dated March 2, 2017, enclosed is the following:

- 1) Confidential Attachment 1: PGE’s Annual Report on the Portland Harbor Environmental Remediation Account (PHERA), which provides a summary of all Environmental Remediation Costs (ERCs), Environmental Remediation Revenues (ERRs), and Harborton Restoration Project Development Costs recorded in the PHERA Annual Account as of December 31, 2020.
- 2) Confidential Attachment 2: Written Report of all activities associated with ERCs, ERRs, and the Harborton Restoration Project Development Costs, recorded in the PHERA Annual Account as of December 31, 2020.
- 3) Confidential Attachment 3: PHERA 2020 Annual Account activity and interest calculations.
- 4) Confidential Attachment 4: PHERA 2020 Annual Allocated Revenue and Balancing Account interest calculations.
- 5) Confidential Attachment 5: Transaction level details of PGE’s 2020 ERCs associated with Portland Harbor Superfund, Downtown Reach, and legal support.
- 6) Confidential Attachment 6: Transaction level details of PGE’s 2020 development costs associated with the Harborton Restoration Project.
- 7) Confidential Attachment 7: Invoices including descriptions of work performed at the Portland Harbor and Downtown Reach sites, and for legal support.
- 8) Confidential Attachment 8: Invoices including descriptions of work performed at the Harborton Restoration Project.

All amounts reported represent transactions that occurred between January 1, 2020, and December 31, 2020.

This report, which is protected information subject to protective Order No. 16-270, covers the reporting requirements set forth in Commission Order No. 17-071.

Should OPUC Staff need additional information to complete its prudence review, PGE will make it available per request. Should you have any questions or require further information, please call Stefan Cristea at 503-464-8033.

Sincerely,

*/s/ Jaki Ferchland*

/s/ Jaki Ferchland  
Manager, Revenue Requirement

JF/np  
Enclosures

**UM 1789 / UE 311 / UP 344**

**Attachment 1**

**Confidential and Subject to Protective Order No. 16-270**

PGE Portland Harbor Environmental Remediation Account  
Annual Report

**UM 1789 / UE 311 / UP 344**

**Attachment 2**

**Confidential and Subject to Protective Order No. 16-270**

PGE Portland Harbor Environmental Remediation Account  
Annual Report of Activities

**UM 1789 / UE 311 / UP 344**

**Attachment 3**

**Confidential and Subject to Protective Order No. 16-270**

PGE PHERA  
Annual Account Report and Interest Calculations

**UM 1789 / UE 311 / UP 344**

**Attachment 4**

**Confidential and Subject to Protective Order No. 16-270**

**PGE PHERA Annual Allocated Revenue and Balancing Account  
Interest Calculations**

**UM 1789 / UE 311 / UP 344**

**Attachment 5**

**Confidential and Subject to Protective Order No. 16-270**

Portland Harbor, Downtown Reach, and Legal 2020 ERCs  
Transaction Level Details

**UM 1789 / UE 311 / UP 344**

**Attachment 6**

**Confidential and Subject to Protective Order No. 16-270**

Harborton Restoration Project  
2020 Development Costs - Transaction Level Details



**UM 1789 / UE 311 / UP 344**

**Attachment 7**

**Confidential and Subject to Protective Order No. 16-270**

Invoices for 2020 ERCs Associated with Portland Harbor, Downtown  
Reach, and Legal

**UM 1789 / UE 311 / UP 344**

**Attachment 8**

**Confidential and Subject to Protective Order No. 16-270**

Invoices for 2020 ERCs Associated with the Harborton Restoration  
Project