



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

February 21, 2020

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street, Ste. 100
P. O. Box 1088
Salem, OR 97308-1088

**Re: UM _____ PGE's Application for Authorization to Defer Costs and Revenues
Associated with Transportation Electrification Pilots**

Enclosed for filing is Portland General Electric Company's ("PGE") Supplement to its April 23, 2018 Application for Authorization to Defer Costs and Revenues Associated with Transportation Electrification Pilot, and its April 23, 2019 Application for Reauthorization of the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UM 1938 service list.

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@pgn.com.

Sincerely,

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

Jaki Ferchland
Manager, Revenue Requirement

JF/np

Enclosure
cc: Service List: UM 1938

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1938

**In the Matter of the Application of Portland) Supplement to Application for
General Electric Company for an Order) Authorization to Defer the Costs
Approving the Deferral of Costs and) and Revenues Associated with
Revenues Associated with Transportation) Transportation Electrification Pilots
Electrification Pilots)**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (“PGE”) hereby respectfully supplements its requests for authorization to defer the costs and revenues associated with the three Transportation Electrification Pilots (“TE Pilots”) approved by Public Utility Commission of Oregon (“Commission” or “OPUC”) Order No. 18-054 (Docket No. UM 1811).

I. Deferral Status

On April 23, 2018, PGE filed its initial request to defer the costs and revenues associated with the TE Pilots. On April 23, 2019, PGE filed its first request to reauthorize the deferral. Because the Commission has not yet approved PGE’s request for deferred accounting and because the conditions related to the deferral have changed, PGE proposes to modify the following aspects of the previous UM 1938 applications.

Initial Proposals to Modify:

- PGE requested that the deferral would support an automatic adjustment clause (“AAC”) rate schedule for the Pilots’ 10-year period.
- PGE proposed the deferral of capital costs associated with the TE Pilots or the tracking in of capital costs through the AAC.

- Section I.C., “Proposed Accounting” – PGE stated that in the absence of approval of a cost recovery mechanism from the Commission, PGE would not implement the Pilots.
- Section II.A., “Earnings Review” – PGE proposed that cost recovery associated with the Pilots not be subject to an earnings review since it would be subject an automatic adjustment clause.

Proposed Modifications:

- PGE has withdrawn Schedule 150 and proposes that the requested deferral not support an AAC. Instead, amortization of the TE pilots will be determined in a future Commission proceeding.
- PGE does not seek either the deferral, or tracking in, of capital costs associated with the TE Pilots. Instead, the only costs to which the requested deferral would apply are operations and maintenance expenses (“O&M”).
- Section I.C., “Proposed Accounting” – in the absence of a deferred accounting order from the Commission, PGE would not implement the TE Pilots.
- Section II.A., “Earnings Review” – recovery of the TE Pilots’ costs will be subject to an earnings review in accordance with ORS 757.259(5).

Description of Amounts:

Table 1, below, provides a summary of the O&M costs that PGE has incurred since the Pilots’ inception plus the current forecast for 2020 (see work papers for additional detail).

Table 1
Pilot Costs 2018-2020 (000's)

| Pilot | 2018 Actuals | 2019 Actuals | 2020 Forecast |
|------------------------|-------------------------|-------------------------|--------------------------|
| Electric Avenue | \$221 | 0 | 0 |
| TriMet | \$30 | 0 | 0 |
| Education and Outreach | \$35 | \$81 | \$352 |
| Evaluation | \$23 | 0 | 0 |
| Totals | \$309 | \$81 | \$352 |

II. Conclusion

For the reasons stated in the April 23, 2018 and April 23, 2019 applications and with the above-noted modifications, PGE requests that the Commission issue an order granting its request to defer the costs and revenues associated with the TE Pilots. As noted in the Amended Stipulation adopted by Commission Order No. 19-385, "The Stipulating Parties agree that all revenues and O&M costs associated with these three pilots and the required pilot evaluation shall be deferred in a deferred account. PGE proposes to track all revenues and costs in a balancing account, and potentially net these values as they are received or incurred."

DATED this February 21, 2020.

Respectfully Submitted,



Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
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Attachment A

Notice of Supplement to Application for Authorization to Defer the Costs and Revenues Associated with the Transportation Electrification Pilots

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1938

**In the Matter of the Application of Portland) Notice of Supplement to Application for
General Electric Company for an Order) Reauthorization of the Deferral of Costs
Approving the Deferral of Costs and) and Revenues Associated with the
Revenues Associated with Transportation) Transportation Electrification Pilots
Electrification Pilots**

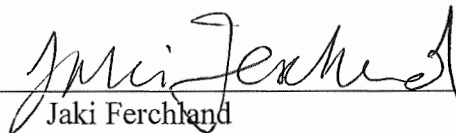
On February 21, 2020, Portland General Electric Company (“PGE”) filed a supplement to its application with the Public Utility Commission of Oregon (the “Commission”) for an Order authorizing deferral of costs and revenues associated with transportation electrification Pilots

Approval of PGE’s Application will not authorize a change in PGE’s rates, but will permit the Commission to consider allowing such deferred costs in rates in a subsequent proceeding.

Persons who wish to obtain a copy of PGE’s supplemental 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 March 20, 2020.

Dated this February 21, 2020



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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Supplemental Application for the Reauthorization of the Deferral of Costs and Revenues Associated with the Transportation Electrification Pilots** to be served by electronic mail to those parties whose email addresses appear on the attached service list to those parties on the attached service list for OPUC Dockets UM 1938.

Dated at Portland, Oregon, this 21 day of February, 2020.

A handwritten signature in cursive script, reading "Jaki Ferchland", written over a horizontal line.

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UM 1938

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