



Portland General Electric

121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

April 25, 2023

Via Electronic Filing

Public Utility Commission of Oregon
P. O. Box 1088
Salem, OR 97308-1088

**RE: UM 1938 Application to Reauthorize Deferred Accounting of Costs and Revenues
Associated with Transportation Electrification Pilots**

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with PGE's Transportation Electrification Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UE 394 and UM 1938 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/dm
Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1938

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Reauthorization of Deferred
Accounting of Costs Associated with the
Transportation Electrification Pilots.

**PORTLAND GENERAL ELECTRIC
COMPANY'S REQUEST FOR
DEFERRAL REAUTHORIZATION**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (PGE) hereby respectfully requests reauthorization to defer the costs and revenues associated with the Transportation Electrification Pilots (TE Pilots or Pilots) approved by the Public Utility Commission of Oregon (Commission or OPUC) in Order No. 18-054 and later modified by Order No. 19-385 (Docket No. UM 1811). These Pilots are aimed at advancing state policy to accelerate transportation electrification in Oregon. We request this reauthorization to be effective April 23, 2023, through April 22, 2024.

I. Deferral History

In alignment with the State of Oregon's policy direction of electrification, PGE is pursuing efforts as a company to decarbonize its energy supply, increase electricity as a share of total energy use, and enhance operational performance and efficiency. PGE's TE Pilots comply with Oregon's policy direction and support PGE's decarbonization, electrification, and performance imperatives.

In accordance with Commission Order Nos. 18-054 and 19-385 as well as OAR 860-087-0030, PGE has launched three TE Pilots: Electric Avenue (10 years), TriMet Mass Transit (10 years), and Education and Outreach (3 years), and will incur incremental costs, including costs

related to evaluations, for the Pilots. The details of the Pilots are discussed in PGE’s supplemental application for transportation electrification programs filed March 15, 2017 (Docket No. UM 1811) and are summarized as follows:

- Electric Avenue Pilot (including procurement, software, engineering studies, outreach, maintenance and payment process expenses);
- Support of Tri-Met Mass Transit (including procurement, management and maintenance expenses);
- Education and Outreach pilot expenses (including specialized trainings, builders and developer outreach, ride and drive events, and regional market transformation activities); and,
- Pilot Evaluation costs.

Due to the COVID-19 pandemic, many of the Education and Outreach events were cancelled as in-person activities were limited. Commission Order Nos. 18-054 and 19-385 both limit the Education and Outreach activities to three years ending in April 2021. In the April 23, 2021 application to reauthorize deferred accounting in this docket, PGE requested an extension of education & outreach activities due to the COVID-19 pandemic. The reauthorization application was approved in Order No. 21-475 without objection to the extension. As of the end of 2021, the education and outreach budget was mostly exhausted and only minor reporting fees were incurred in 2022, marking the conclusion of the Education and Outreach Pilot.

Completed activities for 2022 and the planned activities for 2023 for all three TE Pilots are described in Attachment A, “Implementation Detail for Transportation Electrification Pilots.”

To address these Pilots’ costs, PGE has filed and received authorization for deferred accounting as shown in Table 1, below.

**Table 1
UM 1938 Authorizations**

Filing Date	Deferral Period	Order No.
4/23/2018	4/23/2018 – 4/22/2019	20-381
4/23/2019	4/23/2019 – 4/22/2020	20-381
2/21/2020	Supplemental filing to clarify deferral	20-381
4/23/2020	4/23/2020 – 4/22/2021	20-381
4/23/2021	4/23/2021 – 4/22/2022	21-475
4/22/2022	4/23/2022 – 4/22/2023	Pending
4/21/2023	4/23/2023 – 4/22/2024	

II. OAR 860-027-0300 Requirements

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

a. Description of Amounts

PGE proposes that the deferral continue for the 10 years of the Pilots and is capped at a maximum allowable operations and maintenance (O&M) costs of \$3.8 million as approved by Commission Order No. 19-385 and listed in Table 2 below.

**Table 2
Maximum Allowable O&M Costs (\$000)**

Pilot	Amount
TriMet Electric Mass Transit Pilot (net)	\$0
Education and Outreach Pilot	\$480
Electric Avenue Pilot	\$2,787
Evaluations	\$580
Total	\$3,847

b. Reasons for Deferral

See Deferral History. The granting of this Application will minimize the frequency of rate changes and/or match appropriately the costs borne by and benefits received by customers. As PGE presented in the UM 1811 Transportation Electrification workshops, approval of a cost-

recovery mechanism is necessary to proceed with the Pilots because the costs are not included in customer prices or any other recovery mechanism.

c. Proposed Accounting for Recording Amounts Deferred.

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets) and credit the appropriate FERC expense accounts. When specific identification of the particular source of the regulatory asset cannot be reasonably made, then FERC account 407.4 (Regulatory Credits) will be credited. In the absence of a deferred accounting order, the costs would be debited to the appropriate cost accounts.

d. Estimate of Amounts to be Recorded for the Next 12 Months.

PGE estimates the net costs of the Pilots to be approximately \$0.4 million for the next 12 months and are included in the calendar year forecasts as presented in Table 3 below.

**Table 3
Pilot O&M Costs (Net of applicable revenues)**

	2018	2019	2020	2021	2022	2023	
Pilot:	Actual	Actual	Actual	Actual	Actual	Forecast	Total
Electric Avenue	\$2,966	\$(333)	\$538	\$44,351	\$141,093	\$347,380	\$535,996
Trimet	\$-	\$-	\$-	\$(64,205)	\$(42,646)	\$(46,911)	\$(153,762)
Education and Outreach	\$46,479	\$69,438	\$155,619	\$201,153	\$43,100	\$(35,600)	\$480,189
Evaluation	\$40,783	\$83,626	\$82,848	\$126,734	\$67,034	\$90,190	\$491,215
Total	\$90,229	\$152,731	\$239,005	\$308,033	\$208,581	\$355,059¹	\$1,353,639

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with the Notice of Application are attached to the application as

¹ Please note that approximately \$130 thousand of 2023 amounts relate to incurred expenses for Electric Avenue and TriMet Maintenance that were originally recorded to O&M expense and have since been reclassified to the UM 1938 deferral and thus included in amounts for 2023.

Attachment B. In compliance with the provisions of OAR 860-027-0300(6), PGE is serving the Notice of Application on the UM 1938 and UE 394 service lists.

III. Summary of Filing Conditions

a. Earnings Review

Cost recovery associated with the Pilots will be subject to an earnings review in accordance with ORS 757.259(5).

b. Prudence Review

PGE will submit Pilot evaluation reports that will provide detailed cost summaries. A prudence review can also be performed during the Pilots' operations.

c. Sharing

All prudently incurred costs and benefits would be collected or refunded from or to customers with no sharing mechanism.

d. Rate Spread/Rate Design

Costs will be allocated using the applicable rate schedule's forecasted energy based on an equal percent of revenues applied on a cents per kWh basis to each applicable rate schedule.

e. Three percent test (ORS 757.259(6))

The amortization of the Pilots' deferred costs will be subject to the three percent test in accordance with ORS 757.259(6) and (8), which limits aggregated deferral amortizations to no more than three percent of the utility's gross revenues for the preceding year.

IV. PGE Contacts

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

Kim Burton
Assistant General Counsel
Portland General Electric Company
121 SW Salmon Street
Portland, OR 97204
(573) 356-9688
kim.burton@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street
Portland, OR 97204
Phone: (503) 464-8172
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
Email: jacquelyn.ferchland@pgn.com

V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the costs and revenues associated with the Pilots, effective April 23, 2023.

DATED this 25th day of April 2023.

Respectfully Submitted,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon St, 1WTC0306
Portland, OR 97204
Telephone: (503) 464-7488
E-Mail: jacquelyn.ferchland@pgn.com

Attachment A

Implementation Detail for Transportation Electrification Pilots

Attachment B

Notice of Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with Transportation Electrification Pilots

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1938

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Reauthorization of Deferred
Accounting of Costs Associated with the
Transportation Electrification Pilots.

**PORTLAND GENERAL ELECTRIC
COMPANY'S NOTICE OF REQUEST
FOR DEFERRAL
REAUTHORIZATION**

On April 21, 2023, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission) for an Order reauthorizing deferral of costs and revenues associated with Transportation Electrification Pilots

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 Commission website.

Any person who wishes to submit written comments to the Commission on PGE's application must do so no later than May 16, 2023.

DATED this 21st day of April 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
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121 SW Salmon St, 1WTC0306
Portland, OR 97204
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with 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 lists for OPUC Dockets UM 1938 and UE 394.

Dated at Portland, Oregon, this 21st day of April 2023.

/s/ Jaki Ferchland

Jaki Ferchland
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