



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

December 7, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P. O. Box 1088
Salem, OR 97308-1088

Re: UM 2039 – In the Matter of Portland General Electric Company, Amended Application for Reauthorization to Defer Costs to Support Use of Balancing Account Associated with the Energy Efficiency Customer Service Reauthorization Application of Portland General Electric Company

Filing Center,

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Balancing Account Associated with the Energy Efficiency Customer Service pursuant to Commission Order No. 19-020.

A Notice regarding the filing of this application has been provided to the parties on the UE 416 and UM 2039 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
Senior Manager, Revenue Requirement

JF/dm

Enclosure
cc: Service List: UE 416 and UM 2039

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2039

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral Reauthorization to
Support the Use of a Balancing Account
Associated with the Energy Efficiency
Customer Service.

**PORTLAND GENERAL ELECTRIC
COMPANY APPLICATION FOR
DEFERRAL REAUTHORIZATION**

Pursuant to ORS 757.259, OAR 860-027-0300, and Public Utility Commission of Oregon (Commission or OPUC) Order Nos. 19-020 and 23-002, Portland General Electric Company (PGE) hereby requests reauthorization to defer certain costs and revenues associated with PGE's balancing account for Energy Efficiency (EE) Customer Service through the end of 2023.

I. Deferral Summary

This application (Application) is filed to support a balancing account that is used to record the activity of a Commission-approved mechanism, in conjunction with PGE Schedule 110. Beginning January 1, 2024, PGE will include the amounts associated with EE Customer Service into base rates consistent with Order No. 23-386. PGE requests this deferral reauthorization have an effective date of December 7, 2023, and continue through December 31, 2023. PGE anticipates seeking amortization of any remaining deferred costs or revenue balances in 2025. In short, approval of this Application will permit PGE to continue using the established EE Customer Service balancing account mechanism as approved by the

OPUC. In accordance with prior Commission Orders, amounts in the EE Customer Service balancing account will continue to be rolled forward and can have either positive or negative (i.e., debit or credit) balances. Section A below provides further details regarding PGE's balancing account.

II. OAR 860-027-0300 Requirements

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

a. Description of Utility Expense for Which Deferred Accounting is Requested

See Deferral Summary above. In prior regulatory filings, PGE proposed, and the Commission approved PGE to establish a balancing account for recording costs and revenues related to EE Customer Service. Specifically, PGE established a balancing account to record the differences between the actual fully loaded qualifying expenses¹ to fund PGE activities associated with enabling customers to achieve energy efficiency and the revenues collected under Schedule 110 adjusted to allow for uncollectibles, franchise fees, and other revenue-sensitive costs.

In compliance with Commission Order No. 19-020 and at the OPUC Staff's direction, PGE submits this Application to support the balancing account and to address variances – positive or negative – between expenses incurred and revenues collected that are rolled forward within the EE Customer Service balancing account.

b. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks to continue deferred accounting treatment for costs and revenues associated with EE Customer Service to

¹ The expenses include but are not limited to project facilitation, technical assistance, education and assistance to support programs administered by the Energy Trust of Oregon.

support the use of related balancing account. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by, and benefits received by customers. Approving this Application will not authorize a change in rates but will permit PGE to continue using the EE Customer Service balancing account as intended through the end of the calendar year and approved by prior Commission orders.

c. Proposed Accounting for Recording Amounts Deferred.

The EE Customer Service balancing account is recorded in either FERC 182.3 (Regulatory Assets), when qualified expenses incurred exceed revenue collected from customers, or FERC Account 254 (Regulatory Liabilities) when qualified expenses incurred are less than revenue collected from customers. PGE amortizes the balancing account based on the rate collected from customers through Schedule 110, adjusted by revenue-sensitive costs.

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

PGE does not have an estimate of the amounts to be deferred because they can vary depending on the level of costs and revenues. However, for the remaining period of December 2023, PGE estimates an amount of approximately \$110,000.

e. Notice

A copy of the Notice of Application for Deferral of Costs to Support PGE's EE Balancing Account and a list of persons served with Notice are attached to the Application as Attachment A. In compliance with OAR 860-027-0300(6), PGE is serving Notice of Application on the UE 416 and UM 2039 Service Lists.

III. The following is provided pursuant to OAR-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

PGE seeks approval to continue deferred accounting treatment for costs and revenues associated with the EE Customer Service balancing account. Without reauthorization, this deferral will expire on December 6, 2023.

IV. Summary of Filing Conditions

a. Earnings Review

No earnings review is applicable as PGE will not seek separate amortization of the deferred amounts in a future proceeding because all associated costs and revenues will continue to flow through the established balancing account. Additionally, as Schedule 110 is established as an Automatic Adjustment Clause, an earnings review is not required under ORS 757.259(5).

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of PGE's annual UM 2039 reauthorization filings.

c. Sharing Percentages

All prudently incurred costs are recoverable by PGE with no sharing mechanism.

d. Rate Spread/Rate Design

Rate Spread/Rate Design is applied in accordance with PGE Schedule 110. PGE will not seek amortization of the deferred amounts in a future proceeding because all associated costs and revenues will continue to flow through the established balancing account.

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

The three percent test does not apply because PGE will not seek amortization of the deferred amounts in a future proceeding.

V. **PGE Contacts**

Written communications regarding this Application should be addressed to:

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

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric
121 SW Salmon Street
Portland, OR 97204
(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:

Tom Kenny, Regulatory Analyst, Regulatory Affairs
thomas.kenny@pgn.com

b. Conclusion

For the reasons stated above, PGE requests permission to defer the costs and revenues related to the EE Customer Service balancing account including any amounts that roll forward into its balancing account calculations.

DATED this 7th day of December 2023.

Respectfully Submitted,

/s/ Jaki Ferchland

Jaki Ferchland

Senior Manager, Revenue Requirement

Portland General Electric Company

121 SW Salmon Street, 1WTC0306

Portland, OR 97204

Telephone: 503.464.7488

E-Mail: jacquelyn.ferchland@pgn.com

UM 2039

Attachment A

Notice of Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Energy Efficiency Customer Service Balancing Account

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2039

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral Reauthorization to
Support the Use of a Balancing Account
Associated with the Energy Efficiency
Customer Service.

**PORTLAND GENERAL ELECTRIC
COMPANY NOTICE OF
APPLICATION FOR DEFERRAL
REAUTHORIZATION**

On December 6, 2023, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (Commission or OPUC) for an Order reauthorizing deferral of costs and revenues to support PGE’s use of the established balancing account for the Energy Efficiency (EE) Customer Service.

Approval of PGE’s Application will not authorize a change in PGE’s rates but will permit PGE to continue using the EE Customer Service balancing account mentioned above as approved through prior Commission Orders.

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 January 2, 2024.

Dated this 7th day of December 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Senior Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: jacquelyn.ferchland@pgn.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the Notice of Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Energy Efficiency Customer Service Balancing Account to be served by electronic mail to those parties on the attached service list for OPUC Docket Nos. UE 416 and UM 2039.

Dated at Portland, Oregon, 7th day of December 2023.

/s/ Jaki Ferchland

Jaki Ferchland

Senior Manager, Revenue Requirement

Portland General Electric Company

121 SW Salmon Street, 1WTC0306

Portland, OR 97204

Telephone: 503.464.7488

E-Mail: jacquelyn.ferchland@pgn.com

SERVICE LIST
OPUC Docket No. UE 416

GUILERMO CASTILLO (C) (HC) SMALL BUSINESS UTILITY ADVOCATES	guillermo@utilityadvocates.org
STEVE CHRISS WALMART	stephen.chriss@wal-mart.com
TONIA L MORO (C) ATTORNEY AT LAW PC	106 TALENT AVE STE 6 TALENT OR 97540 tonia@toniamoro.com
BENEDIKT SPRINGER (C) COMMUNITY ACTION PARTNERSHIP OF OREGON	2475 CENTER ST NE SALEM OR 97301 benedikt@caporegon.org
AWEC	
BRENT COLEMAN (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY, SUITE 450 PORTLAND OR 97201 blc@dvclaw.com
JESSE O GORSUCH (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 jog@dvclaw.com
TYLER C PEPPLE (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com
CALPINE SOLUTIONS	
GREGORY M. ADAMS (C) RICHARDSON ADAMS PLLC	515 N 27TH ST BOISE ID 83702 greg@richardsonadams.com
GREG BASS CALPINE ENERGY SOLUTIONS, LLC	401 WEST A ST, STE 500 SAN DIEGO CA 92101 greg.bass@calpinesolutions.com
KEVIN HIGGINS (C) ENERGY STRATEGIES LLC	215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com

**COMMUNITY ENERGY
PROJECT**

KATE AYRES
COMMUNITY ENERGY
PROJECT

106 TALENT AVE STE 6
TALENT OR 97540
kate@communityenergyproject.org

CHARITY FAIN (C)
COMMUNITY ENERGY
PROJECT

2900 SE STARK ST STE A
PORTLAND OR 97214
charity@communityenergyproject.org

CUB

WILLIAM GEHRKE (C) (HC)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97206
will@oregoncub.org

MICHAEL GOETZ (C) (HC)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97205
mike@oregoncub.org

Share OREGON CITIZENS'
UTILITY BOARD
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

FRED MEYER

JUSTIN BIEBER (C)
FRED MEYER/ENERGY
STRATEGIES LLC

215 SOUTH STATE STREET, STE
200
SALT LAKE CITY UT 84111
jbieber@energystrat.com

KURT J BOEHM (C)
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

JODY KYLER COHN
BOEHM KURTZ & LOWRY

36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkylercohn@bkllawfirm.com

NEWSUN ENERGY

MARIE P BARLOW (C)
NEWSUN ENERGY LLC

550 NW FRANKLIN AVE STE 408
BEND OR 97703
mbarlow@newsunenergy.net

LESLIE SCHAUER (C)
NEWSUN ENERGY LLC

550 NW FRANKLIN AVE STE 408
BEND OR 97703
leslie@newsunenergy.net

JACOB (JAKE) STEPHENS (C)
NEWSUN ENERGY LLC

550 NW FRANKLIN AVE STE 408
BEND OR 97703
jstephens@newsunenergy.net

NRDC

RALPH CAVANAGH (C) (HC)
NATURAL RESOURCES
DEFENSE COUNCIL

111 SUTTER ST FL 20
SAN FRANCISCO CA 94104
rcavanagh@nrdc.org

CAROLINE CILEK (C) (HC)
GREEN ENERGY INSTITUTE

carolinecilek@lclark.edu

NW ENERGY COALITION

F. DIEGO RIVAS (C) (HC)
NW ENERGY COALITION

1101 8TH AVE
HELENA MT 59601
diego@nwenergy.org

PARSONS BEHLE & LATIMER

JUSTINA A CAVIGLIA
PARSONS BEHLE & LATIMER

50 WEST LIBERTY ST STE 750
RENO NV 89501
jcaviglia@parsonsbehle.com

PGE

PORTLAND GENERAL
ELECTRIC

pge.opuc.filings@pgn.com

KIM BURTON (C) (HC)
PORTLAND GENERAL
ELECTRIC

121 SW SALMON STREET
PORTLAND OR 97204
kim.burton@pgn.com

JAKI FERCHLAND (C) (HC)
PORTLAND GENERAL
ELECTRIC

121 SW SALMON ST. 1WTC0306
PORTLAND OR 97204
jacquelyn.ferchland@pgn.com

**SMALL BUSINESS UTILITY
ADVOCATES**

DIANE HENKELS (C) (HC)
SMALL BUSINESS UTILITY
ADVOCATES

621 SW MORRISON ST. STE 1025
PORTLAND OR 97205
diane@utilityadvocates.org

SBUA SBUA
SMALL BUSINESS UTILITY
ADVOCATES

9450 SW GEMINI DR. #11200
BEAVERTON OR 97008
britt@utilityadvocates.org

STAFF

STEPHANIE S
ANDRUS (C) (HC)
Oregon Department of Justice

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@doj.state.or.us

MATTHEW
MULDOON (C) (HC)
PUBLIC UTILITY COMMISSION
OF OREGON

PO BOX 1088
SALEM OR 97308-1088
matt.muldoon@puc.oregon.gov

NATASCHA SMITH (C) (HC)
Oregon Department of Justice

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301
natascha.b.smith@doj.state.or.us

WALMART

ALEX KRONAUER (C)
WALMART

alex.kronauer@walmart.com

SERVICE LIST
OPUC Docket No. UM 2039

STEPHANIE S ANDRUS Oregon Department of Justice	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@doj.state.or.us
KIM BURTON PORTLAND GENERAL ELECTRIC	121 SW SALMON STREET PORTLAND OR 97204 kim.burton@pgn.com
HEATHER COHEN PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 heather.b.cohen@puc.oregon.gov
MITCH MOORE PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 mitch.moore@puc.oregon.gov
Share PGE RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com
KATHY ZARATE PUBLIC UTILITY COMMISSION OF OREGON	201 HIGH ST SE STE 100 SALEM OR 97301 kathy.zarate@puc.oregon.gov