



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

December 4, 2020

Via Electronic Filing

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

Re: UM 2039 PGE's Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Balancing Account Associated with the Energy Efficiency Customer Service

Dear 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 335 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
Manager, Revenue Requirement

JF/np

Enclosure
cc: Service List: UE 335 and UM 2039

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2039

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral Reauthorization of
Costs 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 and OAR 860-027-0300, and Commission Order 19-020, Portland General Electric Company (PGE) hereby requests reauthorization to defer certain costs and revenues associated with PGE's balancing account for the Energy Efficiency (EE) Customer Service.

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. PGE requests this deferral have an effective date of December 7, 2020 and be subject to annual renewals as long as the (EE) Customer Service balancing account is in place. PGE will not seek amortization of the deferred amounts in a future proceeding as the deferred amounts will automatically reverse due to the standard operation of the approved (EE) Customer Service mechanism. 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.

In addition, PGE filed a request for reauthorization of deferred accounting treatment for this balancing account in December 2019. PGE, however, is currently awaiting a Commission decision on that application. Thus, PGE has an unresolved deferral application related to the EE Customer Service balancing account in addition to this reauthorization request.

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 for allowance 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 the occasions when there is any variance - positive or negative – between expenses incurred and revenues collected that is rolled forward within the EE Customer Service balancing account.

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.

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 associated with EE Customer Service to 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 the Application will not authorize a change in rates but will permit PGE to continue using the EE Customer Service balancing account as intended and approved through 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 occur infrequently and can vary depending on the level of expenses and revenues or the accuracy of projections.

e. Notice

A copy of the Notice of Application for Deferral of Costs to Support PGE's Energy Efficiency 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 335 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, 2020.

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 accounts.

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of PGE's general rate case filings.

c. Sharing Percentages

All prudently incurred costs are to be 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 would 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:

Douglas C. Tingey
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In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Stefan Cristea, Senior Regulatory Analyst, Regulatory Affairs
E-mail: Stefan.cristea@pgn.com

a. 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 4th day of December, 2020.

Respectfully Submitted,

/s/ Jaki Ferchland

Jaki Ferchland
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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 of
Costs 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 4, 2020, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the 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 4, 2021.

Dated this 4th day of December, 2020.

/s/ Jaki Ferchland

Jaki Ferchland
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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 335 and UM 2039.

Dated at Portland, Oregon, 4th day of December, 2020.

/s/ Jaki Ferchland

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