



Oregon Citizens' Utility Board

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October 4, 2021

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

Re: UM 2119 – CUB and AWEC Application for Reauthorization

In accordance with ORS 757.259 and OAR 860-027-0300, the Alliance of Western Energy Consumers (“AWEC”) and the Oregon Citizens' Utility Board (“CUB”) hereby submit for electronic filing an Application for Reauthorization of its Application for an accounting Order Requiring Portland General Electric Company to Defer Expenses and Capital Costs Associated with the Boardman Power Plant, initially filed on October 8, 2020.

As required by OAR 860-027-0300(3)(e), a copy of the Notice of Application and list of persons served with the Notice has been attached to this filing as Attachment A.

Approval of AWEC and CUB’s application 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. The application is on the OPUC website. Persons who wish to obtain a copy of AWEC and CUB’s application will be able to access it on the OPUC website.

A handwritten signature in blue ink, appearing to read "T. Jerin", is positioned above the typed name of Thomas Jerin.

Thomas Jerin
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2119**

IN THE MATTER OF)	
)	
ALLIANCE OF WESTERN ENERGY)	
CONSUMERS AND OREGON CITIZENS’)	CUB AND AWEC’S JOINT
UTILITY BOARD,)	APPLICATION FOR
)	REAUTHORIZATION
Application for an Accounting Order)	
Requiring Portland General Electric Company)	
to Defer Expenses and Capital Costs associated)	
with the Boardman Power Plant.)	

I. INTRODUCTION

Pursuant to ORS 757.259 and OAR 860-027-0300(4), the Alliance of Western Energy Consumers (“AWEC”) and Oregon Citizens’ Utility Board (“CUB”) hereby request reauthorization for later rate-making treatment of AWEC and CUB’s Application for an Accounting Order Requiring Portland General Electric Company to Defer Expenses and Capital Costs associated with the Boardman Power Plant (the “Deferred Amount”). AWEC and CUB respectfully request that this reauthorization become effective October 8th, 2021. AWEC and CUB will seek amortization of the Deferred Amount in a future Commission proceeding.

In support of this Application for Reauthorization, AWEC and CUB state:

1. AWEC is an incorporated, non-profit association of large energy consumers in the Western United States, with offices in Portland, Oregon. Many members of AWEC are customers of Portland General Electric Company (“PGE” or “the

Company”). AWEC represents the interests of a number of large customers served by PGE.

2. CUB is an incorporated, non-profit association, representing residential customers. Legislation creating the CUB was enacted into law in 1985, ORS 774.020. CUB was created to ensure that utility consumers have an effective advocate to reflect their needs and interests when it comes to public policies affecting the quality and price of utility.
3. This Application for Reauthorization is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items for later incorporation in rates and OAR 860-027-0300(4), which sets forth the requirements for an application for reauthorization.
4. Communications regarding this Application should be addressed to:

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II. OAR 860-027-0300(3) Requirements

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

A. Background Description

PGE owns 90 percent of the Boardman 575 MW coal-fired generating plant,

resulting in a 518 MW net base capacity for the Company. The Commission acknowledged the shutdown of Boardman by no later than the end of 2020 through Order No. 10-457.¹ In accordance with Order No. 10-457, PGE ceased operations at Boardman in October 2020. On February 15, 2018, PGE filed a general rate case for rates effective January 1, 2019.² PGE's investment in Boardman is currently included in the Company's base rates established in the 2018 general rate case and will continue at the same level until the rate-effective date of PGE's next general rate case in the absence of a deferral.³ Therefore, customers of PGE are continuing to incur costs of Boardman. AWEC and CUB will track these costs and will defer them for future ratemaking treatment.

B. Reasons for Deferral

AWEC and CUB seek this deferral to match the costs borne by and benefits received by customers. Under ORS 757.259(2)(e) and Commission Oregon No. 20-147, deferral of utility expenses, revenues, and capital-related costs are allowed when it will appropriately match the costs borne and benefits received by customers.

C. Proposed Accounting

AWEC and CUB recommend that PGE record the deferred amounts as a regulatory liability to the appropriate FERC account.

D. Estimate of Accounts

¹ Docket No. LC 48, Order No. 10-457 (Nov. 23, 2010).

² Docket No. UE 335, Request for a General Rate Revision (Feb. 15, 2018).

³ PGE filed its 2021 general rate case on July 9, 2021 with a rate effective date of May 2022. See Docket No. UE 394/PGE/100 Pope – Sims/5:20.

As of October 2021, AWEC and CUB expect that the deferral will have incurred approximately \$90 million at the time of amortization. Final total costs will not be known until these costs are amortized.

E. Notice

A copy of the Notice of Application for Deferral of Costs and Expenses associated with Boardman and a list of persons served with the Notice are attached to this Application for Reauthorization as Attachment A.

III. CONCLUSION

For the foregoing reasons, AWEC and CUB respectfully request that the Commission reauthorize this deferred accounting Application.

Dated this 4th day of October 2021.



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/s/ Tyler C. Pepple
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Attachment A

Notice of Application for Reauthorization of Accounting Order Requiring Portland General Electric Company to Defer Investment in the Boardman Plant Included in Rate Base

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2119

In the Matter of)	
)	
ALLIANCE OF WESTERN ENERGY)	NOTICE OF JOINT APPLICATION
CONSUMERS and OREGON CITIZENS’)	FOR REAUTHORIZATION OF
UTILITY BOARD)	DEFERRED ACCOUNTING OF THE
)	ALLIANCE OF WESTERN ENERGY
Application for an Accounting Order Requiring)	CONSUMERS AND OREGON
Portland General Electric Company to Defer)	CITIZENS’ UTILITY BOARD
Expenses and Capital Costs associated with the)	
Boardman Power Plant.)	
_____)	

Pursuant to OAR 860-027-0300(6), on October 4th, 2021, the Alliance of Western Energy Consumers (“AWEC”) and the Oregon Citizens’ Utility Board (“CUB”) jointly applied to the Oregon Public Utilities (“Commission”) for an order requiring Portland General Electric Company (“PGE” or “Company”) to defer PGE’s investment and expenses associated with the Boardman Plant (“Boardman”) currently included in the Company’s base rates established in its 2019 general rate case, beginning on the date that Boardman ceases operations.

This Application is on the Commission’s website. Persons who wish to obtain a copy of AWEC and CUB’s application will be able to access it on the Commission’s website, and “any person may submit to the Commission written comment on [this Application] by the date set forth in the notice, which date may be no sooner than 25 days from the date of [this Application].”¹

¹ OAR 860-027-0300(6)(d).

The granting of AWEC and CUB’s Application “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.”²

Dated this 4th day of October, 2021



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² OAR 860-027-0300(6)(e)

UM 2119– CERTIFICATE OF SERVICE

I hereby certify that, on this 4th day of October, 2021, I served the **CUB and AWEC's Joint Application for Reauthorization of Deferred Accounting** in docket UM 2119 upon the Commission and each party on the service lists of dockets UM 2119 and UE 394 via electronic mail.

AWEC

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