



September 15, 2023

*Via Electronic Filing to [PUC.FilingCenter@puc.oregon.gov](mailto:PUC.FilingCenter@puc.oregon.gov)*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem, OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,  
Request for a General Rate Revision.  
**Docket No. UE 416**

Dear Filing Center:

Please find enclosed the **Issue List: Revenue Decoupling** on behalf of the Natural Resources Defense Council (NRDC) and the NW Energy Coalition (NVEC) in the above-referenced docket.

It has been served on all parties of record.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

*/s/ Caroline A. Cilek*

Enclosure

**NATURAL RESOURCES DEFENSE COUNCIL**

111 SUTTER STREET | SAN FRANCISCO, CA | 94104 | T 415.875.6100 | F 415.875.6161 | NRDC.ORG

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UE 416**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Request for a General Rate Revision; and  
2024 Annual Power Cost Update.

**ISSUES LIST: REVENUE DECOUPLING**

Pursuant to the Prehearing Conference Memorandum filed March 13, 2023,<sup>1</sup> the Natural Resources Defense Council and NW Energy Coalition submit the following issue to be determined by the Commission.

Issue: Does the Commission support reinstatement of a revenue decoupling mechanism for PGE?

NRDC and NWECA propose reinstatement of the revenue decoupling mechanism that was suspended last year in UE 394, with an adjustment (a “soft cap” on annual true-ups in electricity rates) that would restore a key feature of the mechanism that the Commission originally approved in 2009.

*NRDC/NWECA Testimony:*

1. *NRDC/NWECA Exhibit 100, pp. 1-24*
2. *NRDC/NWECA Exhibit 200, pp. 1-11*

*PGE Testimony:*

1. *PGE Exhibit 1300, pp. 35-40*
2. *PGE Exhibit 2600, pp. 12-18*

*OPUC Staff Testimony:*

1. *OPUC Staff Exhibit 2000, pp. 58-63*
2. *OPUC Staff Exhibit 3300, pp. 29-38*

*CUB Testimony:*

1. *CUB Exhibit 400, pp. 32-35*

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<sup>1</sup> UE 416, In the Matter of Portland General Electric Company, Request for a General Rate Revision; and 2024 Annual Power Cost Update, Prehearing Conference Memorandum (March 13, 2023), <https://edocs.puc.state.or.us/efdocs/HDC/ue416hdc165417.pdf>.

Respectfully submitted,

/s/ Caroline A. Cilek

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**CERTIFICATE OF SERVICE**

**UE 416**

I certify that I have, this day, served the foregoing document upon all parties of record in this proceeding by delivering a copy by electronic mail pursuant to OAR 860-001-0180, to the following parties or attorneys of parties.

Dated this 15<sup>th</sup> day of September, 2023, at San Francisco, CA



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