



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204  
portlandgeneral.com

October 31, 2023

***Via Electronic Filing***

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

Re: UM XXXX PGE's Application for Deferred Accounting Treatment of Certain Expenses  
Associated with Clearwater Wind Project (Clearwater)

Enclosed for filing is Portland General Electric Company's (PGE) Application for Deferred  
Accounting Treatment of Certain Expenses Associated with Clearwater.

A Notice regarding filing this application has been provided to the parties on the PGE's current  
general rate case service list (UE 416).

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

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM XXX**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Application for Deferral of Costs Related to  
Clearwater Wind Project

**PORTLAND GENERAL ELECTRIC  
COMPANY’S APPLICATION FOR  
DEFERRAL OF COSTS ASSOCIATED  
WITH CLEARWATER WIND  
PROJECT**

Pursuant to OAR 860-027-0300, ORS 757.259, ORS 469A.120, Commission Order No. 07-572, and Portland General Electric Company (PGE) Schedule 122, PGE hereby requests authorization to defer for later ratemaking treatment certain costs (the “Deferred Amount”), as described below, associated with the Clearwater Wind Project (Clearwater). In support of this Application, PGE states:

1. PGE is a public utility in the state of Oregon and its rates, services, and accounting practices are subject to the regulation of the Public Utility Commission of Oregon (Commission).
2. This application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items for later incorporation in rates.
3. Communications regarding this Application should be addressed to:

PGE-OPUC Filings  
Rates & Regulatory Affairs  
Portland General Electric Company  
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Portland, OR 97204  
Phone: 503.464.7805  
E-mail: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Kim Burton  
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Portland General Electric Company  
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Portland, OR 97204  
Phone: 573.356.9688  
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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:

Greg Batzler, Senior Regulatory Consultant  
E-mail: greg.batzler@pgn.com

**I. OAR 860-027-0300 Requirements:**

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

**A. Background**

On October 30, 2023, PGE submitted direct testimony in Docket UE 427, PGE's Renewable Resources Automatic Adjustment Clause (RAAC) Schedule 122 filing, seeking recovery for all costs and benefits associated with Clearwater. Although Clearwater is expected to come online on or around December 31, 2023, we have requested a tariff effective date of June 1, 2024, to accommodate a contested case proceeding. Thus, in accordance with PGE's Schedule 122 provisions and ORS 469A.120, which allows the recovery of all prudently incurred costs for complying with Oregon's Renewable Portfolio Standards, PGE requests deferred accounting to track all Clearwater-related costs incurred prior to the tariff effective date for UE 427.

**B. Reason for Deferral**

In this request for deferral of costs, PGE is seeking authorization to record, in a deferred account, certain costs, as described below, associated with Clearwater incurred prior to the tariff effective date for PGE's request in UE 427. Commission Order No. 07-572 allows for the recovery of prudently incurred costs for eligible renewable resources (i.e., Clearwater), that PGE may request a deferral of costs prior to inclusion in rates, and that the deferral is exempt from an earnings test.

Consistent with PGE's Schedule 122, these costs include the fixed and variable costs of

Clearwater such as the return on and of associated capital costs, operations and maintenance (O&M) costs, net variable power costs, associated transmission costs, income taxes, property taxes, and other fees and costs that are applicable to Clearwater.

The granting of this deferral application will appropriately match the costs borne by and benefits received by customers.

**C. Proposed Accounting**

PGE proposes to record all deferred costs in FERC Account 182.3, Other Regulatory Assets, with a credit to FERC account 456, Other Revenue. In the absence of a deferred accounting order from the Commission, PGE would record costs to several different FERC accounts, including FERC account 548, generation expense, FERC Account 553, maintenance of generating and electric equipment, FERC account 408.1 property tax, FERC account 403, depreciation expense, etc.

**D. Estimates of Amounts**

PGE currently estimates the amount subject to the deferral during the 12-month period after the filing of this application would be a credit amount of approximately \$4.0 million. However, the exact amount will depend on several factors, including the actual in-service date of Clearwater and effective date of Schedule 122.

**E. Notice**

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

**II. Summary of Filing Conditions:**

**A. Earnings Review:**

Not applicable. See Commission Order No. 07-572, in which parties agreed that deferrals associated with the RAAC should not be subject to the ORS 757.259(5) earnings review.

**B. Prudence Review:**

Should be performed by the OPUC Staff after PGE files to amortize the Deferred Amount.

**C. Sharing Percent:**

No sharing mechanism applies to deferrals associated with the RAAC.

**D. Rate Spread/Rate Design:**

Costs recovered through this deferral will be allocated to each schedule based on the forecasted energy of the respective schedule, utilizing an equal percentage of generation revenue applied on a cents per kWh basis, in accordance with PGE Schedule 122.

**E. Three Percent Test:**

The three percent does not apply to amortization of this deferral.

### III. Conclusion:

For the reasons stated above, PGE requests authorization to defer from the date of this application certain costs associated with Clearwater as described herein, until such time as the tariff effective date associated with PGE's request in UE 427.

DATED this 31<sup>st</sup> day of October 2023.

Respectfully Submitted,

*/s/ Jaki Ferchland*

Jaki Ferchland,  
Senior Manager, Revenue Requirement,  
Regulatory Affairs  
On Behalf of Portland General Electric Company  
Telephone: 503-464-7488  
E-Mail: [jacquelyn.ferchland@pgn.com](mailto:jacquelyn.ferchland@pgn.com)

UM XXXX

Attachment A

Notice of Application for Deferred Accounting Treatment of Certain  
Costs Associated with Clearwater

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM XXXX**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Application for Deferral of Costs Related to  
Clearwater Wind Project

**PORTLAND GENERAL ELECTRIC  
COMPANY'S NOTICE OF  
APPLICATION FOR DEFERRAL OF  
COSTS RELATED TO CLEARWATER  
WIND PROJECT**

On October 31, 2023, Portland General Electric Company (PGE) filed an Application with the Public Utility Commission of Oregon (Commission or OPUC) for an Order authorizing deferral of its Clearwater Wind Project-related costs.

Approval of PGE'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.

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 November 31, 2023.

Dated: October 31, 2023

*/s/ Jaki Ferchland*  
Jaki Ferchland,  
Senior Manager, Revenue Requirement,  
Regulatory Affairs  
On Behalf of Portland General Electric Company  
Telephone: 503-464-7488  
E-Mail: [jacquelyn.ferchland@pgn.com](mailto:jacquelyn.ferchland@pgn.com)



## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Authorization to Defer Clearwater Wind Project-related Costs** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service list for OPUC Docket No. UE 416.

Dated at Portland, Oregon, this 31<sup>st</sup> day of October 2023.

*/s/ Jaki Ferchland*

Jaki Ferchland,  
Senior Manager, Revenue Requirement,  
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On Behalf of Portland General Electric Company  
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