



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

March 20, 2020

Via Electronic Filing

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

Re: UM _____ PGE's Application for Authorization to Defer Costs Associated with the COVID-19 Emergency

Enclosed for filing is Portland General Electric Company's ("PGE") Application for Authorization to Defer Costs Associated with the COVID-19 Emergency.

A Notice regarding the filing of this application has been provided to the parties on the PGE's last general rate case service list (UE 335).

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@pge.com.

Sincerely,

/s/ Jaki Ferchland
Jaki Ferchland
Manager, Revenue Requirement

JF/np

Enclosure
cc: Service List: UE 335

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of the Application of Portland) **Application for the Deferral of Costs**
General Electric Company for an Order) **Associated with the COVID-19 Emergency**
Approving the Deferral of Costs Associated)
with the COVID-19 Emergency)

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company ("PGE") hereby requests an accounting order authorizing PGE to defer for later ratemaking treatment recovery costs from the COVID-19 impacts in PGE's service territory (the "Deferred Amount"). PGE seeks authorization to defer the recovery of costs incurred from the date of this application until at least through year-end 2020 (the "Deferral Period"). PGE will seek amortization of the Deferred Amount in a future Commission proceeding. In support of this Application PGE states:

1. PGE is a public utility in the state of Oregon and its rates, service and accounting practices are subject to the regulation of the Public Utility Commission of Oregon ("Commission" or "OPUC").
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:

Jay Tinker
Rates & Regulatory Affairs
Portland General Electric
121 SW Salmon Street,
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Portland, Oregon 97204
Phone: (503) 464-7002
E-mail: pge.opuc.filings@pgn.com

Douglas C. Tingey
Associate General Counsel
Portland General Electric
121 SW Salmon Street,
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Portland, Oregon 97204
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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:

Jaki Ferchland,
Manager, Revenue Requirement
E-mail: Jacquelyn.Ferchland@pgn.com

Alex Tooman
Sr. Regulatory Consultant
E-mail: Alex.Tooman@pgn.com

4. As required by ORS 757.259(4), any amortization of the Deferred Amount will be subject to an earnings review and a finding by the Commission that the costs were prudently incurred. PGE does not expect that amortization of the Deferred Amount will cause PGE to meet or exceed its most recently authorized return on equity.

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

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

A. Background Description

With the rapidly expanding incidence of COVID-19¹ and its attendant impacts, PGE expects that it will incur significant costs to address those impacts. In particular, PGE plans to suspend all service disconnections and the imposition of late payment fees² in order to help limit the impact of the emergency on PGE's customers, many of them being especially vulnerable to unexpected economic pressures. These suspensions will result in significant increases in PGE's write-off expense and lost revenue from late payment fees. We also expect to incur additional costs and lost revenue as the emergency unfolds but cannot currently predict the nature or magnitude of these costs given the unprecedented nature of the emergency. Consequently, PGE proposes to establish a new deferral account to record the costs and lost revenue directly associated with COVID-19. PGE will track the costs accordingly and will defer them for future ratemaking treatment.

¹ On March 8, 2020, Oregon Governor Brown declared a state of emergency over the COVID-19 outbreak.
PGE Application for Deferral

B. Reasons for Deferral

PGE seeks this deferral pursuant to ORS 757.259(2)(e). This deferral will match appropriately the costs borne and benefits received by customers. PGE also seeks this deferral because of the potential magnitude and extraordinary nature of the COVID-19 impacts. Because the COVID-19 emergency is so unprecedented, PGE believes that the impacts are outside of reasonable business risk.

Under ORS 757.259(2)(e), deferral of utility expenses or revenues is allowed when it will appropriately match the costs borne and benefits received by customers. Deferral of these restoration costs will align the costs of PGE's service with the benefits PGE customers receive from such service.

C. Proposed Accounting

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets), crediting FERC Account 407.4 (Regulatory Credits). In the absence of a deferred accounting order, PGE would apply the costs to a variety of accounts.

D. Estimate of Amounts

Given the unprecedented nature of the emergency, PGE cannot estimate the costs associated with COVID-19 or the length of time in which the costs will be incurred.

E. Notice

A copy of the Notice of Application for Deferral of Costs Associated with the COVID-19 Emergency and a list of persons served with the Notice are attached to the application as Attachment A.

² On March 13, PGE filed for a waiver of OAR 860-021-0126.
PGE Application for Deferral

II. Summary of Filing Conditions:

A. Earnings Review:

Cost recovery for costs associated with the COVID-19 emergency will be subject to an earnings review in accordance with ORS 757.259(5).

B. Prudence Review:

A prudence review will be performed by the OPUC Staff no later than the proceeding to authorize amortization of the costs associated with COVID-19.

C. Sharing Percentages:

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

D. Rate Spread / Rate Design:

The rate spread/rate design will be determined during the proceeding to authorize amortization of the costs associated with COVID-19.

E. Three or Six Percent Tests (ORS 757.259(6)(7)(8)):

Amortization of the deferred costs will be subject to a three percent test in accordance with ORS 757.259(7) or possible six percent test in accordance with ORS 757.259(8) and with Commission authorization. These tests limit aggregated deferral amortizations during a 12-month period to no more than three or six percent of the utility's gross revenues for the preceding year.

III. Conclusion

For the reasons stated above, PGE requests permission to defer costs associated with COVID-19 for the Deferral Period.

DATED this March 20, 2020

Respectfully Submitted,

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company

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Attachment A

Notice of Application for Deferral of Costs Associated with the COVID-19 Emergency

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs Associated with the COVID-19 Emergency) Notice of Application for the Deferral of Costs Associated with the COVID-19 Emergency)))
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On March 18, 2020, Portland General Electric Company (“PGE”) filed an application with the Public Utility Commission of Oregon (the “Commission” or “OPUC”) for an Order authorizing deferral of costs associated with the COVID-19 emergency.

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.

This application is on the OPUC website. 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 April 20, 2020.

Dated this March 20, 2020

/s/ Jaki Ferchland
Jaki Ferchland
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Deferral Costs Associated with the COVID-19 Emergency** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UE 335.

Dated at Portland, Oregon, March 20, 2020

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

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