

January 08, 2024

## Via Electronic Filing

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

RE: UM XXXX - PGE's Application for Authorization to Defer Revenues Associated with Sales Normalization Adjustment

Filing Center;

Pursuant to ORS 757.259, OAR 860-027-0030, and Commission Order No. 23-386, Portland General Electric Company (PGE) hereby requests authorization to defer for later rate-making treatment revenues associated with a Sales Normalization Adjustment ("SNA").

A Notice regarding the filing has been provided electronically to the parties on the UE 416 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 or email Greg Batzler at greg.batzler@pgn.com. Please direct all formal correspondence, questions, or requests to pge.opuc.filings@pgn.com.

Sincerely,

/s/Jaki Ferchland

Jaki Ferchland Senior Manager, Revenue Requirement

JF/dm Enclosures

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### UM XXXX

In the Matter of
PORTLAND GENERAL ELECTRIC
COMPANY

Application for Authorization to Defer Revenues Associated with Sales Normalization Adjustment PORTLAND GENERAL ELECTRIC COMPANY APPLICATION OF DEFERRED ACCOUNTING

Pursuant to ORS 757.259, OAR 860-027-0300, and Public Utility Commission of Oregon ("Commission" or "OPUC") Order No. 23-386, Portland General Electric Company ("PGE") hereby requests authorization to defer for later rate-making treatment revenues associated with a Sales Normalization Adjustment ("SNA"). 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
1WTC0306
121 SW Salmon Street
Portland, OR, 97204

Portland, OR 97204 Phone: 503.464.7805

E-mail: pge.opuc.filings@pgn.com

Kim Burton Assistant General Counsel III Portland General Electric Company 1WTC1301 121 SW Salmon Street Portland, OR 97204 Phone: 573.356.9688

E-mail: kim.burton@pgn.com

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

In Docket No. UE 416, PGE discussed the possibility of returning to a decoupling

mechanism for residential and small non-residential customers that would include a symmetrical

3% soft cap. However, PGE argued it would first be important obtain reform of its Power Cost

Adjustment Mechanism in order to avoid refunding revenues during demand periods where

increased revenues would be needed to offset higher power costs.

To resolve this issue, parties to UE 416 stipulated to an agreement that PGE would file a

tariff for decoupling no later than 90 days following a Commission order adopting the stipulation.

Commission Order No. 23-386 adopted the Sixth Partial Stipulation containing this agreement,

which specified:

1. The tariff for residential and small non-residential customers will include a soft cap of

3%, in which amounts beyond 3% will carry forward to the subsequent year (or years)

for refund or recovery;

2. The decoupling tariff will include a sunset after December 31, 2025; and

3. Parties are free to support or oppose the tariff when it is filed.

B. Reason for Deferral

Pursuant to ORS 757.259(2)(e) and Commission Order No. 23-386, discussed above, PGE

seeks deferred accounting treatment of revenues associated with a decoupling mechanism. The

Application for Deferred Accounting

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granting of this Application will minimize the frequency of rate changes or fluctuations pursuant to ORS 757.259(e) and match appropriately the costs borne by and benefits received by customers.

## C. Proposed Accounting

PGE proposes to record the deferred amounts to FERC account 182.3 (Regulatory Assets) if the deferred amount is to be collected from customers or FERC account 229 (Accumulated Provision for Rate Refunds) if the deferred amount is to be refunded to customers. The corresponding credit or debit is to FERC account 456 (Other Revenue) or FERC account 449.1 (Provision for Rate Refunds), respectively. In the absence of a deferred accounting order from the Commission, PGE would record the revenues associated with the deferred account in FERC accounts 440 (Residential Sales).

#### D. Estimate of Amounts

The 2024 deferral amounts are not yet available but will be calculated in the first quarter of 2025. The determination of amounts will reflect the difference between actual, weather adjusted usage per customer during the deferral period and the usage per customer projected in UE 416.

#### E. Notice

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

## **II.** Summary of Filing Conditions:

## A. Earnings Review:

PGE does not believe an earnings review is required.

#### **B.** Prudence Review:

A prudence review should include a verification of the accounting methodology used to determine the final amortization balance.

## C. Sharing:

The SNA amortizations will be collected from or refunded to customers with no sharing mechanism.

## D. Rate Spread/Rate Design:

The rate spread for SNA amortizations will be defined within a forthcoming Schedule 123 tariff filing.

#### E. Three Percent Test:

Commission has adopted separate rate impact conditions as described above, thus the threepercent test is not applicable.

## III. Conclusion

For the reasons stated above, PGE requests authorization to defer from the date of this application revenues associated with a decoupling mechanism.

DATED this 8<sup>th</sup> day of January 2024.

# /s/Jaki Ferchland

Jaki Ferchland Senior Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street Portland OR 97204 (503) 464-7488 jacquelyn.ferchland@pgn.com

# **Attachment A**

Notice of Application for Authorization to Defer Revenues Associated with Sales Normalization Adjustment

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### UM XXXX

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY

Application for Authorization to Defer Revenues Associated with Sales Normalization Adjustment PORTLAND GENERAL ELECTRIC COMPANY NOTICE OF APPLICATION FOR AUTHORIZATION OF DEFERRED ACCOUNTING

On January 8, 2024, Portland General Electric Company (PGE) filed an Application for Authorization to Defer Revenues Associated with Sales Normalization Adjustment with the Public Utility Commission of Oregon (Commission or OPUC).

Approval for deferred accounting treatment 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 February 2, 2024.

DATED this 8th day of January 2024.

/s/ Jaki Ferchland

Jaki Ferchland Senior Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street Portland OR 97204 (503) 464-7488 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 Revenues Associated with Sales Normalization Adjustment** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UE 416.

DATED at Portland, Oregon, this 8th day of January, 2024.

/s/Jaki Ferchland

Jaki Ferchland Senior Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street Portland OR 97204 (503) 464-7488 jacquelyn.ferchland@pgn.com

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