



# Oregon Citizens' Utility Board

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3/3/2023

Public Utility Commission  
Attn: Filing Center  
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**RE: Portland General Electric (Docket No. Adv 1453/Advice No. 22-36)  
Establishes PGE Schedule 153, Community Benefits and Impact Advisory Group Cost  
Recovery Mechanism**

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to comment on Portland General Electric Company's (PGE) proposed Schedule 153, Community Benefits and Impact Advisory Group Cost Recovery Mechanism. This proposed mechanism is being brought before the Public Utility Commission of Oregon (Commission) as agenda item CA1 at the forthcoming March 7, 2023 regular public meeting. In this filing, PGE seeks to create a community benefits and impact advisory group cost recovery mechanism. Portland General Electric's proposed mechanism is an automatic adjustment clause for costs associated with the community benefits and impacts advisory group.

At this time, CUB recommends that the Commission delay ruling on this agenda item. Since the Commission is considering the contours of automatic adjustment clauses in two concurrent contested case proceedings, judicial and administrative efficiency will be served by delaying consideration of this agenda item until those proceedings are concluded.<sup>1</sup>At a minimum, CUB requests that the Commission remove this item from the consent agenda to the regular agenda to enable a substantive conversation on the merits of PGE's proposal. To be clear, CUB does not inherently oppose the creation of a mechanism to recover these costs.

**Good cause exists to delay ruling on this agenda item.**

CUB is generally concerned with the frequency, volume, and number of single-issue ratemaking mechanisms that investor-owned utilities have presented before the Commission. In 2008, PGE filed for a single deferral proceeding. In 2022, this number had grown to 25 PGE filings. This presents several issues for the Commission and customers. CUB has found it challenging to manage the volume of rate increases being requested through single issue rate mechanism, such as automatic adjustment clauses and deferrals. CUB is concerned that the increasing volume and serial nature of single-issue ratemaking from the six investor-owned utilities is shifting risk and cost to customers while simultaneously making the Commission's mandate to establish just and reasonable rates more difficult to achieve.

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<sup>1</sup> CUB is referring to Commission proceedings UE 407 and UE 412.



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For the purposes of administrative efficiency, CUB recommends the Commission not rule on this mechanism at this time. CUB is potentially interested in considering changes to this mechanism, including the application of an earnings test. Holding the proceedings in this docket in abeyance for a few months will result in a more efficient use of the time and resources of parties, the Commission, and PGE. It will avoid the duplicative effort since CUB is currently litigating the application of an earning test to wildfire recovery mechanisms for PGE and Pacific Power. The outcome of that case will influence CUB's position in this proceeding. Further, shareholders will not be harmed by a delay since the amounts potentially collectible in this proceeding will continue accruing interest at the pre-amortization rate until a final Commission order is issued.

Respectfully submitted,

*/s/Will Gehrke*

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