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COMMENTS ON PGE APPLICATION FOR DEFERRAL OF REVENUES ASSOCIATED
WITH THE CHANGE IN FEDERAL ENERGY REGULATORY COMMISSION OPEN
ACCESS TRANSMISSION TARIFF IN DOCKET No. UM 2217

My name is Steve Knudsen and I reside at 2015 SE Salmon St, Portland, OR 97214. I have been a continuous residential customer of PGE for 42 years. Please accept these comments and post them in Docket No. UM 2217.

Background

On December 27, 2021, Portland General Electric Company Applied for the Deferral of Revenues Associated with the Change in Federal Energy Regulatory Commission Open Access Transmission Tariff (Docket No. UM). The OPUC assigned PGE's Application to:

Docket No. UM 2217 Docket Name: PGE DEFFERAL OF REVENUES ASSOCIATED WITH FERC OATT

PGE states that the PGE's Application was filed Pursuant to ORS 757.259 and OAR 890-027-0030. ORS 757.259 provides that "Upon application of a utility or ratepayer or upon the commission's own motion and after public notice, opportunity for comment and a hearing *if any party requests a hearing* (emphasis added), the commission by order may authorize deferral of the following amounts for later incorporation in rates...." ORS 757.259 (2).

The OPUC noticed PGE's filing on December 27, 2021, and opened Docket No. UM 2217, but did not indicate any ability for any person to become a formal party to Docket UM 2217¹. This notice did not provide any information on how an interested person could become a party to this docket. PGE only provided notice to the service list in OPUC docket UE 394. I note that the term party is not capitalized in ORS 757.259 and there is no definition of party in the subject statute ORS 757.

For reasons including, but not limited to the issues I identify below, I respectfully request that the Commission accept these comments and set PGE's request for hearing in Docket No. UM 2217. Should the Commission determine that I do not have standing to request such hearing because I am not a "party" in UM 2217, I respectfully request that the Commission waive the requirement of ORS 757.259 that only a "party" may request a hearing be held pursuant to a utility's Application under ORS 757.259.

Defects in PGE's Application

PGE does not have the authority to file this deferral request with the OPUC and OPUC has no authority under ORS 757.259 to approve PGE's Application for Deferral. PGE seeks to defer the collection of

¹ December 27, 2021, letter to OPUC Filing Center signed by Jaki Ferchland, Manager, Revenue Requirements

revenues that PGE collects under transmission rates which are the sole authority of the Federal Energy Regulatory Commission.

There is no evidence that PGE or the OPUC have provided notice of this Application to FERC or to the service list established by FERC in PGE’s current transmission rate case before FERC

PGE’s application states that “PGE filed this application to track all revenues resulting from the change in the OATT rate as authorized by (OPUC) Order No. 19-400.”² OPUC Order No. 19-400 contains no such authorization.³

PGE’s application further states that “PGE has not otherwise included any forecast or estimate of the change in transmission revenue in customer prices through a general rate case *or any other proceeding.*”⁴ (emphasis added)” This statement by PGE is contrary to the plain facts. FERC does not allow a Transmission Provider to place new rates into effect without demonstrating that the new rates are just and reasonable. FERC, as does the OPUC, requires a utility to demonstrate how any revenue requirement will be equitably allocated to rate classes, and to provide a supportable forecast of the incremental revenue that will be earned from each rate class under the changed rates.

FERC made PGE’s new transmission rates effective January 1, 2022, subject to refund. (Attachment 1) based upon PGE’s representations. PGE’s filing at FERC supporting the new transmission rates contains a Statement (Period 1 Statement BJ, included as Attachment II to these comments) that explicitly identifies the incremental revenue forecasted to be collected from PGE customers under these changed rates in 2022. These incremental revenues are summarized in Table 1 below.

	Revenue Under Present Rates	Revenue Under Changed Rates	Incremental Annual Revenue Under Changed Rates Effective 1/1/2022	Percent Increase in Revenues Under New Rates
Long-Term Firm PTP - PGEM	\$11,893,000	\$19,525,000	\$7,632,000	64.2%
Long-Term Firm PTP-Other	\$4,807,000	\$7,892,000	\$3,085,000	64.2%
NITS - PGEM	\$9,625,000	\$28,703,000	\$19,078,000	198.2%
NITS - BPA	\$43,000	\$128,000	\$85,000	197.7%
NITS - ESS	\$1,237,000	\$2,794,000	\$1,557,000	125.9%
TOTAL REVENUE	\$27,605,000	\$59,042,000	\$31,437,000	113.9%

Source: PGE October 28 Rate Filing at FERC in Docket ER22-233-000 Exhibit No. PGE 301, Period 1 Statement BJ, Page 90 of 103

FERC placed PGE’s new transmission rates into effect on January 1, 2022, based in part upon PGE’s representations summarized in Table 1. PGE represents that the newly effective transmission rates are expected to collect \$31,437,000 in incremental revenues from all rate classes in Calendar Year 2022 compared to the transmission rates that were in effect on December 31, 2001. PGE further represents that these newly effective transmission rates are expected to collect \$19,078,000 in incremental

² PGE Application in UM 2217 p2

³ OPUC Order No. 19-400 in Docket No. UM 2031

⁴ PGE Application in UM 2217 p2

revenues from PGE's native load customers (i.e., residential/commercial/Industrial customers under rate class "NITS – PGEM) in 2022.

PGE's filing in this docket UM 2217 is deficient in that PGE has not specifically identified the revenues that it wants to defer (i.e., \$31,437,000 in 2002). Further, PGE began deferring these revenues effective January 1 of 2022 without regulatory approval from either the OPUC or FERC.

Relief Requested

I respectfully request that:

1. OPUC set PGE's Application in Docket No. 2217 for hearing pursuant to ORS 757.259.
2. Extend the comment period for this docket (OPUC Docket No. UM 2217) and provide notice of PGE's Application in OPUC Docket No. UM 2217 to FERC and all parties to PGE's FERC Rate Case (FERC Docket No. ER22-233-000)

As a courtesy, I will provide FERC with a copy of these comments.

Regards,

Steve Knudsen

steve@threeboys.com

cc. Jaki Ferchland, Manager of Revenue Requirement, Portland General Electric

Jacquelyn.ferchland@pgn.com

Attachments:

Attachment 1: PGE Transmission Filing at FERC in Docket No. ER22-233-000 may be retrieved from the FERC website at https://elibrary.ferc.gov/eLibrary/docketsheet?docket_number=er22-233&sub_docket=All&dt_from=1960-01-01&dt_to=2022-01-25&chklegadata=false&pageNm=dsearch&date_range=custom&search_type=docket&date_type=filed_date&sub_docket_q=Allsub

Attachment 2 PGE Forecast of Incremental Revenues under revised transmission rates in effect January 1, 2022

**PORTLAND GENERAL ELECTRIC
TRANSMISSION TARIFF FILING
PERIOD I STATEMENT BJ
THOUSANDS (\$000)**

Line No.	Table Title and Key Content	PERIOD I	PERIOD I	PERIOD II	PERIOD II	Line No.
		2020	Stmt Ref	2022	Stmt Ref	
134						134
135	<u>Revenue Under Changed Rates</u>					135
136	Long-Term Firm PTP - PGEM	19,525	BG	28,931	BG	136
137	Long-Term Firm PTP - Other	7,892	BG	11,694	BG	137
138	NITS - PGEM	28,703	BG	45,019	BG	138
139	NITS - BPA	128	BG	191	BG	139
140	NITS - ESS	2,794	BG	4,461	BG	140
141						141
142	<u>Revenue Under Present Rates</u>					142
143	Long-Term Firm PTP - PGEM	11,893	BH	11,893	BH	143
144	Long-Term Firm PTP - Other	4,807	BH	4,807	BH	144
145	NITS - PGEM	9,625	BH	9,871	BH	145
146	NITS - BPA	43	BH	42	BH	146
147	Retail NITS - ESS	1,237	BH	1,331	BH	147