

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 416**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision; and
2024 Annual Power Cost Update.

ISSUES LIST

Pursuant to the Prehearing Conference Memorandum filed March 13, 2023, Portland General Electric Company, on behalf of the parties, submits the following list of outstanding issues to be determined by the Commission.

1. Power Cost Adjustment Mechanism

- A. Should the Commission modify the existing PCAM Principles?
- B. Should the Commission modify the current cost recovery mechanism for PGE's PCAM? If so, how?
 - i. Does the Commission wish to adopt the PCAM modifications proposed by PGE?
 - ii. Does the Commission wish to adopt CUB's proposed modification to the PCAM deadband of 100/50 basis points?
 - iii. Does the Commission wish to adopt Staff's alternative proposed multi-tiered approach?

2. Decoupling

- A. Should a decoupling mechanism be reinstated? If so, how should it be designed?

3. Associated Energy Storage Treatment

- A. Should the Commission recognize standalone energy storage at the transmission-voltage level as "Associated Energy Storage" for purposes of the Renewable Automatic Adjustment Clause (RAAC), Schedule 122?
- B. Should the Commission adopt Staff's recommendation to open an investigatory docket into the definition of associated energy storage under the renewable portfolio standard and the use of the RAAC in light of HB 2021?

4. Deferrals and AACs

- A. Should the Commission recognize the deferral mechanism as a separate mechanism from the AAC mechanism?
- B. Should all AACs be presumed to be subject to an earnings test?
- C. Regardless of whether an earnings test is presumed for all AACs, should an earnings test apply to schedules 150 and 153, as CUB proposes?
- D. Should the Commission adopt CUB's proposal that all trackers should have sunset dates of not more than three years from their inception and that once the sunset date is reached, PGE must justify continuing the tracker in the opening testimony of the next general rate case?
- E. Should certain deferrals be consolidated or eliminated?

5. Miscellaneous Revenue Requirements Items

- A. Should the Commission adopt AWEC's proposal to change State Income Tax accounting from the current normalization method to a flow-through method?
- B. How should rate base be determined?
- C. Should the Commission adopt AWEC's proposal to adjust the rental rate charged to PGE for the World Trade Center location?
- D. Should the Commission adopt Staff's proposal to adjust the price and quantity of Fuel Stock?
- E. Should the Commission allow PGE to include the current balance of CO2 Allowances?

6. T&D: Routine Vegetation Management (RVM)

- A. What amount of RVM cost should PGE recover in base rates for the 2024 test year?
- B. Should the Commission adopt Staff's proposed performance based rate (PBR) mechanism for RVM to impose an earnings test on the first \$6 million of incremental RVM spend beyond what is in base rates?
- C. Should there be a balancing account for any incremental/decremental amount spent beyond the levels established in subpart A.? If so, should the amounts in the balancing account be subject to a deferral and an earnings test?

7. Production

- A. Should the Commission adopt a proposed reduction to costs recovered for generation outside services?

- B. Should a Qualifying Facilities Pass-Through Mechanism be established to address the volumetric and price risk associated with PURPA mandated QF projects?

8. Compensation

- A. Should the Commission adopt Staff’s unresolved adjustment to the Test Year wages and salary expense and rate base?

- B. Should the Commission adopt CUB’s proposal to reduce the PGE-offered employee discount on electric service from the current 25% to 5%?

9. Property Insurance Premiums

- A. What amount of costs should be recognized for Property Insurance premium rates?

10. ROE

- A. What should be PGE’s authorized Return on Equity (ROE)?

11. Income Qualified Discount Program

- A. What changes does the Commission think are appropriate design parameters for the Income Qualified Bill Discount Program?

- B. Should PGE conduct or contract for a Low Income Needs Assessment Study and if so, what requirements should apply, i.e., date by which study is completed?

12. Additional Energy Justice Items

- A. Should the Commission initiate a proceeding (which authorizes discovery or discovery like access to data) to reform residential customer rates to limit energy burden in the long run?

- B. Should the Commission initiate an investigation to determine criteria/metrics/processes all utilities shall employ to comprehensively integrate energy justice into decision making and, specifically, all facets of a general rate case?

C. Should the Commission convene a multi-agency (including OHCS, ETO, ODOE) proceeding to identify how to better utilize weatherization programs to address energy burden as directed by HB 2475 (2021)?

DATED this 15th day of September, 2023.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'KSB', is positioned above the typed name.

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