

KATHERINE MCDOWELL Direct (503) 290-3629 katherine@mrg-law.com

May 11, 2022

VIA ELECTRONIC FILING

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

Re: UE 394 – In re Portland General Electric Company, Request for a General Rate *Revision*.

Attention Filing Center:

Attached for filing in the above-referenced docket is Portland General Electric Company's (PGE) Erratum to the Motion for Clarification filed May 10, 2022. PGE inadvertently did not include in its original filing a complete statement of the Oregon Citizen Utility Board's (CUB) position regarding the request for expedited treatment. This erratum filing revises page 2 of the Motion for Clarification to reflect CUB's position, confirmed after reviewing the Motion for Clarification, that CUB prefers a 15-day response timeline at this time.

Please contact this office with any questions.

Sincerely,

Katherine McDowell

Attachment

on the procedures for evaluating deferral authorizations or deferral amortizations. These
clarifications are consistent with the Commission's established practice of dealing with deferrals
on a case-specific basis and addressing earnings issues concurrently with a prudence review.

While PGE is continuing to analyze Order No. 22-129 for purposes of seeking reconsideration, rehearing, or filing an appeal, PGE is filing this narrow motion now to address the urgent need for clarification regarding the scope of the Commission's decision.¹ PGE requests expedited consideration of this motion because PGE is experiencing financial harm as a result of the investment community's interpretation of the order. Absent an expedited ruling and clarification from the Commission, PGE expects that the financial community will continue to interpret the order as it has, perpetuating negative consequences to both PGE and its customers.

11 Pursuant to OAR 860-001-0420(6), PGE certifies that it has attempted to contact all parties 12 on the service list for this case to discuss this motion and determine their positions. The Alliance 13 of Western Energy Consumers (AWEC) does not oppose the motion for clarification. Public 14 Utility Commission of Oregon Staff (Staff) and the Small Business Utility Advocate (SBUA) do 15 not take a position on the motion for clarification or the request for expedited treatment at this 16 time. The Oregon Citizens' Utility Board (CUB) also does not take a position on the motion for 17 clarification at this time. No other party had provided its position as of the time of filing. PGE 18 proposes that responses to this motion be due in one week, with a reply period of two business 19 days for PGE. CUB indicated that it prefers a 15-day deadline for responses to the motion.

¹ PGE reserves its right to seek reconsideration or rehearing with respect to Order No. 22-129. The filing of this motion for clarification does not waive any objection or argument PGE may have against any aspect of Order No. 22-129, including but not limited to the Commission's adoption of an earnings review for the 2020 wildfire and 2021 ice storm deferrals.