

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2152**

In the Matter of)	
)	OREGON CITIZENS' UTILITY
PORTLAND GENERAL ELECTRIC)	BOARD'S AND ALLIANCE OF
COMPANY,)	WESTERN ENERGY CONSUMER'S
)	JOINT MOTION TO DESIGNATE
Detailed Depreciation Study.)	DOCKET AS ELIGIBLE PROCEEDING
<hr/>)	FOR ISSUE FUNDS

Pursuant to Section 1(c)(v) of the Fourth Amended Intervenor Funding Agreement (“IFA”), approved on January 17, 2018 by the Public Utility Commission of Oregon

(“Commission”) in Order No. 18-017, the Oregon Citizens’ Utility Board (“CUB”) and Alliance of Western Energy Consumers (“AWEC”) file this motion to designate the above-referenced docket as eligible for an Issue Fund Grant.

This docket will directly affect Portland General Electric Company (PGE) which is a Participating Public Utility under Section 1(n) of the Restated IFA and is participating in this docket.

Section 1(c)(v) of the IFA defines “Eligible Proceeding for Issue Funds” as, among other things, a proceeding “so designated by the Commission that directly affects one or more of the Participating Utilities and is anticipated to have a substantial impact on utility rates or service, a significant impact on utility customers or the operations of the utility, is likely to result in a significant change in regulatory policy, or raises novel questions of fact or law.”

CUB and AWEC anticipate this proceeding will have a substantial impact on utility rates or terms of service, and an attendant significant impact on both utility customers and operations. This proceeding involves a detailed depreciation study of PGE’s electric properties as of December 31, 2019. PGE’s last depreciation study was filed in 2016 in UM 1809. PGE requests that the Commission approve the results of the study so that the new depreciation rates can be implemented in the Company’s next general rate case filing, which is forthcoming this year. Therefore, the depreciation rates approved in this proceeding will immediately flow into customer rates following the outcome of the GRC. This depreciation study recommends revisions in depreciation lives, curves, and salvage rates for all of PGE’s plant accounts. There are also significant policy and ratemaking issues at play in this proceeding. For example, PGE is proposing an adjustment to the end-of-life of its share of the Colstrip coal plant from December 31, 2030 to December 31, 2027. PGE cites Oregon’s decarbonization goals, such as Governor Brown’s Executive Order No. 20-04. CUB and AWEC plan to investigate whether the new end-of-life date aligns with Oregon’s state and regulatory policy. CUB and AWEC will also review all other proposed end-of-life adjustments to ensure that any change to depreciation rates are fair, just, and reasonable.

///

///

///

///

///

///

Therefore, for the foregoing reasons, CUB and AWEC respectfully move the Commission to designate this proceeding as an “Eligible Proceeding for Issue Funds” under the IFA.

Dated this 16th day of April, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Corinne O. Milinovich

Corinne O. Milinovich
1750 SW Harbor Way, Suite 450
Portland, Oregon 97201
(503) 241-7242 (phone)
(503) 241-8160 (facsimile)
com@dvclaw.com
Of Attorneys for the
Alliance of Western Energy Consumers



Michael Goetz
OSB No. 141465
General Counsel
Oregon Citizens' Utility Board
610 SW Broadway, Ste. 400
Portland, OR 97205
T. 503.227.1984
E. mike@oregoncub.org