



**Portland General Electric Company**  
121 SW Salmon Street • Portland, Oregon 97204  
PortlandGeneral.com

June 29, 2012

*E-Filing and US Mail*  
puc.filingcenter@state.or.us.

Public Utility Commission of Oregon  
550 Capitol St., NE, No. 215  
PO Box 2148  
Salem, OR 97308-2148

**Attention: Commission Filing Center:**

Re: **UM 1103**  
PGE's Application for Reauthorization to Defer Intervenor Funding Costs

Enclosed are the signed original and five copies of Portland General Electric Company's Application for Reauthorization to Defer Intervenor Funding Costs. This document is being filed by electronic mail with the Filing Center.

The Notice of Application was provided to the UE 215 and UM 1103 electronic service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7580, or Launa Harmon (503) 464-7251.

Please direct all formal correspondence, questions, or requests to the following e-mail address [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com).

Sincerely,

Patrick G. Hager  
Manager, Regulatory Affairs

encls.

cc: UE 215 and  
UM 1103 service lists

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**UM 1103**

In the Matter of the Application of	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	Application For Reauthorization
For an Accounting Order Approving Deferral of Costs	)	To Defer Intervenor Funding
Related to Intervenor Funding	)	Costs

Pursuant to OAR 860-027-0300, ORS 757.259 (3), ORS 757.072, the Oregon Public Utility Commission (the "Commission") Intervenor Funding Order No. 03-388, and the latest reauthorization, Commission Order 11-282, which approved Portland General Electric Company's ("PGE's") Intervenor Funding Deferral, PGE requests reauthorization to defer and amortize intervenor funding costs, as described below, for the 12-month period July 1, 2012 through June 30, 2013<sup>1</sup>.

I. Deferral History:

Commission Order No. 03-388 approved an agreement, pursuant to the Intervenor Funding Act, between PGE, Pacific Power and Light (dba PacifiCorp), Northwest Natural Gas Company, Northwest Industrial Gas Users, Citizens' Utility Board of Oregon ("CUB"), and Industrial Customers of Northwest Utilities ("ICNU"), dated February 3, 2003 (the "Intervenor Funding Agreement"). This agreement specified the terms and conditions for intervenor funding grants, funding amounts to be contributed by each utility, and the payment of grants by utilities into three funds, which include the CUB Fund, the Pre-authorized Matching Fund, and the Issue Fund.

PGE filed an application with the OPUC for an accounting order authorizing PGE to defer these costs, which was approved and adopted by the Commission on September 11, 2003, in Order No. 03-561. Table 1 below lists reauthorization details for this deferral.

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<sup>1</sup> Although current authority for intervenor funding expires 12/31/12, PGE expects that intervenor funding may be reauthorized.

On December 19, 2007, the OPUC approved the First Amended and Restated Intervenor Funding Agreement (“IFA”) that extended intervenor funding through December 12, 2012 (OPUC Order 07-564). The restated IFA amends and clarifies the use of funds for dockets that extend over two or more calendar years, modifies some of the original terms and conditions, adds new reporting requirements, and changes the funding amounts to be contributed by each utility, as well as adds new accounts for additional participating utilities.

PGE filed and received reauthorization for this deferral, as shown below.

**Table 1**

<b>Filing Date</b>	<b>Renewal Period</b>	<b>Order No.</b>	<b>Approval Date</b>
8/11/03	6/30/04	03-561*	9/17/03
5/20/04	7/01/04-6/30/05	04-363	6/28/04
5/13/05	7/01/05-6/30/06	05-816	6/29/05
6/07/06	7/01/06-6/30/07	06-412	7/17/06
6/07/07	7/01/07-6/30/08	07-324	7/27/07
6/05/08	7/01/08-6/30/09	08-442	8/28/08
6/02/09	7/01/09-6/30/10	09-268	7/13/09
6/15/10	7/01/10-6/30/11	10-342	9/2/10
6/22/11	7/01/11-6/30/12	11-282	08/1/11

\* Initial Application

Pursuant to Commission Orders listed above, PGE respectfully requests an Order reauthorizing the deferral for later rate-making treatment, of all payments made by PGE between July 1, 2012 and June 30, 2013, to intervenors under the three intervenor funds established according to the IFA.

**II. OAR 860-027-0030 Requirements:**

The following is provided pursuant to ORS 860-027-0300(3):

a. Description of utility expense or revenue

For the 12-month period of July 1, 2012 through June 30, 2013, PGE seeks reauthorization to continue recording, in a deferred account, all amounts it is required to pay to the CUB Fund, the Pre-authorized Matching Fund, and the Issue Fund.

b. Reasons for Deferral

PGE will continue to incur Intervenor Funding expenses until December 12, 2012, pursuant to the IFA adopted in OPUC Order No. 07-564. PGE wishes to continue to use the deferral mechanism as approved, including any expenses accrued under an amended agreement. Without reauthorization, the current authorization to defer costs will expire on June 30, 2012.

Commission Order No. 03-561 authorized PGE's accounting process for the grant funds. PGE has been deferring funds pursuant to the Intervenor Funding Agreement since 2003, and the latest Commission Order No. 11-282, is about to expire. PGE requests that the deferral continue. Moreover, PGE requests that the additional amounts it is required to pay to the three funds during the period of July 1, 2012 through June 30, 2013, be treated similarly.

c. Proposed Accounting

PGE proposes to record all deferred costs in FERC Account 182.3 (Other Regulatory Assets). In the absence of a deferred accounting order from the Commission, PGE would continue to record costs associated with the intervenor funding costs to FERC account 928 Regulatory Commission Expenses.

d. Amounts Subject to Deferral and Estimates of Amounts

PGE anticipates the maximum amounts to be deferred, during the 12-month period subsequent to the filing of this Application, will be<sup>2</sup>:

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<sup>2</sup> The Intervenor Funding Agreement was amended and restated through OPUC Order No. 07-564, extending intervenor funding until December 31, 2012.

<u>CUB FUND</u>	<u>MATCHING FUND</u>	<u>ISSUE FUND</u>
\$57,500	\$57,500	\$125,000

Based on this, PGE estimates the intervenor funding account balances will be:

<u>Fund Description</u>	<u>June 2012 Balance</u>	<u>2013 Accrual</u>	<u>JUNE 2013 Estimated Balance</u>
CUB	88,190	57,500	145,690
MATCHING	88,715	57,500	146,215
ISSUE	66,048	125,000	191,048
	242,953	240,000	\$482,953

PGE began amortization of these funds through Advice 07-029, which became effective January 1, 2008.

The Intervenor Funding Agreement permits intervenors to request grants from the various funds at any time during the calendar year, though the deferral periods have generally run from July 1 to June 30. Amounts will be debited to the deferral account as funds are actually disbursed. *See* Commission Order No. 03-561, Appendix A, Page 3. Balances in the funds may rollover into the following year if intervenors do not use the entire amount available, and some funds (the CUB and Matching Funds) permit intervenors to request advances from future-year funds.

Pursuant to the terms of the Intervenor Funding Agreement, individual fund costs will be allocated to the appropriate customer class: the CUB fund will be charged to residential customers; the Pre-authorized Matching Fund (ICNU) will be charged to industrial customers, and the Issue Fund costs will be aligned and allocated to keep the intended beneficiaries of the advocacy undertaken on their behalf.

e. Notice

A copy of the Notice of Application for Reauthorization to Defer Intervenor Funding Costs and a list of the persons served with the notice are attached to the Application as Attachment A.

(OAR 860-027-0300 [6]).

III. The following is provided pursuant to OAR 860-027-0300(4):

a. Description of Deferred Account Entries between July 2012 and June 2013:

Please see section II (d) above for balances and accruals as of June 30, 2012.

b. The reason for continuing deferred accounting

PGE is seeking approval to continue the Intervenor Funding Deferral pursuant to the latest Commission Order No. 11-282 as described in Section (II)(b) above.

IV. PGE Contacts: The authorized address to receive notices and communications in respect of this Application is:

Patrick G. Hager  
Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, OR 97204  
(503) 464-7580 (telephone)  
(503) 464-7651 (facsimile)  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Doug C. Tingey  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1 WTC1301  
Portland, OR 97204  
(503) 464-8926 (telephone)  
(503) 464-2200 (facsimile)  
[doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

In addition, the names and addresses to receive notices and communications via the e-mail service list are:

Launa Harmon  
E-Mail: [Launa.Harmon@pgn.com](mailto:Launa.Harmon@pgn.com)

V. Summary of Filing Conditions<sup>3</sup>:

Information related to future amortization is listed below:

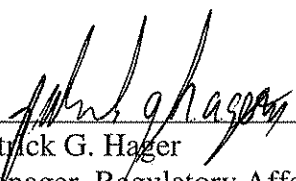
- a. Earnings Review: None Required. The deferral is made in accordance with Commission Order No. 03-388, which states: "...The Commission shall allow the Participating Public Utilities to recover in rates all amounts paid for Intervenor Funding Grants under this Agreement. If a Participating Public Utility seeks rate recovery through a deferred account, the account and amortization of the account shall be exempt from the amortization caps and earnings test set forth in subsections 4, 5, and 7 of ORS 757.259 ..."
- b. Prudence: A prudence review will be performed prior to amortization.
- c. Sharing (Percents): None applicable.
- d. Rate Spread/Rate Design: See Section II ( c ) above. Rates are spread on a cents per kilowatt-hour basis.

VI. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the existing balances in the deferred account and authorization to defer any additional Intervenor Funding costs paid by PGE during the period July 1, 2012 to June 30, 2013.

DATED this 29<sup>th</sup> day of June, 2012.

Respectfully Submitted,

  
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Patrick G. Hager  
Manager, Regulatory Affairs  
On Behalf of  
Portland General Electric Company

um 1103\_ pge reauth app\_(6-29-12).docx

<sup>3</sup> Per agreement with OPUC staff on January 24, 2012

**Attachment A**

**Notice of Application for Reauthorization  
to Defer Intervenor Funding Costs**



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1103**

In the Matter of the Application of Portland  
General Electric Company for an Order to  
Reauthorize the Deferral of Intervenor  
Funding Costs

Notice of Application  
For Reauthorization  
To Defer Intervenor  
Funding Costs

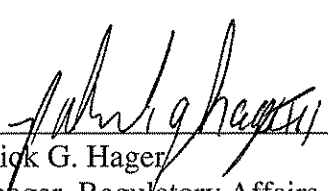
On June 29, 2012, Portland General Electric Company ("PGE") filed an Application with the Oregon Public Utility Commission (the "Commission") for an Order reauthorizing deferral of its intervenor funding costs.

Approval of PGE's Application will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Persons who wish to obtain a copy of PGE's application will be able to access it on the OPUC website.

Any person who wishes to submit written comments to the Commission on PGE's Application must do so no later than July 30, 2012.

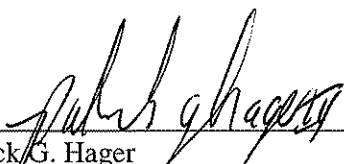
Dated this 29<sup>th</sup> day of June, 2012.

  
\_\_\_\_\_  
Patrick G. Hager  
Manager, Regulatory Affairs  
On Behalf of  
Portland General Electric Company

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing Notice of Application for Reauthorization to Defer Intervenor Funding Costs to be served by Electronic Mail to those parties whose e-mail addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, upon those parties on the attached service list who have who have not waived paper service or who have been approved to receive hard copy service for OPUC Docket No. UE 215 and UM 1103.

Dated at Portland, Oregon, this 29th day of June, 2012.



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Portland, OR 97204  
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**SERVICE LIST –  
OPUC DOCKET # UE 215**

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<p>Randall J. Falkenberg (C)            RFI CONSULTING, INC.</p>	<p>Gregory M. Adams            RICHARDSON &amp; O'LEARY, PLLC</p>

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**SERVICE LIST –  
OPUC DOCKET # UM 1103**

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