



Portland General Electric
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June 27, 2018

E-File

puc.filingcenter@state.or.us

Public Utility Commission of Oregon
201 High Street, SE
P. O. Box 1088
Salem, OR 97308-1088

Attn: Commission Filing Center

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

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Intervenor Funding Costs associated with Intervenor Funding, with an effective date of July 01, 2018.

PGE received authorization to continue to defer expenses through OPUC Order 17-349. A Notice of Application has been provided to the parties on the UM 1103 and UE 335 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7805, or Launa Harmon at (503) 464-7251.

Please direct all formal correspondence, questions, or requests to the following e-mail address pge.opuc.filings@pgn.com.

Sincerely,

A handwritten signature in blue ink that reads "Stefan Brown" followed by "for" written below it.

Stefan Brown
Manager, Regulatory Affairs

np: SB

Enclosures

cc: UM 1103 & UE 335 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 Public Utility Commission of Oregon (“Commission”) Intervenor Funding Orders No. 03-388 and 18-017, and the latest reauthorization, Commission Order No. 17-349, which approved the Intervenor Funding Deferral of Portland General Electric Company (“PGE”). PGE requests reauthorization to defer intervenor funding costs as described below, for the 12-month period July 1, 2018 through June 30, 2019.

I. Deferral History:

Commission Order No. 03-388 approved an Intervenor Funding Agreement (“IFA”), 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. 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.

The Table below lists IFA approvals and amendments.

	OPUC Order No.	Docket No.	Effective Date	Expiration Date
Original Agreement	03-388	AR 462	7/02/2003	12/31/07
First Amendment	07-564	UM 1357	12/19/2007	12/31/12
Second Amendment	12-452	UM 1357	1/01/2013	12/31/17

Third Amendment	15-335	UM 1357	10/02/15 ¹	12/31/17
Fourth Amendment	18-017	UM 1929	1/17/2018	12/31/2022

These amended IFAs clarify the use of funds for docket, modify terms and conditions, and change the funding amounts to be contributed by each utility. Order No. 18-017 supersedes and replaces all previous IFA orders.

PGE filed an application with the Commission for an order authorizing PGE to defer these costs, which was approved and adopted by the Commission on September 11, 2003, in Order No. 03-561 (entered on September 17, 2003).

PGE requests reauthorization to defer intervenor funding costs, as described below, for the 12-month period July 1, 2018 through June 30, 2019. The table below itemizes the Commission approved reauthorizations for this deferral.

Table 1

Filing Date	Renewal Period	Order No.	Approval Date
6/14/2017	7/01/17-6/30/18	17-349	9/14/17
6/23/2016	7/01/16-6/30/17	16-295	8/02/16
6/22/2015	7/01/15-6/30/16	15-269	9/08/15
6/26/2014	7/01/14-6/30/15	14-270	7/01/14
6/27/2013	7/01/13-6/30/14	13-287	8/06/13
6/29/2012	7/01/12-6/30/13	12-311	8/14/12
6/22/2011	7/01/11-6/30/12	11-282	8/01/11
6/15/2010	7/01/10-6/30/11	10-342	9/02/10
6/02/2009	7/01/09-6/30/10	09-268	7/13/09
6/05/2008	7/01/08-6/30/09	08-442	8/28/08
6/07/2007	7/01/07-6/30/08	07-324	7/27/07
6/07/2006	7/01/06-6/30/07	06-412	7/17/06
5/13/2005	7/01/05-6/30/06	05-816	6/29/05
5/20/2004	7/01/04-6/30/05	04-363	6/28/04
8/11/2003	7/01/03-6/30/04	03-561*	9/17/03

* *Initial application*

Pursuant to the Commission Orders listed above, PGE respectfully requests an Order reauthorizing the deferral for later rate-making treatment of all payments made by PGE between

¹ The IFA provided for fund increases only, reflecting significant growth in regulatory activity related to natural gas utilities, and made no other changes to the Second Amended and Restated Intervenor Funding Agreement.

July 1, 2018 and June 30, 2019, to intervenors under the three funds established according to the most recent 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, 2018 through June 30, 2019, 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

Commission Order No. 03-561 authorized PGE's accounting process for the grant funds. PGE has been deferring funds pursuant to the IFA since 2003, and the latest Commission Order No. 17-349, is about to expire. PGE will continue to incur IFA expenses until December 31, 2022, pursuant to the Fourth Amended and Restated IFA, OPUC Order No. 18-017. Without reauthorization, the current authorization to defer costs will expire on June 30, 2018.

PGE requests that the deferral continue. PGE wishes to continue to use the deferral mechanism as approved in Order 17-349, including any expenses accrued, under the fourth amendment of the IFA. Moreover, PGE requests that the additional amounts it is required to pay to the three funds during the period of July 1, 2018 through June 30, 2019, 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 record costs associated with the intervenor funding costs to FERC account 928 Regulatory Commission Expenses.

d. Estimates of Amounts to be Recorded for the next 12 months

PGE anticipates the maximum amounts to be deferred, during the 12-month period subsequent

to the filing of this application, will be:²

<u>CUB FUND</u>	<u>MATCHING FUND</u>	<u>ISSUE FUND</u>
\$101,125	\$72,738	\$143,750

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

<u>Fund Description</u>	<u>Balance June 1, 2018</u>	<u>Accrual 2018*</u>	<u>Estimated Balance 2019</u>
CUB	\$ 142,311.10	101,125	\$243,436.10
Matching	\$ 86,228.53	72,738	\$158,966.53
ISSUE	<u>\$180,149.37</u>	<u>143,750</u>	<u>\$323,899.37</u>
	Estimated Total Balance		\$726,302.00

**subject to change as amounts are amended through a renewal of the IFA.*

Attachment B lists the individual postings for each funding account to date. PGE amortized these funds in 2008 through Advice No. 07-029, in 2011 through Advice No. 10-022A, and in January 2017 through Advice No. 16-20. As the IFA renewal modifies funding payment amounts, PGE will update those accruals and estimated balances as appropriate.

The current IFA permits intervenors to request grants from the various funds at any time during the calendar year, though this deferral period runs from July 1, 2018 to June 30, 2019. Amounts will be debited to the deferral account as funds are actually disbursed. See Commission Order No. 18-017, Appendix A, Page 12. 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.

² The Intervenor Funding Agreement (IFA) was amended and restated through OPUC Order No. 18-017, continuing intervenor funding through December 31, 2022, and establishing Annual Grant amounts to be made available for each utility account.

Pursuant to the terms of the IFA, 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 will be charged to industrial customers, and the Issue Fund costs will be aligned and allocated to 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 2018 and June 2019:

Please see section II (d) above for estimated balances and expected accruals through June 30, 2019.

b. The reason for continuing deferred accounting

PGE is seeking approval to continue the IFA Deferral pursuant to the latest Commission Order No. 17-349 as described in Section (II)(b) above, and the new IFA Agreement through December of 2022.

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

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
(503) 464-7805 (telephone)
(503) 464-7651 (facsimile)
E-Mail: pge.opuc.filings@pgn.com

Doug C. Tingey
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
(503) 464-8926 (telephone)
(503) 464-2200 (facsimile)
E-Mail: 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

V. Summary of Filing Conditions:

Information related to future amortization is listed below:

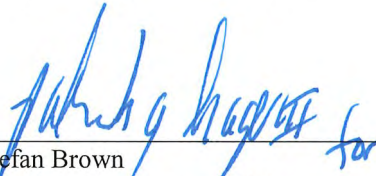
- a. Earnings Review: None Required. The deferral is made in accordance with Commission Order No. 03-388, which states: “The Commission shall allow the Participating Public Utilities to recover in rates all amounts paid for Intervenor Funding Grants under this Agreement. If a Participating Public Utility 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 5, 6, 7, 8 and 10 of ORS 757.259.” The IFA’s term was renewed through OPUC Order 18-017 and expires in December of 2022.
- b. Prudence: A prudence review will be performed prior to amortization.
- c. Sharing (Percents): Not subject to sharing mechanism.
- d. Rate Spread/Rate Design: See Section II (c) above. Rates are spread on a cents per kilowatt-hour basis to the appropriate customer classes per OPUC Order 18-017, Appendix A, Page 27.
- e. Three Percent Test [(ORS 757.259(6))]: The three percent does not apply to amortization of this deferral.

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 01, 2018 to June 30, 2019.

DATED this 27th day of June, 2018.

Respectfully Submitted,



Stefan Brown
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UM 1103

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 27, 2018, Portland General Electric Company ("PGE") filed an Application with the Public Utility Commission of Oregon (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 28, 2018.

Dated this 27th day of June, 2018.



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UM 1103

Attachment B

Postings to Individual Funding Accounts

CUB Fund

ICNU Matching Fund

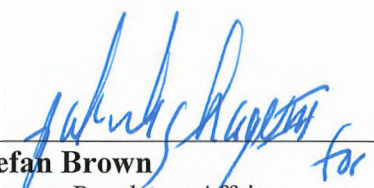
and

Issue Fund

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 lists for OPUC Dockets No. UM 1103 and UE 335.

Dated at Portland, Oregon, this 27th day of June, 2018.



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