



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

November 12, 2010

E-Filing and US Mail

Filing Center
Public Utility Commission of Oregon
550 Capitol Street, NE, Suite 215
Salem, OR 97301-2148

Re: Application for Reauthorization of ISFSI Tax Credit Deferral UM 1186

Enclosed for filing are the original and one copy of Portland General Electric Company's Application for Reauthorization to Defer ISFSI Tax Credits for December 31, 2010 through December 30, 2011.

PGE originally received permission to defer Independent Spent Fuel Storage Installation State Tax Credits through OPUC Order No. 05-136. The deferral authorization period began December 30, 2004, with annual reauthorization approvals through OPUC Order Nos. 05-136, 06-117, 07-084, 08-152, 08-616 and 09-475.

We have provided copies of a Notice of Application to the UE 197 service list. PGE waives paper service of documents in this proceeding and has E-filed a copy on this date.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me (503-464-7580), or Jay Tinker (503-464-7002).

Sincerely,

Patrick G. Hager
Manager, Regulatory Affairs

encls.

cc: Gordon Feigner, CUB
Melinda Davison, ICNU
Carla Owings, OPUC
UE 197 Service List

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1186

In the Matter of the Application of Portland
General Electric Company for an Order to
Reauthorize the Deferral of Independent Spent
Fuel Storage Installation State Tax Credit Cost
Reduction

Application For Reauthorization To
Defer ISFSI State Tax Credits

Pursuant to ORS 757.259, OAR 860-027-0300 and OPUC Order No.09-475, Portland General Electric Company ("PGE") requests reauthorization to defer for later ratemaking treatment certain Independent Spent Fuel Storage Installation (ISFSI) state tax credits, for December 31, 2010, through December 30, 2011, (the "Deferral Period").

I. Deferral History:

On December 9, 2004, the Environmental Quality Commission granted PGE approval of the final certification of ISFSI expenditures, authorizing state tax credits totaling \$21.1 million (50% of PGE's share of the certified costs). The credits are authorized for use on a straight-line basis over ten years, with a carry-forward provision that allows any particular tax year's provision to be postponed for up to three tax years.

The ISFSI is a dry cask storage system, which provided storage for the spent nuclear fuel assemblies and radioactive waste generated at the Trojan plant during the years in which it produced energy. PGE, PacifiCorp, and the Eugene Water and Electric Board jointly own the Trojan plant.

On December 30, 2004, PGE filed and requested authorization to defer for later ratemaking treatment those cost reductions associated with the use of ISFSI Oregon state

tax credits. PGE received approval of the deferral for the 2004 tax year on March 15, 2005. (See OPUC Order No. 05-136).

PGE has since filed and received reauthorization for this deferral, as shown in Table 1 below:

Table 1

Filing Date	Renewal Period	Tax year	Order No.	Approval Date
12-30-05	12/31/05 – 12/30/06	2005	06-117	03-13-06
12-15-06	12/31/06 - 12/30/07	2006	07-084	03-05-07
12-21-07	12/31/07 - 12/30/08	2007	08-152	03-04-08
11-18-08	12/31/08 - 12/30/09	2008	08-616	12-30-08
11-05-09	12/31/09 - 12/30/10	2009	09-475	12-02-09

II. OAR 860-027-0300 Requirements:

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

a. Description

See the Deferral History above. For any tax year, the maximum Deferral Amount is \$2.25 million per year (\$21.1 million over ten years, after federal tax effect and using a Net-to-Gross Factor of 1.65%). For tax years during which PGE accrues less than the maximum provision of the ISFSI tax credit because anticipated state tax expense is less than \$2.1 million, PGE will calculate the Deferral Amount based on the actual ISFSI tax credit accrued.

PGE evaluates accrued (but as of yet unused) tax credits to determine if the credits could be expected to be used prior to the expiration of their carry-forward provisions. For ISFSI tax credits accrued (but not used) in 2008 and 2009, we assess that a portion of the accrued credits are not expected to be used before their 3-year carry-

forward provisions expire. As a result, PGE has reduced the regulatory liability representing the deferral of benefits at the end of third quarter 2010 by approximately \$1.1 million.

During the period between now and the end of the respective carry-forward periods, PGE will continue to assess our ability to use these credits. If PGE is able to use credits previously assessed as not likely to be used, we will again defer any such benefits into the deferred account.

b. Reasons for Deferral

PGE seeks approval of the Deferral Amount pursuant to ORS 757.259(2)(e). This deferral will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. PGE's customers have paid for the ISFSI project through an inclusion in rates of the annual contribution to the Trojan Nuclear Decommissioning Trust (NDT), and PGE has committed that customers should receive the benefits of these tax credits. The deferral of these credits allows them to be accumulated for later customer refund.

c. Proposed Accounting

PGE proposes to record the deferral as a regulatory liability in FERC Account 254 (Other Regulatory Liabilities), debiting FERC Account 407.3 (Regulatory Debits). In the absence of a renewed deferred accounting order, PGE's net income would increase as a result of lower state tax expense as booked in FERC Account 409.1 (Income Taxes, Utility Operating Income) when the ISFSI tax credits are utilized.

PGE will accrue interest, as appropriate, on the Deferral Amount at PGE's authorized cost of capital, currently 8.284% until the Commission approves amortization

of the deferred amount in a future proceeding.

d. Estimate of Amounts

For December 31, 2010, through December 30, 2011, PGE estimates adding approximately \$2.25 million to the deferred account if PGE earns adequate taxable income to use all the credits available.

The actual deferred amount may be more or less depending on PGE's state taxable income, actual tax expense and the provision for a three-year carry forward into future tax years.

e. Notice

A copy of the Notice of Application for Reauthorization to Defer ISFSI state tax credits and a list of persons served with the Notice are attached to the Application as Attachment A.

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

a. Description of Deferred Account Entries

Please see section (II)(c)

b. The Reason for Continuing Deferred Accounting

PGE is seeking approval to continue the ISFSI Deferral pursuant to conditions approved in Commission Order No. 09-475 (2009 tax year) as described in Section (II)(b) above.

IV. PGE Contacts:

The authorized addresses to receive notices and communications in reference to this

Application are:

Douglas C. Tingey
Assistant General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
Phone: (503) 464-8926
Facsimile: (503) 464-2200
doug.tingey@pgn.com

Patrick G. Hager
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon St., 1WTC0702
Portland, OR 97204
Phone: (503) 464-7857
Facsimile: (503) 464-7651
pge.opuc.filings@pgn.com

PGE waives paper service in this proceeding. In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

E-mail: Jay.Tinker@pgn.com


E-mail: Launa.Harmon@pgn.com

V. Conclusion:

For the reasons stated above, PGE requests permission to continue to defer ISFSI state tax credits from December 31, 2010 until December 30, 2011.

DATED this 12thth day of November, 2010.

Respectfully Submitted,



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

Attachment A

Notice of Application for Reauthorization
to Defer ISFSI State Tax Credits

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1186

In the Matter of the Application of Portland
General Electric Company for an Order to
Reauthorize the Deferral of ISFSI State Tax
Credits


Notice Of Application For Reauthorization
To Defer ISFSI State Tax Credits

On November 12, 2010, Portland General Electric Company ("PGE") filed an Application with the Oregon Public Utility Commission (the "Commission") for an Order reauthorizing deferral of ISFSI state tax credits. 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 should contact either of the following:

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1WTC-0702
Portland, OR 97204
(503) 464-7857 (telephone)
(503) 464-7651 (fax)
pge.opuc.filings@pge.com

Any person who wishes to submit written comments to the Commission on PGE's Application must do so no later than December 10, 2010.

Dated this 12th day of November, 2010.



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

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **NOTICE OF APPLICATION FOR REAUTHORIZATION TO ISFSI STATE TAX CREDITS** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived papers service.

Dated at Portland, Oregon, this 12th day of November, 2010.



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

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Summary Report**UE 197 PORTLAND GENERAL ELECTRIC****Category:** Electric Rate Case**Filed By:** PORTLAND GENERAL ELECTRIC

This filing requests a general rate revision.

Filing Date: 2/27/2008 **Advice No:** 08-02**Effective Date:** 1/1/2009 **Expiration Date:** 12/31/2008 **Status:** PERM SUSPEND**See also:** UE 198 08-23**Final Order:** 09-176 **Signed:** 2/27/2008**SERVICE LIST:**

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Summary Report

UE 197 PORTLAND GENERAL ELECTRIC

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