

December 22, 2011

Email / US Mail

Filing Center

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

Re:

UM 1294 PGE's Application for Reauthorization to Defer Annual Net Variable Power Cost Variance

Enclosed for filing are the original and five copies of Portland General Electric Company's Application for Reauthorization to Defer Annual Net Variable Power Cost Variance for January 1, 2012 through December 31, 2012.

PGE originally received permission to defer the annual difference between actual and forecasted net variable power costs pursuant to tariff Schedule 126 and Commission Order No. 07-050.

A Notice of Application regarding the filing of this application has been sent to those parties who have not waived paper service on the UE 215 and UM 1294 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.

Sincerely,

Patrick G. Hager

Manager, Regulatory Affairs

alex Tooman for

Encls.

cc: Bob Jenks, CUB

Melinda Davison, ICNU Ed Durrenberger, OPUC Carla Bird, OPUC

Service Lists: UE 215 and UM 1294

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### OF OREGON

#### UM 1294

In the Matter of the Application of Portland General Electric Company for Deferred Accounting of Annual Power Cost Variance

Application For Reauthorization To Defer Annual Net Variable Power Cost Variance

Pursuant to ORS 757.210, ORS 757.259, OAR 860-027-0300, OPUC Orders No. 07-015, 07-050, 08-154, 09-023, 09-505, 11-042, and PGE tariff Schedule 126, Portland General Electric Company ("PGE") requests reauthorization to defer for later ratemaking treatment certain annual net variable power cost variances ("PCV Deferral"). Schedule 125 is an "automatic adjustment clause" as defined in ORS 757.210. PGE requests that the reauthorization commence effective January 1, 2012 through December 31, 2012.

### I. Deferral History.

In Order 07-015, the Oregon Public Utility Commission (Commission) authorized the adoption of an Annual Power Cost Adjustment Mechanism ("PCAM") for PGE. PGE Schedule 126 contains the terms of the PCV Deferral. The PCV Deferral provides for recognition in rates of the difference, for a given year, between the actual net variable power costs incurred by PGE and the net variable power costs forecasted pursuant to PGE Schedule 125.

On January 17, 2007, PGE filed an application for authorization from the Commission to accrue, for future amortization, the 2007 difference between annual actual net variable power costs and the net variable power costs forecasted pursuant to tariff Schedule 125, in accordance with Order No. 07-015. This PCV Deferral is to capture the net variable power cost difference

that will be amortized in rates. The annual variance is determined pursuant to the terms of Schedule 126, which includes a Positive Annual Power Cost Dead band for positive annual variances, a Negative Annual Power Cost Dead band for negative annual variances, and an earnings test.

Pursuant to Commission order No. 10-478 (Docket UE 215), the power cost variance dead bands in PGE's Annual Power Cost Variance Mechanism tariff, Schedule 126, have been reset to a negative annual power cost dead band of \$15 million and a positive annual power cost dead band of \$30 million.

The PCV Deferral was authorized through OPUC Order No. 07-050 and the request to continue the PCAM deferral is filed pursuant to Orders 07-115, and 09-023, 09-505, 11-042 and ORS §757.210. The continuance of the deferral will minimize the frequency of rate changes or the fluctuation of rate levels, or match appropriately the costs borne and benefits received by customers.

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

Table 1 (\$ Millions)

Filing Date	Renewal Period	Order No.	Approval Date	PCV	Deferral for Amortization
01-16-08	1-17-08 / 1-16-09 (2008 PCAM)	08-154	03/04/08	\$16.1	\$0
12-19-08	1-01-09 / 12-31-09 (2009 PCAM)	09-023	1/27/09	\$0	\$0
12-01-09	1-01-10 / 12-31-10 (2010 PCAM)	09-505	12/28/09	\$0	\$0
12-15-10	1-01-11 / 12-31-11 (2011 PCAM)	11-042	1/28/11	TBD	TBD
12-22-11	1-1-12 / 12-31/12 (2012 PCAM)			TBD	TBD

## II. OAR 860-027-0300 Requirements

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

## a. <u>Description of Amounts</u>

See the Deferral History above. Amounts will be deferred pursuant to the terms of Schedule 126.

### b. Reasons for Deferral

PGE seeks reauthorization to defer annual net variable power cost variances from January 01, 2012 through December 31, 2012 ("Deferral Period 2012"). Without reauthorization, this deferral will expire on December 31, 2011. The continuance of the deferral will minimize the frequency of rate changes or the fluctuation of rate levels or match appropriately the costs borne and benefits received by customers.

## c. Proposed Accounting

PGE proposes to record the Deferred Amount in FERC Account 182.3 (Regulatory Assets); crediting FERC Account 555, Purchased Power, if there is an amount to collect from customers. PGE would record the Deferred Amount in FERC 229, Accumulated Provision for Rate Refunds; debiting FERC 449.1, Provision for Rate Refunds, if there is a refund to customers.

#### d. Estimate of Amounts

PGE cannot provide an estimate of the amount that will be deferred because it is dependent on actual 2012 information that is currently unknown, including the 2012 PCV and the earnings test required by Schedule 126. PGE requests that, in accordance with ORS 757.259(4), to accrue interest on the unamortized balance at a rate equal to its authorized weighted average cost of capital (currently set at 8.033% per Commission Order No. 10-478),

until amortization of any deferred amounts begin. Afterwards, interest will accrue at a rate to be determined pursuant to the methodology approved in Commission Order Nos. 08-263 and

09-065 (UM 1147).

e. Notice

A copy of the Notice of Application for Reauthorization to Defer Annual Net Variable

Power Cost Variances 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):

> Description of deferred account entries a.

Please see section (II)(a) and II(c) above.

b. The reason for continuing deferred accounting

PGE is seeking approval to continue the PCV Deferral pursuant to Commission Order

07-015, PGE tariff Schedule 126, Order No. 07-050, reauthorizing Orders 08-154, 09-023,

09-505, 11-042, and (II) (b) above.

IV. **PGE Contacts** 

The authorized addresses to receive notices and communications in respect of this

Application are:

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Manager, Rates & Regulatory Affairs

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E-mail: pge.opuc.filings@pgn.com

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

E-mail: Alex.Tooman@pgn.com

#### V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer annual net variable power cost variances from January 1, 2012 through December 31, 2012.

DATED: December 22<sup>nd</sup>, 2011.

Respectfully Submitted,

Patrick G. Hager

Manager, Regulatory Affairs

On Behalf of Portland General Electric Company

Tooman

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# Attachment A

## Notice of Application for Reauthorization to Defer Annual Net Variable Power Cost Variance

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

**UM 1294** 

In the Matter of the Application of Portland General Electric Company for Deferred Accounting of Annual Power Cost Variance

Notice Of Application For Reauthorization To Defer Annual Net Variable Power Cost Variance

On December 22, 2011, Portland General Electric Company ("PGE") filed an application with the Oregon Public Utility Commission (the "Commission") for an Order reauthorizing deferral of the annual net variable power cost variances pursuant to Order 07-015 and PGE tariff Schedule 126.

Approval of PGE's reauthorization 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 January 22, 2012.

Dated: December 22, 2011

Patrick G. Hager

Manager, Regulatory Affairs

On Behalf of Portland General Electric Company

Tooman

121 SW Salmon Street, 1WTC0702

Portland, Oregon 97204

Phone: 503.464.7857 patrick.hager@pgn.com

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing Notice Of Application For Reauthorization To Defer Annual Net Variable Power Cost Variance to be served to those parties whose e-mail addresses appear on the attached service lists, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service lists who have not waived paper service or who have been approved to receive hard copy service for OPUC Dockets No. UE 215 and UM 1294. These dockets are subject to waive paper rules in effect prior to OPUC Order 10-400, effective 10-14-10.

Dated at Portland, Oregon, December 22, 2011

Patrick G. Hager

Manager, Regulatory Affairs

On Behalf of Portland General Electric Company

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1WTC0702

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