



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

January 17, 2008

Email / US Mail

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

**Re: UM 1301 PGE's Application for Reauthorization of Deferral
of Quarterly Direct Access Open Enrollment Costs/Benefits**

Ms. Bailey-Goggins:

Enclosed for filing are the original and five copies of Portland General Electric Company's Application for Reauthorization of Deferral of Quarterly Direct Access Open Enrollment Costs/Benefits.

PGE originally requested authorization to defer the Quarterly Direct Access Open Enrollment Costs/Benefits pursuant to the Direct Access Stipulation adopted by the Commission in Orders No. 06-528 and 07-050. PGE subsequently received authorization pursuant to OPUC Order No. 07-108.

We have provided copies of a Notice of Application to the UE 180 service list. PGE continues to waive 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 at 503-464-7580.

Sincerely,

Patrick G. Hager
Manager, Regulatory Affairs

Encls.

cc: Carla Owings, OPUC
cc: Jason Eisdorfer, CUB
cc: Melinda Davison, ICNU
cc: UE 180 Service List

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1301

In the Matter of the Application of Portland
General Electric Company for an Order
Approving the Deferral of Quarterly Direct
Access Open Enrollment Costs/Benefits

Application for Reauthorization to Defer
Quarterly Direct Access Open Enrollment
Costs/Benefits

Pursuant to ORS 757.259 and OAR 860-027-0300, and OPUC Commission Order 07-108, Portland General Electric Company ("PGE") hereby requests reauthorization to defer for later ratemaking treatment certain costs or benefits associated with implementation of the quarterly direct access open enrollment windows from February 1, 2008 through January 31, 2009 ("Deferral Period 2008").

1. Deferral History.

On September 14, 2006, the Commission adopted the Direct Access Stipulation in Order No. 06-528 in consolidated OPUC Dockets UE 180 (Request for General Rate Revision), UE 181 (Annual Adjustments to Schedule 125 (2007 RVM Filing), and UE 184 (Request for a General Rate Revision related to the Port Westward Plant). PGE and parties entered into, and the Commission approved, a stipulation by which PGE would offer quarterly direct access enrollment windows in addition to its annual November election window. The stipulation was made a part of Order No. 07-015 and PGE filed tariff Schedule 128 in compliance with that Order. Under Schedule 128 the windows would provide eligible customers on a cost-of-service rate schedule the opportunity to move to direct access service or an applicable non-cost of service pricing option. An election by an eligible customer would be for the balance of the calendar year. The Balance-of-Year (quarterly) Transition Adjustment rates have been posted on PGE's website and filed with the OPUC as follows:

February 15th, or the next business day, for the April 1 (2nd Quarter) effective date of the election

May 15th, or the next business day, for the July 1 (3rd Quarter) effective date of the election

August 15th, or the next business day, for the October 1 (4th Quarter) effective date of the election

Each quarterly open enrollment window opened for not less than three full business days following the posting of the applicable transition adjustment rates. During these open enrollment windows, eligible customers have the option to choose a service option other than the cost-of-service energy supply. For each enrollment period for those customers electing to move from the cost-of-service option, PGE would continue to defer the difference between the value of the energy based on (1) the forward curves used to establish the quarterly balance-of-year Schedule 128 rate and (2) the actual sale of power by PGE's Power Operations Group.

PGE filed tariff Schedule 128 pursuant to the Stipulation in compliance with Order No. 07-015, on January 17, 2007, which provided for quarterly direct access windows in addition to the annual November election window PGE offered in the past. Customers on a cost-of-service rate schedule have the opportunity to move to direct access service or an applicable non-cost of service pricing option under the terms provided in Schedule 128. Amounts calculated pursuant to the description above will be deferred if the difference exceeds \$60,000 in any quarterly period, as specified in Schedule 128.

On February 1, 2007, PGE filed a request for approval to defer costs and benefits associated with its 2007 Quarterly Direct Access Open Enrollment Windows and pursuant to the Direct Access Stipulation referred to above. The deferral was authorized through OPUC Commission Order No. 07-108 and the request to continue the deferral is filed pursuant to Commission Orders No. 07-015, 07-108 and ORS §757.259.

II. OAR 860-027-0300 Requirements

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

a. Description of Amounts

The deferred amount for any given Deferral Period is a function of: changes in wholesale market prices between the posting of the quarterly open enrollment prices, the sale of power by PGE after the open enrollment period ends, and the amount of customer load that moves. To date, PGE has not deferred any amounts pursuant to the previous authorization in Order 07-108.

Since the deferred amount is dependent on changes in wholesale market prices that are not known in advance of the sale of power, as well as the amount of customer load that might move, PGE cannot provide an estimate of the deferred amount for Deferral Period 2008.

b. Reasons for Deferral

PGE seeks authorization to continue to defer costs or benefits incurred between February 1, 2008, and January 31, 2009. Any costs or benefits associated with the deferral will be considered later for appropriate rate-making treatment in an actual rate-making proceeding. PGE seeks reauthorization to defer costs associated with its Quarterly Direct Access Open Enrollment Costs or Benefits for the "Deferral Period 2008". Without reauthorization, this deferral will expire on January 31, 2008. The continuance of the deferral will minimize the frequency of rate changes or the fluctuation of rate levels or match appropriately the costs borne by and benefits received by customers. The deferral provides a mechanism for PGE to track the cost or benefit of open enrollment options and defer those costs or benefits for later rate-making treatment. PGE will seek amortization of any deferred amount in a later proceeding.

The continuation of the deferral will minimize the frequency of rate changes or fluctuations pursuant to ORS 757.259(2)(e).

Pursuant to Order No. 07-015, PGE expects any deferred amount to be recovered or

refunded in a manner approved by the Commission and consistent with the terms of Schedule 128.

c. Proposed Accounting

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets) with an off-setting credit to FERC Account 447 (Sales for Resale). In the absence of a deferral order, PGE would record the revenues associated with the deferred amount in FERC Account 447 (Sales for Resale).

d. Estimate of Amounts

See II (a) above.

PGE requests that, in accordance with ORS 757.259(4), it be allowed to continue to accrue interest on the unamortized balance at a rate equal to its authorized weighted average cost of capital, set at 8.29% in Commission Order 07-015.

e. Notice

A copy of the Notice of Application for Reauthorization to Defer Quarterly Direct Access Open Enrollment Costs or Benefits 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 sections (II)(a) and II(c) above.

b. The reason for continuing deferred accounting

PGE seeks approval to continue to defer costs associated with its Quarterly Direct Access Open Enrollment Costs or Benefits pursuant to conditions approved in Commission Order 07-108 as described in Section II (b) above from February 01, 2008 through January 31, 2009 ("Deferral Period 2008"). Without reauthorization, this deferral will expire on January 31, 2008.

IV. PGE Contacts

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

Application are:

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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:

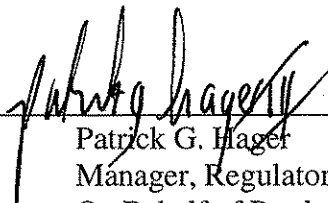
E-mail: Jay.Tinker@pgn.com

V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer certain Quarterly Direct Access Open Enrollment Costs or Benefits effective February 1, 2008 until January 31, 2009.

DATED this 17th of January, 2008.

Respectfully Submitted,



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

UM-1301
Attachment A

Notice of Application for Reauthorization to Defer
Quarterly Direct Access Open Enrollment Costs/Benefits

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1301

In the Matter of the Application of Portland
General Electric Company for an Order
Approving the Deferral of Quarterly Direct
Access Open Enrollment Costs/Benefits

Notice of Application for Reauthorization to
Defer Quarterly Direct Access Open
Enrollment Costs/Benefits

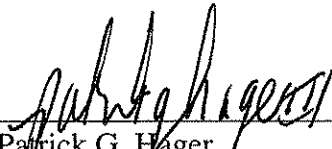
On January 17, 2008, Portland General Electric Company ("PGE") filed an application with the Oregon Public Utility Commission (the "Commission") for an Order reauthorizing deferral of quarterly direct access open enrollment costs or benefits pursuant to OPUC Order No. 07-015, PGE tariff Schedule 128, and OPUC Order 07-108.

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. PGE's application will be posted on the OPUC website for persons who wish to obtain a copy or they may contact the following:

Patrick G. Hager
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121 SW Salmon Street, 1 WTC 0702
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pge.opuc.filings@pgn.com

Any person who wishes to submit written comments to the Commission on PGE's application must do so no later than February 16, 2008.

Dated: January 17, 2008.



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 of Deferral of Quarterly Direct Access Open Enrollment Costs/Benefits ("Deferral Period 2008") 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, to those parties on the attached UE 180 Service List who have not waived paper service..

Dated at Portland, Oregon, this 17th day of January, 2008.



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

UE-180/UE-181/UE-184 Service List

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UE-180/UE-181/UE-184 Service List

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UE-180/UE-181/UE-184 Service List

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UE-180/UE-181/UE-184 Service List

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UE-180/UE-181/UE-184 Service List

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