



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

January 20, 2012

**Via Email and US Mail**

**OPUC Filing Center**  
Oregon Public Utility Commission  
550 Capitol Street NE, Ste 215  
Salem, OR 97301-2418

**RE: UM 1301 PGE's Application for Reauthorization to Defer Direct  
Access Open Enrollment Costs/Benefits**

Enclosed for filing are an original and five copies of Portland General Electric Company's (PGE) Application for Reauthorization to Defer Direct Access Open Enrollment Costs/Benefits.

PGE received authorization pursuant to OPUC Order Nos. 07-108, 08-153, 09-070, 10-075 and 11-058. In March 2008, a subsequent order (08-169) determined that the costs/benefits associated with PGE's Annual Direct Access Window are appropriately included in this deferral.

A notice of the 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 1301 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. 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: Carla Bird, OPUC  
Bob Jenks, CUB  
Melinda Davison, ICNU  
UM 1301 and UE 215 Service Lists

**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 Direct Access Open  
Enrollment Costs/Benefits**

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

Pursuant to ORS 757.259 and OAR 860-027-0300, and OPUC Commission Order Nos. 07-108, 08-153, 08-169, 09-070, 10-075, and 11-058, Portland General Electric Company (PGE) hereby requests reauthorization to defer for later ratemaking treatment certain costs or benefits associated with implementation of PGE's direct access open enrollment windows<sup>1</sup> from February 1, 2012, through January 31, 2013 ("Deferral Period 2012").

**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 provide eligible customers on a cost-of-service rate schedule the opportunity to move quarterly to direct access service or an applicable non-cost of service pricing option. An election by

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<sup>1</sup> The direct access windows include PGE's quarterly and annual open enrollment windows, as noted in OPUC Order No. 08-169 (UM-1359) and provided through PGE's Schedule 128.

an eligible customer is for the balance of the calendar year.

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 quarterly deferral was authorized through OPUC Commission Order No. 07-08 and the request to continue the deferral is filed pursuant to Commission Order Nos. 07-015, 07-108, and ORS §757.259. On March 17, 2008, the Commission determined that the costs/benefits associated with PGE's Annual Direct Access Window are appropriately included in this deferral, e.g. UM-1301. See Order No. 08-169 (Docket UM 1359).

The financial impact of customer decisions during the Quarterly and Annual Direct Access Windows is based on the amount of customer load that selects non-cost of service pricing and the changes in wholesale market prices used to set the transition adjustment rates (Schedule 128 rates) for each enrollment period. Amounts calculated pursuant to this mechanism will be deferred if the difference in market prices and the load leaving PGE's Cost of Service rate exceeds \$60,000 in any quarterly period or \$240,000 for the annual election as specified in Schedule 128.

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

**Table 1**

<b>Filing Date</b>	<b>Renewal Period</b>	<b>Order No.</b>	<b>Approval Date</b>
1/17/08	2/01/08 – 1/31/09	08-153	3/04/08
1/23/09	2/01/09 – 1/31/10	09-070	3/02/09
1/20/10	2/01/10 - 1/31/11	10-075	3/02/10
1/20/11	2/01/11 - 1/31/12	11-058	2/16/11

**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 the difference in wholesale market prices used to set transition adjustment rates (Schedule 128) for each open enrollment window, and the amount of customer load that selects non-cost of service energy pricing and supply. The current deferral balance is approximately \$1.1 million. PGE is proposing to amortize this \$1.1 million refund in 2012 in Advice Filing 11-32. PGE cannot provide an exact estimate of the deferred amount for Deferral Period 2012 until the outcome of the future quarterly windows is available.

b. Reasons for Deferral

PGE seeks authorization to continue to defer costs or benefits incurred between February 1, 2012, and January 31, 2013. 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 Direct Access Open Enrollment Costs or Benefits for the "Deferral Period 2012". Without reauthorization, this deferral will expire on January 31, 2012. The continuation of the deferral will minimize the frequency of rate changes or fluctuations pursuant to ORS 757.259(2)(e), 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.

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) or as a regulatory liability in FERC Account 254 (Other Regulatory Liabilities) with an off-setting debit to

FERC Account (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 8.033% in Commission Order No. 10-478 (UE-215), until amortization of any deferred amounts begins. Afterwards, interest will accrue at the interest rate set by the Commission for deferred amortizations.

e. Notice

A copy of the Notice of Application for Reauthorization to Defer 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 Direct Access Open Enrollment Costs or Benefits pursuant to conditions approved in Commission Order Nos. 07-108, 08-153, 08-169, 09-070, 10-075 and 11-058, as described in Section II (b) above from February 1, 2012 through January 31, 2013 ("Deferral Period 2012"). Without reauthorization, this deferral will expire on January 31, 2012.

**IV. PGE Contacts**

The authorized addresses to receive notices and communications in respect of 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  
Fax: 503.464.2000  
E-mail: doug.tingey@pgn.com

Patrick G. Hager  
Rates & Regulatory Affairs  
Portland General Electric,  
121 SW Salmon Street, 1 WTC0702  
Portland, OR 97204  
Phone: 503.464.7850  
Fax: 503.464.7651  
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:

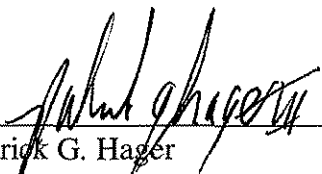
E-mail: Launa.Harmon@pgn.com

**V. Conclusion**

For the reasons stated above, PGE requests permission to continue to defer certain Direct Access Open Enrollment Costs or Benefits effective February 1, 2012, until January 31, 2013.

DATED this 20th of January, 2012.

Respectfully Submitted,

  
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Patrick G. Hager  
Manager, Regulatory Affairs  
On Behalf of Portland General Electric Company  
121 SW Salmon Street, 1 WTC 0702  
Portland, Oregon 97204  
Phone: 503.464.7580  
Fax: 503.464.7651  
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**UM-1301**  
**Attachment A**

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

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

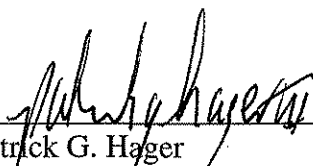
On January 20, 2011, Portland General Electric Company (PGE) filed an application with the Oregon Public Utility Commission (the "Commission") for an Order reauthorizing deferral of direct access open enrollment costs or benefits pursuant to OPUC Order No. 07-015, PGE tariff Schedule 128, and OPUC Order Nos. 07-108, 08-153, 08-169, 09-070, 10-075, and 11-058.

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 February 21, 2012.

Dated this 20<sup>th</sup> day of January 2011.

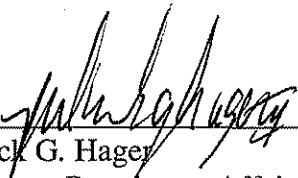
  
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Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1 WTC 0702  
Portland, Oregon 97204  
Phone: 503.464.7580  
Fax: 503.464.7651



## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an Application for Reauthorization to Defer Direct Access Open Enrollment Costs/ Benefits to be served by electronic mail on those parties whose email addresses appear on the attached service list and by U.S. Mail, First Class, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Dockets UM 1301/UE 215. These dockets are subject to waive paper rules in effect prior to OPUC Order 10-400, effective 10-14-10.

Dated at Portland, Oregon, January 20, 2012.



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**SERVICE LIST –  
OPUC DOCKET # UM 1301/UE-215**

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<p>Gregory M. Adams RICHARDSON &amp; O'LEARY, PLLC greg@richardsonandoleary.com (*Waived Paper Service)</p>	<p>Peter J. Richardson RICHARDSON &amp; O'LEARY, PLLC peter@richardsonandoleary.com (*Waived Paper Service)</p>
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**SERVICE LIST  
OPUC DOCKET # UM 1301**

<p>Carla Bird PUBLIC UTILITY COMMISSION OF OREGON PO Box 2148 Salem, OR 97308 carla.bird@state.or.us</p>	
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