



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

January 28, 2013

**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 No. 12-064. 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: Deborah Garcia, 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 No. 12-064, 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, 2013, through December 31, 2013 ("Deferral Period 2013"). This 11-month reauthorization will allow for the next reauthorization request to be on a calendar year basis and therefore consistent with the provisions of Schedule 128.

**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

---

<sup>1</sup> The direct access windows include PGE's annual and balance-of-year open enrollment window provided through PGE's Schedule 128.

made a part of Order No. 07-015 and PGE filed tariff Schedule 128 in compliance with that Order.

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).

On February 23, 2012, the Commission approved a stipulation in Docket UE 236 (Order No. 12-057) that reduced the quarterly windows to one, effective April 1 of each year. The balance-of-year window now provides Schedule 128 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, for the balance of the calendar year.

The financial impact of customer decisions during the balance-of-year 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 the balance-of-year 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

Filing Date	Renewal Period	Order No.	Approval Date
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
1/20/12	2/01/12 - 1/31/13	12-064	2/28/12

**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 \$600,000 associated with the annual November enrollment window. PGE will amortize this \$600,000 refund in 2013 through Schedule 105. PGE cannot provide an estimate of the deferred amount for Deferral Period 2013 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, 2013, and December 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 2013". Without reauthorization, this deferral will expire on January 31, 2013. 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, 11-058 and 12-064, as described in Section II(b) above from February 1, 2013 through December 31, 2013 ("Deferral Period 2013"). Without reauthorization, this deferral will expire on January 31, 2013.

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 Company  
121 SW Salmon Street, 1WTC0702  
Portland, OR 97204  
Phone: 503.464.7857  
Fax: 503.464.7651  
Email: 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, 2013, until December 31, 2013.

DATED: January 28, 2012.

Respectfully Submitted,



---

Patrick G. Hager  
Manager, Regulatory Affairs  
On Behalf of Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, Oregon 97204  
Phone: 503.464.7857  
Fax: 503.464.7651  
E-Mail: patrick.hager@pgn.com

**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**

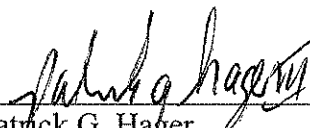
On January 28, 2013, Portland General Electric Company (PGE) filed an application with the Oregon Public Utility Commission (the "Commission") for an Order reauthorizing deferral of direct access open enrollment costs or benefits pursuant to OPUC Order No. 07-015, PGE tariff Schedule 128, and OPUC Order Nos. 07-108, 08-153, 08-169, 09-070, 10-075, 11-058, and 12-064.

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 28, 2013.

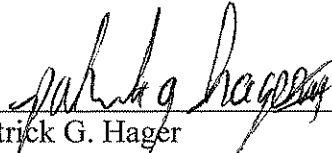
Dated this 28<sup>th</sup> day of January 2013.

  
\_\_\_\_\_  
Patrick G. Hager  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, Oregon 97204  
Phone: 503.464.7857  
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: January 28, 2013.



---

Patrick G. Hager  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon, 1WTC0702  
Portland, OR 97204  
Telephone: 503.464.7857  
Fax: 503.464.7651  
E-Mail: patrick.hager@pgn.com

um-1301\_pge reauth app-notice-cos\_01.28.13.docx

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

Heather Rode heatherrode@gmail.com (*Waived Paper Service)	Kurt J. Boehm, Attorney BOEHM KURTZ & LOWRY kboehm@bklawfirm.com (*Waived Paper Service)
Robert Jenks CITIZEN'S UTILITY BOARD OF OREGON bob@oregoncub.org (*Waived Paper Service)	Gordon Feighner CITIZENS' UTILITY BOARD OF OREGON gordon@oregoncub.org (*Waived Paper Service)
Kevin Elliott Parks CITIZENS' UTILITY BOARD OF OREGON kevin@oregoncub.org (*Waived Paper Service)	G. Catriona McCracken CITIZEN'S UTILITY BOARD OF OREGON catriona@oregoncub.org (*Waived Paper Service)
Raymond Myers CITIZEN'S UTILITY BOARD OF OREGON ray@oregoncub.org (*Waived Paper Service)	Benjamin Walters, Deputy City Attorney CITY OF PORTLAND bwalters@ci.portland.or.us (*Waived Paper Service)
David Tooze CITY OF PORTLAND – PLANNING & SUSTAINABILITY dtooze@ci.portland.or.us (*Waived Paper Service)	Jess Kincaid, Energy Partnership Coordinator COMMUNITY ACTION PARTNERSHIP OF OREGON jess@caporegon.org (*Waived Paper Service)
S. Bradley Van Cleve DAVISON VAN CLEVE 333 SW Taylor, Suite 400 Portland, OR 97204 mail@dvclaw.com	Stephanie S. Andrus, Assistant AG DEPARTMENT OF JUSTICE 1162 Court Street, NE Salem, OR 97301-4096 stephanie.andrus@state.or.us
Kevin Higgins, Principal ENERGY STRATEGIES, LLC khiggins@energystrat.com (*Waived Paper Service)	Nona Soltero, Corporate Law Department #23C FRED MEYER STORES/KROGER nona.soltero@fredmeyer.com (*Waived Paper Service)
Marcy Putnam, Political Affairs & Communication Representatives IBEW LOCAL 125 17200 NE Sacramento Street Portland, OR 97230 marcy@ibew125.com	Greg Bass SEMPRA ENERGY SOLUTIONS, LLC gbass@semprasolutions.com (*Waived Paper Service)
Lon L. Peters NW ECONOMIC RESEARCH, INC. lon@nw-econ.com (*Waived Paper Service)	Jordan A. White, Senior Counsel PACIFIC POWER & LIGHT jordan.white@pacificorp.com (*Waived Paper Service)
Oregon Dockets PACIFICORP, dba PACIFIC POWER & LIGHT oregondockets@pacificorp.com (*Waived Paper Service)	Judy Johnson Oregon Public Utility Commission PO Box 2148 Salem, OR 97308-2148 judy.johnson@state.or.us

<p>Carla Bird  Oregon Public Utility Commission  PO Box 214  Salem, OR 97308-2148  carla.bird@state.or.us</p>	<p>Randall J. Falkenberg  RFI CONSULTING, INC.  PMB 362  8343 Roswell Road  Sandy Springs, GA 30350  consultrfi@aol.com</p>
<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>
<p>James Benya  THE INTERNATIONAL DARK SKY  ASSOCIATION  jbenya@benyalighting.com  (*Waived Paper Service)</p>	<p>Leo Smith  THE INTERNATIONAL DARK SKY  ASSOCIATION  leo@smith.net  (*Waived Paper Service)</p>