



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

January 20, 2010

Via Email and US Mail

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

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

Enclosed for filing are an original and one copy of Portland General Electric Company's (PGE) Application for Reauthorization of Deferral of 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 Order Nos. 06-528 and 07-050. PGE subsequently received authorization pursuant to OPUC Order Nos. 07-108, 08-153, and 09-070. 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.

We have provided copies of a Notice of Application for Reauthorization of Deferral to the UE 197 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. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

Patrick G. Hager
Manager, Regulatory Affairs

Encls.

cc: Carla Owings, OPUC
Bob Jenks, CUB
Melinda Davison, ICNU
UE 197 Service List [notice only]

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 and 09-070, 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 windows¹ from February 1, 2010, through January 31, 2011 ("Deferral Period 2010").

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 an

¹ 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.

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.

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

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

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 \$1.3 million. PGE will refund this amount to eligible customers at later date determined by the Commission. This amount may change based on the outcome of the three future quarterly direct access windows. PGE cannot provide an exact estimate of the deferred amount for Deferral Period 2010 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, 2010, and January 31, 2011. 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 2010". Without reauthorization, this deferral will expire on January 31, 2010. 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). 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 8.284% in Commission Order No. 08-601 (UE-197), until amortization of any deferred amounts begins. Afterwards, interest will accrue at the interest rate approved in OPUC Order No. 08-371².

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

² The OPUC Commission approved a Blended Treasury Rate of 2.05 percent (by letter dated January 23, 2009), to be applied to all deferred accounts for which the Commission grants amortization approval. See Docket UM-1147.

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, and 08-169 as described in Section II (b) above from February 1, 2010 through January 31, 2011 ("Deferral Period 2010"). Without reauthorization, this deferral will expire on January 31, 2010.

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) 464.7857
Fax: (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: Marc.Cody@pgn.com
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, 2010, until January 31, 2011.

DATED this 20th of January, 2010

Respectfully Submitted,



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

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**

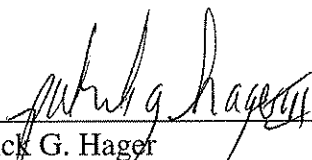
On January 20, 2010, Portland General Electric Company (PGE) filed an application with the Oregon Public Utility Commission (the "Commission") for an Order reauthorizing deferral of direct access open enrollment costs or benefits pursuant to OPUC Order No. 07-015, PGE tariff Schedule 128, and OPUC Order Nos. 07-108, 08-153, 08-169 and 09-070.

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
Manager, Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street, 1 WTC 0702
Portland, Oregon 97204
Phone: 503-464-7580
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 20, 2010.

Dated: January 20, 2010.

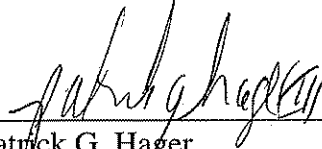


Patrick G. Hager
Manager, Regulatory Affairs
Portland General Electric Company

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing Notice of Application for Reauthorization of Deferral of Direct Access Open Enrollment Costs/Benefits ("Deferral Period 2010") to be served by electronic mail to those parties who e-mail addresses appear on the attached service list, and by First Class US Mail, postage prepaid and property addressed, to those parties on the attached UE 197 Service List who have not waived paper service.

Dated at Portland, Oregon, this 20th day of January, 2010.



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

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:**

COMMUNITY ACTION PARTNERSHIP OF OREGON
PO BOX 7964
SALEM OR 97301

KURT J BOEHM -- CONFIDENTIAL
BOEHM KURTZ & LOWRY
36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202

ROGER D. COLTON -- CONFIDENTIAL
FISHER SHEEHAN & COLTON
34 WARWICK RD
BELMONT MA 02478

JOAN COTE -- CONFIDENTIAL
OREGON ENERGY COORDINATORS ASSOCIATION
2585 STATE ST NE
SALEM OR 97301

JIM DEASON -- CONFIDENTIAL
ATTORNEY AT LAW
1 SW COLUMBIA ST, SUITE 1600
PORTLAND OR 97258-2014

OPUC DOCKETS
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205

ROBERT JENKS -- CONFIDENTIAL
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205

JUDY JOHNSON -- CONFIDENTIAL
PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM OR 97308-2148

JASON W JONES -- CONFIDENTIAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096

MICHAEL L KURTZ -- CONFIDENTIAL
BOEHM KURTZ & LOWRY
36 E 7TH ST STE 1510
CINCINNATI OH 45202-4454

G. CATRIONA MCCrackEN -- CONFIDENTIAL
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY - STE 308
PORTLAND OR 97205

RATES & REGULATORY AFFAIRS - OPUC FILINGS --
CONFIDENTIAL
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST 1WTC-0702
PORTLAND OR 97204

KIP PHEIL -- CONFIDENTIAL
*OREGON DEPARTMENT OF ENERGY
625 MARION ST NE - STE 1
SALEM OR 97301-3737

JANET L PREWITT -- CONFIDENTIAL
*DEPARTMENT OF JUSTICE
NATURAL RESOURCES SECTION
1162 COURT ST NE
SALEM OR 97301-4096

Summary Report

UE 197 PORTLAND GENERAL ELECTRIC

VIJAY A SATYAL
*OREGON DEPARTMENT OF ENERGY
625 MARION ST NE
SALEM OR 97301

DOUGLAS C TINGEY -- CONFIDENTIAL
PORTLAND GENERAL ELECTRIC
121 SW SALMON 1WTC13
PORTLAND OR 97204

S BRADLEY VAN CLEVE -- CONFIDENTIAL
DAVISON VAN CLEVE PC
333 SW TAYLOR - STE 400
PORTLAND OR 97204

MICHAEL T WEIRICH -- CONFIDENTIAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096

SCOTT WINKELS -- CONFIDENTIAL
LEAGUE OF OREGON CITIES
PO BOX 928
SALEM OR 97308