



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204  
portlandgeneral.com

December 28, 2023

*Via email*

Public Utility Commission of Oregon  
Attention: Filing Center  
P. O. Box 1088  
Salem, OR 97308-1088

**RE: UM 1301 Portland General Electric Company Application for Deferral of 2007  
Quarterly Direct Access Open Enrollment Costs/Benefits**

Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Direct Access Open Enrollment Costs/Benefit.

A notice regarding the filing of this application has been sent to the parties on the UE 416 and UM 1301 service lists.

Parties who wish to receive a copy of this Application should review the Public Utility Commission of Oregon (OPUC) website.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488. 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,

*/s/ Jaki Ferchland*

Jaki Ferchland  
Senior Manager, Revenue Requirement

JF/dm  
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1301**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Application for Deferral of Direct Access Open  
Enrollment Costs/Benefits

**PORTLAND GENERAL ELECTRIC  
COMPANY APPLICATION FOR  
DEFERRAL REAUTHORIZATION**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (PGE) hereby requests a Public Utility Commission of Oregon (Commission or OPUC) order reauthorizing PGE to continue 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 January 1, 2024, through December 31, 2024 (Deferral Period).

**I. Deferral History**

On September 14, 2006, the Commission adopted the Direct Access Stipulation in Order No. 06-528. PGE and parties entered into 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 Commission 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 pursuant to the Commission Orders referenced above. The quarterly deferral was authorized by Commission Order No. 07-108.

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

Then, on March 17, 2008, the Commission determined that the costs and benefits associated with PGE's Annual Direct Access Window are appropriately included within the Docket UM 1301 deferral (see Commission Order No. 08-169 in Docket UM 1359).

On February 23, 2012, Commission Order No. 12-057 (Docket No. UE 236) reduced the quarterly windows to one, effective April 1 of each year. The balance-of-year window now provides Schedule 128-eligible customers the opportunity to move 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 numerous reauthorizations for this deferral, as shown in Table 1 below:

**Table 1**

<b>Filing Date</b>	<b>Renewal Period</b>	<b>Order No.</b>
1/17/08	2/01/08 – 1/31/09	08-153
1/23/09	2/01/09 – 1/31/10	09-070
1/20/10	2/01/10 - 1/31/11	10-075
1/20/11	2/01/11 – 1/31/12	11-058
1/20/12	2/01/12 - 1/31/13	12-064
1/28/13	2/01/13 – 12/31/13	13-082
12/20/13	1/01/14 – 12/31/14	14-022
12/22/14	1/01/15 – 12/31/15	15-023
12/18/15	1/01/16 – 12/31/16	16-038
12/01/16	1/01/17 – 12/31/17	17-109
12/04/17	1/01/18 – 12/31/18	18-034
11/14/18	1/01/19 – 12/31/19	19-045
11/30/19	1/01/20 – 12/31/20	20-032
12/29/20	1/01/21 – 12/31/21	21-034
12/29/21	1/01/22 – 12/31/22	22-034
12/30/22	1/01/23-12/31/23	Pending

**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 direct access enrollment window, and the amount of customer load that selects non-cost of service energy pricing and supply. The current deferral balance is approximately (\$800,000) associated with the 2022 annual November enrollment window. PGE will set the amortization schedule for this amount during 2024 through Schedule 105. PGE cannot provide an estimate of the deferred amount for Deferral Period 2024 until the results of the applicable direct access windows are available.

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks continued deferred accounting treatment for the costs and benefits associated with direct access open enrollment windows incurred from January 1, 2024 through December 31, 2024. Any costs or benefits associated with the deferral will be considered later for appropriate rate-making treatment. Without reauthorization, this deferral will expire on December 31, 2023. Granting this Application will minimize the frequency of rate changes or fluctuations and match appropriately the costs borne by and benefits received by customers.

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 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. Subsequently, interest will accrue at the modified blend treasury rate set by the Commission for the amortization of deferred accounts.

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 this 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 the costs or benefits associated with its Direct Access Open Enrollment Costs from January 1, 2024 through December 31, 2024. Without reauthorization, this deferral will expire on December 31, 2023.

**IV. PGE Contacts**

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

Kim Burton  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street  
Portland OR 97204  
(573) 356-9688  
kim.burton@pgn.com

PGE-OPUC Filings  
Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street  
Portland OR 97204  
(503) 464-8172  
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:

Jaki Ferchland  
Email:

Senior Manager, Revenue Requirement  
jacquelyn.ferchland@pgn.com

**V. Summary of Filing Conditions**

A. Earnings Review

An earnings review should not be required, because, as stated in the OPUC Staff Memo

for PGE Advice No. 13-24, which the Commission approved at the December 19, 2013 OPUC Public Meeting, the deferred costs are of the sort that should be borne by customers.

B. Prudence Review

A prudence review will be performed by the OPUC Staff and should include a verification of the accounting methodology used to determine the final amortization balance.

C. Sharing

All costs should flow to customers per the Staff Memo described in part V(A) above.

D. Rate Spread/Rate Design

The amortization of any deferred amount will be spread on a per-kWh basis to applicable Large Nonresidential customers as specified in Schedule 128.

E. Three Percent Test (ORS 757.259(6))

The amortization of the deferred costs will be subject to the three percent test in accordance with the ORS 757.259(6) and (8), which limits aggregated deferral amortizations during any one year to no more than three percent of the utility's gross revenues for the preceding calendar year.

**VI. Conclusion**

For the reasons stated above, PGE requests permission to continue to defer certain Direct Access Open Enrollment Costs or Benefits effective January 1, 2024 through December 31, 2024.

DATED this 28th day of December 2023.

*/s/ Jaki Ferchland*

Jaki Ferchland  
Senior Manager, Revenue Requirement  
Portland General Electric Company  
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Portland OR 97204  
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## **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

PORTLAND GENERAL ELECTRIC  
COMPANY

Application for Deferral of Direct Access Open  
Enrollment Costs/Benefits

**PORTLAND GENERAL ELECTRIC  
COMPANY NOTICE OF  
APPLICATION FOR DEFERRAL  
REAUTHORIZATION**

On December 29, 2023, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (Commission) for an Order reauthorizing deferral of direct access open enrollment costs or benefits pursuant to Order Nos. 07-015 and 22-034, and PGE Schedule 128.

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 Commission website.

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than January 24, 2024.

Dated this 29th day of December 2023.

*/s/ Jaki Ferchland*

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Senior Manager, Revenue Requirement  
Portland General Electric Company  
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Portland OR 97204  
(503) 464-7488  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **Notice of Application for Reauthorization to Defer Direct Access Open Enrollment Costs/Benefits** to be served by electronic mail to those parties whose email addresses appear on the attached service lists for Docket No. UE 416 and UM 1301.

DATED at Portland, Oregon, this 28th day of December 2023.

*/s/ Jaki Ferchland*

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