



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

May 6, 2021

Via Electronic Filing

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

Re: UM 1482 Application for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot

Dear Filing Center:

Enclosed for filing is the Application of Portland General Electric Company (PGE) for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot (PV VIR Pilot). Per OAR 860-027-0300(2), the authorized deferral expires 12 months from the date authorization becomes effective.

PGE hereby requests continued reauthorization of the PV VIR Pilot deferral for the period May 7, 2021 through May 6, 2022.

A Notice of Application regarding the filing of this application is attached. We have provided notification to the UM 1482 and UE 335 service lists. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Should you have questions or comments regarding this filing, please contact me at (503) 464-7488.

Sincerely,

/s/ Alex Tooman for *Jaki Ferchland*
Jaki Ferchland
Manager, Revenue Requirement

JF/np
Enclosure
cc: UM 1482 and UE 335 Service Lists

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1482

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Expenses
Associated with a Photovoltaic Volumetric
Incentive Rate Pilot.

**APPLICATION FOR DEFERRAL
REAUTHORIZATION**

Pursuant to ORS 757.259, ORS 757.365, ORS 469A.120, ORS 757.210, OAR 860-027-0300, OAR 860-084-0380, and OAR 860-084-0390, Portland General Electric Company (“PGE”) Schedule 137 is an automatic adjustment clause (“AAC”) for costs related to PGE’s Photovoltaic Volumetric Incentive Rate Pilot (“PV VIR Pilot” or “Pilot”). Oregon Revised Statute 757.365(10) allows for the recovery of all prudently incurred PV VIR costs in rates. As necessary to enable cost recovery under the AAC, PGE hereby requests authorization to continue an AAC deferral pursuant to Public Utility Commission of Oregon (the “Commission” or “OPUC”) Order Nos. 19-283 and 20-195. PGE requests this reauthorization to be effective May 7, 2021 through May 6, 2022.

I. Deferral History:

Under Docket No. AR 538, the Commission promulgated its Division 84 rules for the PV VIR Pilot. Docket UM No. 1452 set forth additional implementation requirements through OPUC Orders detailed below, the most recent being Order Nos. 19-283 and 20-195. The Pilot, required by state law, provides payments to retail electric customers for electricity generated by permanently installed solar photovoltaic energy systems through PGE Schedules 215, 216, and 217. This deferral allows PGE to recover costs associated with the Pilot, through an AAC under

PGE Schedule 137, Customer Owned Solar Payment Option Cost Recovery Mechanism.

PGE has received reauthorization for this deferral since 2011, as shown in Table 1 below:

Table 1: UM 1482 Commission Authorization

Order No.	Approval Date
11-059	2/16/2011
11-281	8/01/2011
12-202	5/07/2012
13-250	7/02/2013
14-271	7/22/2014
15-185	06/09/2015
17-304	06/10/2017
18-259	07/03/2018
19-283	8/29/2019
20-195	6/18/2020

II. OAR 860-027-0300 Requirement (3):

a. Description of Utility Expense for which deferred accounting is requested.

The incremental utility expenses consist of volumetric incentive payments and/or retail bill offsets to participants, administrative costs associated with the PV VIR Pilot operations, data collection, development costs for billing and website, customer surveys, and regulatory reporting requirements. Credits to the associated balancing account include deposit forfeitures, interconnection application fees, customer charges, assignment fees, and the avoided energy value. Amounts in the balancing account accrue interest at the Commission-authorized rate of return for deferred accounts.

b. Reasons for Deferral

PGE seeks deferral reauthorization for the reasons stated in Section I, above.

c. Proposed accounting for recording amounts deferred

PGE proposes no changes in the established accounting for the deferred amount.

d. Estimate of Amounts to be recorded for the next 12 months.

The amounts to be deferred consist of incremental costs of the Pilot for: 1) VIR payments to participants including any retail electricity service bill offset amounts; and 2) program costs incurred to implement and administer the requirements for the Pilot as described in Section II (a) above. For both cost categories, the amounts deferred depend upon actual participation levels and PV system sizes of participants in the Pilot. PGE estimates incremental costs may range from \$7.0 million to \$8.0 million for the deferral period, May 7, 2021 through May 6, 2022, consisting largely of VIR payments to participants.

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with the notice are provided as Attachment A (OAR 860-027-0300[6]).

III. OAR 860-027-0300 Requirement (4), Reauthorization:

a. Description of deferred accounting entries

See II c., above.

b. The reason for continuing the deferred account

PGE seeks approval to continue to defer incremental costs associated with the Pilot not currently in rates. The granting of this reauthorization request will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. This deferral should be continued and is warranted because ORS 757.365 requires PGE to offer the Pilot and thus incur the costs to implement and operate the Pilot. PGE requests an effective date of May 7, 2021 through May 6, 2022, as the deferral reauthorization period.

IV. PGE Contacts:

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

Douglas C. Tingey
Associate General Counsel
Portland General Electric
121 SW Salmon Street 1WTC1301
Portland, OR 97204
Phone: 503.464.8926
E-mail: doug.tingey@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric
121 SW Salmon Street 1WTC0306
Portland, OR 97204
Phone: 503.464.7805
E-mail: 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
Manager, Revenue Requirement
Email: Jacquelyn.Ferchland@pgn.com

V. Summary of Filing Conditions:

Information related to future amortization is listed below:

- a. Earnings Review: PGE Schedule 137 recovers costs associated with the Solar Payment Option Pilot not otherwise included in rates. Because this schedule is an AAC as provided under ORS 469A.120 and defined in the Renewable Portfolio Standards, ORS 757.210, an earnings review is not applicable to this deferral. See also PGE Schedules 215, 216, and 217.
- b. Prudence Review: Staff may review deferred costs as appropriate.
- c. Sharing (Percent): All prudently incurred costs are to be recoverable by PGE with no sharing mechanism.
- d. Spread/Rate Design: In Docket No. UE 237, Commission Staff and parties agreed that PGE Schedule 137 costs should be allocated to each schedule (all customer classes) based on an equal percent of generation revenue applied on a cents per kilowatt-hour basis.
- e. Three Percent test: The amortization of the deferred costs will be subject to the three percent test in accordance with ORS 757.259(7) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

VI. Conclusion.

For the reasons stated above, and as necessary to enable cost recovery under an AAC, PGE requests permission to continue to defer expenses associated with the Solar Payment Option Pilot effective May 7, 2021, through May 6, 2022.

DATED May 6, 2021.

/s/ Alex Tooman for *Jaki Ferchland*
Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: pge.opuc.filings@pgn.com

UM 1482

Attachment A

**Notice of Application for Reauthorization to Defer Expenses
Associated with a Photovoltaic Volumetric Incentive Rate Pilot,
Aka, the Solar Payment Option Pilot**

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1482**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral of Expenses
Associated with a Photovoltaic Volumetric
Incentive Rate Pilot.

**NOTICE OF APPLICATION FOR
DEFERRAL REAUTHORIZATION**

On May 6, 2021, Portland General Electric Company (“PGE”) filed an application with the Public Utility Commission of Oregon (the “Commission”) for an Order reauthorizing deferral of certain expenses associated with a Photovoltaic Volumetric Incentive Rate Pilot, also known as PGE Solar Payment Option Pilot.

Approval of PGE’s Application will continue to support the use of an automatic adjustment clause rate schedule, which will provide for changes in rates reflecting incremental costs associated with the pilot.

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 June 6, 2021.

DATED this 6th day of May, 2021.

/s/ Alex Tooman for *Jaki Ferchland*
Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: pgc.opuc.filings@pgn.com

UM 1482

Attachment B

**Solar Payment Option
Deferral Amounts and Program Cost**

Electronic File UM 1482

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the UM 1482 **Notice of Application for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, aka PGE Solar Payment Option Pilot** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service lists in UM 1482 and UE 335.

DATED at Portland, Oregon, this 6th day of May 2021.

/s/ Alex Tooman for *Jaki Ferchland*
Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503-464-7488
E-Mail: pge.opuc.filings@pgn.com

UM 1482 SERVICE LIST

OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
STEPHANIE S ANDRUS PUC STAFF--DEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
PGE RATES & REGULATORY AFFAIRS	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com
ROBERT JENKS OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
MITCH MOORE PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 mitch.moore@state.or.us
BRADLEY MULLINS MOUNTAIN WEST ANALYTICS	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 brmullins@mwanalytics.com
TYLER C PEPPE DAVISON VAN CLEVE, PC	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com
WENDY SIMONS OREGON DEPARTMENT OF ENERGY	550 CAPITOL ST NE 1ST FL SALEM OR 97301 wendy.simons@oregon.gov
DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC	121 SW SALMON 1WTC1301 PORTLAND OR 97204 doug.tingey@pgn.com
JAKI FERCHLAND PORTLAND GENERAL ELECTRIC	121 SW SALMON ST 1WTC-0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com Jacquelyn.ferchland@pgn.com

UE 335 SERVICE LIST

ROBERT D KAHN
NORTHWEST & INTERMOUNTAIN POWER
PRODUCERS COALITION

PO BOX 504
MERCER ISLAND WA 98040
rkahn@nippc.org

ALBERTSONS

BRIAN BETHKE
11555 DUBLIN CANYON ROAD

250 PARKCENTER BLVD
BOISE ID 83706
brian.bethke@albertsons.com

CHRIS ISHIZU
ALBERTSONS COMPANIES, INC.

250 PARKCENTER BLVD
BOISE ID 83706
chris.ishizu@albertsons.com

GEORGE WAIDELICH
ALBERTSONS COMPANIES' INC.

11555 DUBLIN CANYON ROAD
PLEASANTON OR 94588
george.waidelich@albertsons.com

AWEC UE 335

BRADLEY MULLINS **(C)**
MOUNTAIN WEST ANALYTICS

1750 SW HARBOR WAY STE 450
PORTLAND OR 97201
brmullins@mwanalytics.com

TYLER C PEPPE **(C)**
DAVISON VAN CLEVE, PC

1750 SW HARBOR WAY STE 450
PORTLAND OR 97201
tcp@dvclaw.com

ROBERT SWEETIN **(C)**
DAVISON VAN CLEVE, P.C.

185 E. RENO AVE, SUITE B8C
LAS VEGAS NV 89119
rds@dvclaw.com

CALPINE SOLUTIONS

GREGORY M. ADAMS **(C)**
RICHARDSON ADAMS, PLLC

PO BOX 7218
BOISE ID 83702
greg@richardsonadams.com

GREG BASS
CALPINE ENERGY SOLUTIONS, LLC

401 WEST A ST, STE 500
SAN DIEGO CA 92101
greg.bass@calpinesolutions.com

KEVIN HIGGINS **(C)**
ENERGY STRATEGIES LLC

215 STATE ST - STE 200
SALT LAKE CITY UT 84111-2322
khiggins@energystat.com

FRED MEYER

KURT J BOEHM **(C)**
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

JODY KYLER COHN **(C)**
BOEHM, KURTZ & LOWRY

36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkylercohn@bkllawfirm.com

NIPPC

JONI L SLIGER
SANGER LAW PC

1041 SE 58th PLACE
PORTLAND OR 97215
joni@sanger-law.com

IRION A SANGER (C)
SANGER LAW PC

1041 SE 58th PLACE
PORTLAND OR 97215
irion@sanger-law.com

SPENCER GRAY
NIPPC

sgray@nippc.org

OREGON CITIZENS UTILITY BOARD

OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

MICHAEL GOETZ (C)
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97205
mike@oregoncub.org

ROBERT JENKS (C)
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
bob@oregoncub.org

PACIFICORP

PACIFICORP, DBA PACIFIC POWER

825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
oregondockets@pacificcorp.com

MATTHEW MCVEE
PACIFICORP

825 NE MULTNOMAH
PORTLAND OR 97232
matthew.mcvee@pacificcorp.com

PORTLAND GENERAL ELECTRIC

PGE RATES & REGULATORY AFFAIRS

PORTLAND GENERAL ELECTRIC COMPANY
121 SW SALMON STREET, 1WTC0306
PORTLAND OR 97204
pge.opuc.filings@pgn.com

JAKI FERCHLAND
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST. 1WTC0306
PORTLAND OR 97204
jacquelyn.ferchland@pgn.com

DOUGLAS C TINGEY (C)
PORTLAND GENERAL ELECTRIC

121 SW SALMON 1WTC1301
PORTLAND OR 97204
doug.tingey@pgn.com

SBUA

JAMES BIRKELUND
SMALL BUSINESS UTILITY ADVOCATES

548 MARKET ST STE 11200
SAN FRANCISCO CA 94104
james@utilityadvocates.org

DIANE HENKELS (C)
CLEANTECH LAW PARTNERS PC

420 SW WASHINGTON ST STE 400
PORTLAND OR 97204
dhenkels@actionnet.net

STAFF

STEPHANIE S ANDRUS (C)
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

MARIANNE GARDNER (C)
PUBLIC UTILITY COMMISSION OF OREGON

PO BOX 1088
SALEM OR 97308-1088
marianne.gardner@state.or.us

SOMMER MOSER (C)
PUC STAFF - DEPARTMENT OF JUSTICE

1162 COURT ST NE
SALEM OR 97301
sommer.moser@doj.state.or.us

WALMART

VICKI M BALDWIN (C)
PARSONS BEHLE & LATIMER

201 S MAIN ST STE 1800
SALT LAKE CITY UT 84111
vbaldwin@parsonsbehle.com

STEVE W CHRISS (C)
WAL-MART STORES, INC.

2001 SE 10TH ST
BENTONVILLE AR 72716-0550
stephen.chriss@wal-mart.com