



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

May 13, 2019

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Ste. 100
P.O. Box 1088
Salem OR 97308-1088

Re: UM 1938 - Clarification of Deferral Request

We write this letter after recently consulting with Staff. In the interest of moving Portland General Electric Company's (PGE) deferral request to the Commission for a decision, PGE hereby requests that the Commission consider only the incremental operations and maintenance (O&M) costs. The incremental O&M costs and revenues relate to the three Commission approved Transportation Electrification (TE) pilots, TriMet Mass Transit, Electric Avenue stations, and Education and Outreach.

PGE filed the deferral request in April 2018. We understand that the issue delaying a decision in this deferral application is the mention of an accounting order in our filing. We acknowledge in the filing that the deferral filing will depend on the resolution of capital related cost recovery. Our deferral filing also points to the then filed PGE Schedule 150 for TE cost recovery which is proposed to be an automatic adjustment clause and a tracker for capital closing to plant. That tariff has been suspended and is docketed as No. UE 360.

Thus, with the request that the Commission only take up the deferral of O&M costs, and based on discussions with Staff, we look forward to the Commission's consideration.

If you have questions or comments regarding this filing, please contact me at (503) 464-7805.

Please direct all formal correspondence and requests to the following email address:
pge.opucfilings@pgn.com.

Thank you,

A handwritten signature in blue ink, appearing to read "Stefan Brown", is written over a light blue rectangular background.

Stefan Brown
Manger, Regulatory Affairs