

December 03, 2020

## Via Electronic Filing

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

Re: UM 1986 PGE's Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Balancing Account Associated with the Multnomah County Business Income Tax Recovery

Dear Filing Center;

Enclosed for filing is Portland General Electric Company's ("PGE") Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Balancing Account Associated with the Multnomah County Business Income Tax Recovery pursuant to OPUC Order No. 19-020.

A Notice regarding the filing of this application has been provided to the parties on the UE 335 and UM 1986 service lists.

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

Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

/s/Jaki Ferchland

Jaki Ferchland Manager, Revenue Requirement

JF/np

Encls.

cc: Service List: UE 335 and UM 1986

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### UM 1986

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY

Application for Deferral Reauthorization of Costs to Support the Use of Balancing Accounts Associated with the MCBIT Recovery.

PORTLAND GENERAL ELECTRIC COMPANY APPLICATION FOR DEFERRAL REAUTHORIZATION

Pursuant to ORS 757.259 and OAR 860-027-0300, and Commission Order 19-020. Portland General Electric Company (PGE) hereby requests authorization to continue to defer certain costs and revenues associated with PGE's balancing account for the Multnomah County Business Income Tax (MCBIT) Recovery.

### I. Deferral Summary

This application (Application) is filed to support a balancing account that is used to record the activity of a Commission-approved mechanism, in conjunction with PGE Schedule 106. PGE requests this deferral have an effective date of December 7, 2020 and be subject to annual renewals as long as the MCBIT balancing account is in place. PGE will not seek amortization of the deferred amounts in a future proceeding as the deferred amounts will automatically reverse due to the standard operation of the approved MCBIT mechanism. In short, approval of this application will permit PGE to continue using the established MCBIT balancing account mechanism as approved by the OPUC. In accordance with prior Commission Orders, amounts in the MCBIT balancing account will

continue to be rolled forward and can have either positive or negative (i.e., debit or credit) balances. Section A below provides further details regarding PGE's balancing account.

## II. OAR 860-027-0300 Requirements

The following is provided pursuant to OAR 860-027-0300(3):

# a. <u>Description of Utility Expense for Which Deferred Accounting is Requested</u>

See Deferral Summary above. In prior regulatory filings PGE proposed and the Commission approved PGE to establish a balancing account for recording costs and revenues related to MCBIT Recovery. The balancing account associated with the MCBIT Recovery is maintained to accrue the difference between PGE's actual local income tax liability and the amount collected from customers under Schedule 106. Any temporary over- or under-collection reflected in this account is considered when the MCBIT rate is updated.

In compliance with Commission Order No. 19-020 and at the OPUC Staff's direction, PGE submits this Application to support the balancing account and to address the occasions when there is any variance – positive or negative – that roll forward within the MCBIT Recovery balancing account.

#### b. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks to continue deferred accounting treatment for costs and revenues associated with the MCBIT recovery to support the use of a related balancing account. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. Approving the Application will not authorize a change in rates but will permit PGE to continue using the balancing account associated with the MCBIT Recovery as intended and approved through prior Commission orders.

### c. <u>Proposed Accounting for Recording Amounts Deferred.</u>

MCBIT Recovery accounting treatment: the balancing account is recorded into FERC Account 242 (Current Regulatory Liability). MCBIT Payments are debited to FERC Account 242 and credited to FERC Account 407.4 (Regulatory Credit). MCBIT amortization is credited to FERC Account 242 and debited to FERC Account 407.4. Interest is accrued on the balance at the approved blended treasury rate.

#### d. Estimate of Amounts to be Recorded for the Next 12 months.

PGE does not have an estimate of the amounts to be deferred because they can vary depending on the level of costs and revenues. However, it is possible that the MCBIT balance for the next 12-month period will be similar to the forecasted December 2020 MCBIT ending balance, which is approximately \$150,000.

#### e. Notice

A copy of the Notice of Application for Deferral of Costs and Revenues to Support PGE's Balancing Accounts and a list of persons served with Notice are attached to the Application as Attachment A. In compliance with OAR 860-027-0300(6), PGE is serving Notice of Application on the UE 335 and UM 1986 Service Lists.

# III. The following is provided pursuant to OAR-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 deferred accounting treatment for costs and revenues associated with the MCBIT balancing account. Without reauthorization this deferral will expire on December 6, 2020.

IV. Summary of Filing Conditions

a. Earnings Review.

No earnings review is applicable as PGE will not seek separate amortization of the

deferred amounts in a future proceeding because all associated costs and revenues will continue

to flow through the established balancing account.

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review

of PGE's general rate case filings.

c. Sharing Percentages

All prudently incurred costs are to be recoverable by PGE with no sharing mechanism.

d. Rate Spread/Rate Design

Rate Spread/Rate Design is applied in accordance with PGE Schedule 106. PGE will not

seek amortization of the deferred amounts in a future proceeding because all associated costs and

revenues will continue to flow through the established balancing account.

e. Three percent test (ORS 757.259(6))

The three percent test would not apply because PGE will not seek amortization of

the deferred amounts in a future proceeding.

V. PGE Contacts

Written communications regarding this Application should be addressed to:

Douglas C. Tingey Associate General Counsel Portland General Electric

1 WTC1301

121 SW Salmon Street Portland, OR 97204 Phone: 503.464.8926

E-mail: doug.tingey@pgn.com

PGE-OPUC Filings Rates & Regulatory Affairs Portland General Electric

1 WTC 0306

121 SW Salmon Street 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:

Stefan Cristea, Senior Regulatory Analyst, Regulatory Affairs

E-mail: <u>Stefan.cristea@pgn.com</u>

a. Conclusion

For the reasons stated above, PGE requests permission to defer the costs and revenues

related to MCBIT Recovery balancing account including any amounts that are rolled forward

into the associated balancing account calculations.

DATED this 3<sup>rd</sup> day of December, 2020.

Respectfully Submitted,

/s/ Jakí Ferchland

Jaki Ferchland

Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street, 1WTC0306

Portland, OR 97204 Telephone: 503.464.7488

E-Mail: jacquelyn.ferchland@pgn.com

# **UM 1986**

# **Attachment A**

Notice of Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Balancing Account Associated with the MCBIT Recovery

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### OF OREGON

#### **UM 1986**

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY

Application for Deferral Reauthorization of Costs to Support the Use of Balancing Accounts Associated with the MCBIT Recovery.

PORTLAND GENERAL ELECTRIC COMPANY NOTICE OF APPLICATION FOR DEFERRAL REAUTHORIZATION

On December 3, 2020, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission or OPUC) for an Order reauthorizing deferral of costs and revenues to support PGE's use of the established balancing account for the Multnomah County Business Income Tax (MCBIT) Recovery.

Approval of PGE's Application will not authorize a change in PGE's rates, but will permit PGE to continue using the MCBIT Recovery balancing account mentioned above as approved through prior Commission Orders.

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 January 3, 2021.

Dated this 3<sup>rd</sup> day of December, 2020.

/s/ Jakí Ferchland

Jaki Ferchland Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street, 1WTC0306 Portland, OR 97204

Telephone: 503.464.7488

E-Mail: jacquelyn.ferchland@pgn.com

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the Notice of Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Balancing Account Associated with the Multnomah County Business Income Tax Recovery to be served by electronic mail to those parties on the attached service list for OPUC Docket Nos. UE 335 and UM 1986.

Dated at Portland, Oregon, 3rd day of December, 2020.

/s/ Jakí Ferchland

Jaki Ferchland Manager, Revenue Requirement Portland General Electric Company 121 SW Salmon Street, 1WTC0306 Portland, OR 97204

Telephone: 503.464.7488

E-Mail: jacquelyn.ferchland@pgn.com

Certificate of Service Page 1

# SERVICE LIST OPUC DOCKET UE 335

ROBERT D KAHN PO BOX 504

NORTHWEST & INTERMOUTAIN POWER MERCER ISLAND WA 98040

PRODUCERS COALITION rkahn@nippc.org

ALBERTSONS

BRIAN BETHKE 250 PARKCENTER BLVD

11555 DUBLIN CANYON ROAD BOISE ID 83706

brian.bethke@albertsons.com

CHRIS ISHIZU 250 PARKCENTER BLVD

ALBERTSONS COMPANIES, INC. BOISE ID 83706

chris.ishizu@albertsons.com

GEORGE WAIDELICH 11555 DUBLIN CANYON ROAD

ALBERTSONS COMPANIES' INC. PLEASANTON OR 94588

george.waidelich@albertsons.com

**AWEC UE 335** 

BRADLEY MULLINS (C) 1750 SW HARBOR WAY STE 450

MOUNTAIN WEST ANALYTICS PORTLAND OR 97201 brmullins@mwanalytics.com

TYLER C PEPPLE (C) 1750 SW HARBOR WAY STE 450

DAVISON VAN CLÈVE, PC PORTLAND OR 97201

tcp@dvclaw.com

ROBERT SWEETIN (C) 185 E. RENO AVE, SUITE B8C

DAVISON VAN CLEVE, P.C. LAS VEGAS NV 89119

rds@dvclaw.com

**CALPINE SOLUTIONS** 

GREGORY M. ADAMS (C) PO BOX 7218 RICHARDSON ADAMS, PLLC 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) 215 STATE ST - STE 200

ENERGY STRATEGIES LLC SALT LAKE CITY UT 84111-2322

khiggins@energystrat.com

FRED MEYER

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

kboehm@bkllawfirm.com

JODY KYLER COHN (C) 36 E SEVENTH ST STE 1510 BOEHM, KURTZ & LOWRY CINCINNATI OH 45202

jkylercohn@bkllawfirm.com

SPENCER GRAY sgray@nippc.org

**NIPPC** 

IRION A SANGER (C) 1041 SE 58TH PLACE SANGER LAW PC PORTLAND OR 97215

irion@sanger-law.com

JONI L. SLIGER 1041 SE 58TH PLACE SANGER LAW PC PORTLAND OR 97215

joni@sanger-law.com

OREGON CITIZENS UTILITY BOARD

OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400

PORTLAND OR 97205 dockets@oregoncub.org

MICHAEL GOETZ (C) 610 SW BROADWAY STE 400

OREGON CITIZENS' UTILITY BOARD PORTLAND OR 97205 mike@oregoncub.org

ROBERT JENKS (C) 610 SW BROADWAY, STE 400

OREGON CITIZENS' UTILITY BOARD PORTLAND OR 97205 bob@oregoncub.org

**PACIFICORP** 

PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000

PORTLAND OR 97232 oregondockets@pacificorp.com

MATTHEW MCVEE 825 NE MULTNOMAH PACIFICORP PORTLAND OR 97232

matthew.mcvee@pacificorp.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 121 SW SALMON ST, 1WTC0306

PORTLAND GENERAL ELECTRIC PORTLAND OR 97204

jaki.ferchland@pgn.com; pge.opuc.filings@pgn.com

DOUGLAS C TINGEY (C) 121 SW SALMON 1WTC1301 PORTLAND GENERAL ELECTRIC PORTLAND OR 97204

doug.tingey@pgn.com

**SBUA** 

JAMES BIRKELUND 548 MARKET ST STE 11200

SMALL BUSINESS UTILITY ADVOCATES SAN FRANCISCO CA 94104 james@utilityadvocates.org

DIANE HENKELS (C) 621 SW MORRISON ST. STE 1025

SMALL BUSINESS UTILITY ADVOCATES PORTLAND OR 97205
diane@utilityadvocates.org

**STAFF** 

STEPHANIE S ANDRUS (C) BUSINESS ACTIVITIES SECTION

PUC STAFF--DEPARTMENT OF JUSTICE 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

# SERVICE LIST OPUC DOCKET UM 1986

PORTLAND GENERAL ELECTRIC PGE RATES & REGULATORY AFFAIRS COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com 121 SW SALMON ST, 1WTC 0306 STEFAN CRISTEA PORTLAND GENERAL ELECTRIC PORTLAND OR 97204 stefan.cristea@pgn.com MITCH MOORE PO BOX 1088 SALEM OR 97308-1088 PUBLIC UTILITY COMMISSION OF OREGON mitch.moore@state.or.us SOMMER MOSER 1162 COURT ST NE PUC STAFF - DEPARTMENT OF **SALEM OR 97301** JUSTICE sommer.moser@doj.state.or.us DOUGLAS C TINGEY 121 SW SALMON 1WTC1301 PORTLAND GENERAL ELECTRIC PORTLAND OR 97204

doug.tingey@pgn.com