

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

February 21, 2020

Via Electronic Filing

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

Attn: OPUC Filing Center

Re: UM 2003 PGE's Application for the Deferral of Costs and Revenues Associated with the Electric Vehicle Charging Pilots

Enclosed for filing is Portland General Electric Company's ("PGE") Supplement to its February 22, 2019 Application for the Deferral of Costs and Revenues Associated with the Electric Vehicle Charging Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UM 2003 service list.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7805.

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

Sincerely,

Jaki Ferchland

Manager, Revenue Requirement

JF/np

Enclosure

cc: Service List: UM 2003

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2003

In the Matter of the Application of Portland)
General Electric Company for an Order)
Approving the Deferral of Costs and)
Revenues Associated with Electric Vehicle)
Charging Pilots

Supplement to Application for Authorization to Defer the Costs and Revenues Associated with Electric Vehicle Charging Pilots

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company ("PGE") hereby respectfully supplements its requests for authorization to defer the costs and revenues associated with the two Electric Vehicle Charging Pilots ("EV Charging Pilots" or "Pilots").

I. <u>Deferral Status</u>

On February 15, 2019, PGE filed its initial request to defer the costs and revenues associated with the EV Charging Pilots. On February 22, 2019, PGE filed an amended application to defer the costs and revenues associated with the EV Charging Pilots. The amended application merely corrected the effective date of the deferral application and the filing condition relating to the allocation for Rate Spread/Rate Design. Because the Commission has not yet approved PGE's request for deferred accounting and because the conditions related to the deferral have changed, PGE proposes to modify the following aspects of the previous UM 2003 applications.

Initial Proposals to Modify:

- PGE requested that the deferral would support an automatic adjustment clause ("AAC") rate schedule for the Pilots' 10-year period.
- PGE proposed that the AAC would allow the tracking in of capital costs.

Section II.A., "Earnings Review" – PGE proposed that cost recovery associated with the Pilots not be subject to an earnings review since it would be subject an automatic adjustment clause.

Proposed Modifications:

- PGE has withdrawn Schedule 150 and proposes that the requested deferral not support an AAC. Instead, amortization of the EV Charging Pilots will be determined in a future Commission proceeding.
- PGE does not seek the tracking in of capital costs associated with the EV Charging Pilots.
 Instead, the only costs to which the requested deferral would apply are operations and maintenance expenses ("O&M").
- Section II.A., "Earnings Review" recovery of the EV Charging Pilots costs will be subject to an earnings review in accordance with ORS 757.259(5).

Description of Amounts:

To date, PGE has incurred less than \$100,000 for the two pilots. Additional detail regarding the forecasted costs are provided in PGE's deferral reauthorization filing submitted February 21, 2020.

II. Conclusion

For the reasons stated in the February 15, 2019 and February 22, 2019 applications and with the above-noted modifications, PGE requests that the Commission issue an order granting its request to defer the costs and revenues associated with the EV Charging Pilots.

DATED this February 21, 2020.

Respectfully Submitted,

aki Ferchland

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

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Attachment A

Notice of Supplement to Application for Authorization to Defer the Costs and Revenues Associated with the Electric Vehicle Charging Pilots

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1938

In the Matter of the Application of Portland) Supplement to Application for General Electric Company for an Order) Authorization to Defer the Costs and Approving the Deferral of Costs and) Revenues Associated with Electric Vehicle Charging Pilots

Charging Pilots

On February 21, 2020, Portland General Electric Company ("PGE") filed a supplement to its application with the Public Utility Commission of Oregon (the "Commission") for an Order authorizing deferral of costs and revenues associated with Electric Vehicle Charging Pilots

Approval of PGE's Application will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred costs in rates in a subsequent proceeding.

Persons who wish to obtain a copy of PGE's supplemental 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 March 20, 2020.

Dated this February 21, 2020

Jaki Ferchland

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the Notice of Supplemental Application for the Reauthorization of the Deferral of Costs and Revenues Associated with the Electric Vehicle Charging Pilots to be served by electronic mail to those parties whose email addresses appear on the attached service list to those parties on the attached service list for OPUC Dockets UM 1938.

Dated at Portland, Oregon, this 21 day of February, 2020.

Jaki Ferchland

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UM 2003

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