



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

December 6, 2022

Via Electronic Filing

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

Re: UM 2039 PGE's Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Balancing Account Associated with the Energy Efficiency Customer Service

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 Energy Efficiency Customer Service pursuant to Commission Order No. 19-020.

A Notice regarding the filing of this application has been provided to the parties on the UE 394 and UM 2039 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/dm

Enclosure
cc: Service List: UE 394 and UM 2039

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2039

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral Reauthorization to
Support the Use of a Balancing Account
Associated with the Energy Efficiency
Customer Service.

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

Pursuant to ORS 757.259, OAR 860-027-0300, and Public Utility Commission of Oregon (Commission or OPUC) Order Nos. 19-020 and 21-142, Portland General Electric Company (PGE) hereby requests reauthorization to defer certain costs and revenues associated with PGE's balancing account for the Energy Efficiency (EE) Customer Service.

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 110. As of the date of this filing, the Commission has taken no action on PGE's reauthorization request filed for the period covering December 7, 2021, through December 6, 2022. PGE requests this deferral reauthorization have an effective date of December 7, 2022, and be subject to annual renewals as long as Schedule 110 and the EE Customer Service balancing account are 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 EE Customer Service mechanism. In short,

approval of this Application will permit PGE to continue using the established EE Customer Service balancing account mechanism as approved by the OPUC. In accordance with prior Commission Orders, amounts in the EE Customer Service 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. Description of Utility Expense for Which Deferred Accounting is Requested

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 EE Customer Service. Specifically, PGE established a balancing account to record the differences between the actual fully loaded qualifying expenses¹ to fund PGE activities associated with enabling customers to achieve energy efficiency and the revenues collected under Schedule 110 adjusted to allow for uncollectibles, franchise fees, and other revenue-sensitive costs.

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 variances – positive or negative – between expenses incurred and revenues collected that are rolled forward within the EE Customer Service balancing account.

¹ The expenses include but are not limited to project facilitation, technical assistance, education and assistance to support programs administered by the Energy Trust of Oregon.

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 EE Customer Service to support the use of 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 this Application will not authorize a change in rates but will permit PGE to continue using the EE Customer Service balancing account as intended and approved by prior Commission orders.

c. Proposed Accounting for Recording Amounts Deferred.

The EE Customer Service balancing account is recorded in either FERC 182.3 (Regulatory Assets), when qualified expenses incurred exceed revenue collected from customers, or FERC Account 254 (Regulatory Liabilities) when qualified expenses incurred are less than revenue collected from customers. PGE amortizes the balancing account based on the rate collected from customers through Schedule 110, adjusted by revenue-sensitive costs.

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 EE Customer Service balance for the next 12-month period will be similar to the forecasted December 2022 EE Customer Service balance, which is approximately (\$1,400,000).²

e. Notice

A copy of the Notice of Application for Deferral of Costs to Support PGE's EE Balancing Account and a list of persons served with Notice are attached to the Application as Attachment A.

² This amount has increased due to a December 2021 life-to-date (through 2020) true-up credit adjustment of approx. \$500k for injury and damages insurance related costs.

In compliance with OAR 860-027-0300(6), PGE is serving Notice of Application on the UE 394 and UM 2039 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 EE Customer Service balancing account. Without reauthorization, this deferral will expire on December 6, 2022.

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. Additionally, as Schedule 106 is established as an Automatic Adjustment Clause, an earnings review is not required under ORS 757.259(5).

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of PGE's annual UM 2039 reauthorization filings.

c. Sharing Percentages

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

d. Rate Spread/Rate Design

Rate Spread/Rate Design is applied in accordance with PGE Schedule 110. 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 does 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:

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Assistant General Counsel
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Kim.burton@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric
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:

Ben Orndoff, Regulatory Analyst, Regulatory Affairs
ben.orndoff@pgn.com

b. Conclusion

For the reasons stated above, PGE requests permission to defer the costs and revenues related to the EE Customer Service balancing account including any amounts that roll forward into its balancing account calculations.

DATED this 6th day of December 2022.

Respectfully Submitted,

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company

121 SW Salmon Street, 1WTC0306

Portland, OR 97204

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UM 2039

Attachment A

Notice of Application for Reauthorization to Defer Costs and Revenues to Support PGE's Use of the Energy Efficiency Customer Service Balancing Account

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2039

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Deferral Reauthorization to
Support the Use of a Balancing Account
Associated with the Energy Efficiency
Customer Service.

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

On December 6, 2022, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (Commission or OPUC) for an Order reauthorizing deferral of costs and revenues to support PGE’s use of the established balancing account for the Energy Efficiency (EE) Customer Service.

Approval of PGE’s Application will not authorize a change in PGE’s rates but will permit PGE to continue using the EE Customer Service 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 December 31, 2022.

Dated this 6th day of December 2022.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
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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 Energy Efficiency Customer Service Balancing Account to be served by electronic mail to those parties on the attached service list for OPUC Docket Nos. UE 394 and UM 2039.

Dated at Portland, Oregon, 6th day of December 2022.

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

Portland General Electric Company

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Portland, OR 97204

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OPUC Docket No. UE 394

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SERVICE LIST
OPUC Docket No. UM 2039

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