



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

December 30, 2021

Via Electronic Filing

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

Re: UM 2046 PGE's Deferral of Costs Associated with Annual Regulatory Fee

Filing Center.

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Costs Associated with an Increase in the Annual Regulatory Fee pursuant to ORS 756.310.

A Notice regarding the filing of this application has been provided to the parties on the UM 2046 and UE 394 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
Enclosure

BEFORE THE PUBLIC UTILITY

COMMISSION OF OREGON

UM 2046

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Deferral of Costs Associated with Annual
Regulatory Fee

**Portland General Electric Company
Application for Reauthorization of Deferred
Accounting**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (PGE) respectfully requests a Public Utility Commission of Oregon (Commissioner OPUC) order reauthorizing PGE to defer, for later rate-making treatment, the costs associated with an increase in the annual regulatory fee (OPUC Fee) allowed by ORS 756.310 (Deferred Amount). PGE requests this deferral to be effective January 1, 2022 through PGE's 2022 general rate case (Docket No. UE 394) rate-effective date, if the Commission does not authorize an additional increase in the OPUC Fee in February 2022. If the Commission does authorize an additional increase in the OPUC Fee in February 2022, then PGE requests this deferral to be effective January 1, 2022 through December 31, 2022.

In support of this Application PGE states:

1. PGE is a public utility in the state of Oregon and its rates, service and accounting practices are subject to the regulation of the OPUC.
2. This application is filed pursuant to ORS 757.259 which allows the Commission, upon application, to authorize deferral of certain items.
3. Written communications regarding this Application should be addressed to:

Loretta Mabinton
Managing Assistant General Counsel
Portland General Electric Company
1WTC1301
121 SW Salmon Street
Portland OR 97204
(503) 464-7822
loretta.mabinton@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
1WTC0306
121 SW Salmon Street
Portland OR 97204
(503) 464-7805
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
Email

Manager, Revenue Requirement
jacquelyn.ferchland@pgn.com

I. OAR 860-027-0300(3) Requirements

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

A. Background Description

On May 24, 2019, Oregon Governor Kate Brown signed Senate Bill 68 (SB 68), which revises ORS 756.310 to allow the annual regulatory fee that is imposed on public utilities and telecommunications providers, for purpose of defraying costs of the OPUC, to increase from 0.3% to 0.45%. On February 26, 2020 and February 25, 2021, the Commission issued Order Nos. 20-054 and 21-066 increasing the OPUC annual regulatory fee to 0.35% and 0.375%, respectively, of gross revenue of the preceding year. In accordance with ORS 756.310, the Commission may issue another order to further increase the fee paid by public utilities. Because the current increase will remain in effect and the Commission could implement an additional fee increase in 2022, PGE requests authorization to continue to defer for later rate making treatment, the costs associated with the increase in the OPUC fee. The Commission approved PGE's initial request to defer the 2020 increase in the OPUC fee via Order No. 20-411, and they approved PGE's request to reauthorize the Deferred Amount in Order No. 21-081.

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks continued deferred accounting treatment effective January 1, 2022, for costs associated with the current and possible additional increase in the annual OPUC Fee. In summary, the imposition of all regulatory fee increases since PGE's base prices were most recently established by Commission Order No. 18-464 will be subject to this deferral until PGE is able to fully include them in a general rate case. Granting this Application will minimize the frequency of rate changes and match appropriately the costsborne by and benefits received by customers.

C. Proposed Accounting for Recording Amounts Deferred.

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets) and credit the appropriate FERC expense accounts. When specific identification of the particular source of the regulatory asset cannot be reasonably made, then FERC account 407.4 (Regulatory Credits) will be credited. In the absence of a deferred accounting order, the costs would be debited to the appropriate cost accounts.

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

PGE estimates that based on the current OPUC Fee rate, the amount to be deferred during the period beginning January 1, 2022 and ending the rate-effective date of PGE's current general rate case (Docket UE 394) to be approximately \$2.8 million. If, however, the Commission authorizes an additional increase in the regulatory fee in February 2022, that increase will not be included in PGE's UE 394 base rates and the deferral would need continue to allow recovery of those incremental costs. Those costs would not be known until and if the Commission authorizes such an increase.

E. Notice

A copy of the Notice of Application for Deferral of Costs Associated with an Increase in

the OPUC Fee and a list of persons served with the Notice are attached to this Application as Attachment A. In compliance with OAR 860-027-0300(6), PGE is serving Notice of Application on the UE 394 and UM 2046 Service Lists.

II. Summary of Filing Conditions

A. Earnings Review

Recovery of the incremental regulatory fee will be subject to an earnings review in accordance with ORS 757.259.

B. Prudence Review

A prudence review should be performed as part of the amortization filing.

C. Sharing

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

D. Rate Spread/Rate Design

The rate spread/rate design will be consistent with the prevailing rate spread/rate design at the time of the amortization.

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

The amortization of the deferred costs will be subject to the three percent test in accordance with the 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.

IV. Conclusion

For the reasons stated above, PGE requests reauthorization to defer the costs related to the increase in the annual regulatory fee, effective January 1, 2022.

DATED this 30th day of December 2021.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
(503) 464-7488
jacquelyn.ferchland@pgn.com

Attachment A

**Notice of Application for Deferral of Costs Associated with an
Increase in the Annual Regulatory Fee**

BEFORE THE PUBLIC UTILITY

COMMISSION OF OREGON

UM 2046

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Deferral of Costs Associated with Annual
Regulatory Fee

**Notice of Portland General Electric
Company Application for
Reauthorization of Deferred
Accounting**

On December 30, 2021, 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 associated with an increase in the OPUC Fee allowed by ORS 756.310.

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

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 30, 2022.

Dated this 30th day of December 2021.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
(503) 464-7488
jacquelyn.ferchland@pgn.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application for Deferral of Costs Associated with an Increase in the Annual Regulatory Fee** allowed by ORS 756.310, to be served by electronic mail on those parties whose email addresses appear in the attached service list for OPUC Docket No. UE 394 and UM 2046.

Dated at Portland, Oregon, this 30th day of December 2021.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
(503) 464-7488
jacquelyn.ferchland@pgn.com

Service List
OPUC Docket UE 394

AWEC

JESSE O GORSUCH (C) (HC)
DAVISON VAN CLEVE
1750 SW HARBOR WAY STE 450
PORTLAND OR 97201
jog@dvclaw.com

CORRINE MILINOVICH (C) (HC)
DAVISON VAN CLEVE, P.C.
1750 SW HARBOR WAY, STE. 450
PORTLAND OR 97201
com@dvclaw.com

TYLER C PEPPLER (C) (HC)
DAVISON VAN CLEVE, PC
1750 SW HARBOR WAY STE 450
PORTLAND OR 97201
tcp@dvclaw.com

CALPINE SOLUTIONS

GREGORY M. ADAMS (C) (HC)
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) (HC)
ENERGY STRATEGIES LLC
215 STATE ST - STE 200
SALT LAKE CITY UT 84111-2322
khiggins@energystrat.com

FRED MEYER

JUSTIN BIEBER (C)
FRED MEYER/ENERGY STRATEGIES LLC
215 SOUTH STATE STREET, STE 200
SALT LAKE CITY UT 84111
jbieber@energystrat.com

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
jkylersohn@bkllawfirm.com

OREGON CITIZENS UTILITY BOARD

OREGON CITIZENS' UTILITY BOARD
610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

WILLIAM GEHRKE (C)
OREGON CITIZENS' UTILITY BOARD
610 SW BROADWAY STE 400
PORTLAND OR 97206
will@oregoncub.org

MICHAEL GOETZ (C)
OREGON CITIZENS' UTILITY BOARD
610 SW BROADWAY STE 400
PORTLAND OR 97205
mike@oregoncub.org

PGE

PORTLAND GENERAL ELECTRIC
pge.opuc.filings@pgn.com

Service List
OPUC Docket UE 394

LORETTA I MABINTON (C) (HC)
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST - 1WTC1711
PORTLAND OR 97204
loretta.mabinton@pgn.com

JAY TINKER (C)
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST 1WTC-0306
PORTLAND OR 97204
pge.opuc.filings@pgn.com

SBUA

JAMES BIRKELUND
SMALL BUSINESS UTILITY ADVOCATES

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

DIANE HENKELS
SMALL BUSINESS UTILITY ADVOCATES

621 SW MORRISON ST. STE 1025
PORTLAND OR 97205
diane@utilityadvocates.org

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

JILL D GOATCHER (C)
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
jill.d.goatcher@doj.state.or.us

MATTHEW MULDOON (C)
PUBLIC UTILITY COMMISSION OF
OREGON

PO BOX 1088
SALEM OR 97308-1088
matt.muldoon@puc.oregon.gov

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

MADILILNE MALMQUIST (C)
WALMART

madelinemalmquist@parsonsbehle.com

Service List
OPUC Docket UM 2046

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

LORETTA I MABINTON
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST - 1WTC1711
PORTLAND OR 97204
loretta.mabinton@pgn.com

MITCH MOORE
PUBLIC UTILITY COMMISSION OF OREGON
PO BOX 1088
SALEM OR 97308-1088
mitch.moore@puc.oregon.gov

NATASCHA SMITH
PUC STAFF - DEPARTMENT OF JUSTICE
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301
natascha.b.smith@doj.state.or.us

PORTLAND GENERAL ELECTRIC

BEN ORNDOFF
PORTLAND GENERAL ELECTRIC
121 SW SALM ST 1WTC0306
PORTLAND OR 97204
ben.ornloff@pgn.com