



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

December 29, 2023

via email

puc.filingcenter@puc.or.gov

Public Utility Commission of Oregon

Attn: OPUC Filing Center

201 High Street, Ste. 100

P. O. Box 1088

Salem, OR 97308-1088

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

Enclosed for filing is Portland General Electric Company's Application for Reauthorization of Deferral of Costs Associated with Annual Regulatory Fee.

A Notice regarding the filing of this application has been provided to the parties on the UE 416 and UM 2046 service lists.

Parties who wish to receive a copy of this Application should review the Public Utility Commission of Oregon (OPUC) website.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488 or Greg Batzler at (503) 464-8644. 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
Senior Manager, Revenue Requirement

JF:dm
Enclosure

cc: Service Lists UE 416 & UM 2046

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, 2024 through December 31, 2024.

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:

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kim.burton@pgn.com

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

Senior 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% of gross operating revenue. 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. The 0.375% fee was included within PGE's 2022 test year general rate case (Docket No. UE 394), with an effective date of May 9, 2022. Following the inclusion of the 0.375% rate within UE 394, the Commission issued Order No. 22-062 increasing the OPUC annual regulatory fee to 0.43% of gross operating revenue. Commission Order No. 23-057 maintained the 0.43%, and this fee was included within PGE's 2024 test year general rate case (Docket No. UE 416) with an effective date of January 1, 2024. 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 2024, 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, they approved PGE's first request to reauthorize the Deferred Amount in Order No. 21-081, and PGE's second request to reauthorize the Deferred Amount in Order No. 22-145. PGE's most recent request to reauthorize was approved in Order No. 23-031.

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, 2024, 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. 23-031 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 costs borne 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 cannot estimate the amount to be deferred during the period beginning January 1, 2024 through December 31, 2024 because it is unknown if the Commission will authorize an additional increase in the regulatory fee in February 2024. If the Commission does authorize an increase to the full 0.45% allowed under SB 68, this would result in an additional increase of approximately \$0.5 million.

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 not subject to an earnings review in accordance with Commission Order No. 20-411.

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(6) 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.

III. 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, 2024.

DATED this 29th day of December 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Senior Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
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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 29, 2023, 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 29, 2024.

Dated this 29th day of December 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Senior Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
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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 416 and UM 2046.

Dated at Portland, Oregon, this 29th day of December 2023.

/s/ Jaki Ferchland

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