



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

March 23, 2021

Via Electronic Filing

Public Utility Commission of Oregon
P. O. Box 1088
Salem, OR 97308-1088

Re: UM 2064 PGE's Application for Reauthorization to Defer Costs Associated with the COVID-19 Emergency

Dear Filing Center,

Enclosed for filing is Portland General Electric Company's ("PGE") Application for Reauthorization to Defer Costs Associated with the COVID-19 Emergency.

A Notice regarding the filing of this application has been provided to the parties on the UM 2064 and UE 335 (PGE's last general rate case) 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
cc: Service Lists: UM 2064; UE 335

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2064

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for an Order Reauthorizing the
Deferral of Costs Associated with the
COVID-19 Emergency

**PORTLAND GENERAL ELECTRIC
COMPANY'S APPLICATION FOR
REAUTHORIZING THE DEFERRAL
OF COSTS ASSOCIATED WITH THE
COVID-19 EMERGENCY**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (PGE) hereby requests an order reauthorizing PGE to defer for later ratemaking treatment recovery of costs from the COVID-19 impacts in PGE's service territory (the "Deferred Amount"). PGE seeks reauthorization to defer the recovery of the COVID-19-related costs for an additional 12-month period (the "Deferral Period") and will seek amortization of the Deferred Amount in a future Commission proceeding. 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 Public Utility Commission of Oregon (Commission or OPUC).
2. This application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items for later incorporation in rates.
3. Communications regarding this Application should be addressed to:

Jay Tinker
Rates & Regulatory Affairs
Portland General Electric
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1 WTC0306
Portland, Oregon 97204
Phone: (503) 464-7002
E-mail: pge.opuc.filings@pgn.com

Douglas C. Tingey
Associate General Counsel
Portland General Electric
121 SW Salmon Street,
1 WTC 1301
Portland, Oregon 97204
Phone: (503) 464-8926
E-mail: doug.tingey@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,
Manager, Revenue Requirement
E-mail: jacquelyn.ferchland@pgn.com

Alex Tooman
Sr. Regulatory Consultant
E-mail: alex.tooman@pgn.com

4. The Deferred Amount will be subject to the costs specified by Commission Order No. 20-401, which approved the Stipulated Agreement on the Effects of COVID-19 Pandemic on Energy Utility Customers.

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

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

A. Background Description

On March 8, 2020, Governor Brown declared a statewide state of emergency due to the public health threat posed by the novel infectious coronavirus, COVID-19. In response, PGE filed a request to defer for later ratemaking treatment recovery of costs directly associated with COVID-19. PGE's initial deferral application was approved on October 27, 2020 by Commission Order No. 20-376. On November 5, 2020, the Commission issued Order No. 20-401 (Docket No. UM 2114), which adopted the Stipulated Agreement on the Effects of COVID-19 Pandemic on Energy Utility Customers. In particular, the stipulation identified the

types of costs that utilities could defer as a result of the pandemic emergency.¹ Although a phased re-opening of the Oregon economy has begun, it is not complete. Consequently, many of the impacts specified by Order No. 20-401 are on-going so that PGE expects it will continue to incur significant costs to address those impacts.

B. Reasons for Deferral

PGE seeks reauthorization of this deferral pursuant to ORS 757.259(2)(e) and Commission Order Nos. 20-401 and 20-376. This deferral will match appropriately the costs borne and benefits received by customers. PGE also seeks this reauthorization because of the on-going magnitude and extraordinary nature of the COVID-19 impacts. Because the COVID-19 emergency continues to be so unprecedented, PGE believes that the impacts are outside of reasonable business risk.

Under ORS 757.259(2)(e), deferral of utility expenses or revenues is allowed when it will appropriately match the costs borne and benefits received by customers. Deferral of these restoration costs will align the costs of PGE's service with the benefits PGE customers receive from such service.

C. Proposed Accounting

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets), crediting FERC Account 407.4 (Regulatory Credits). In the absence of a deferred accounting order, PGE would apply the costs to a variety of accounts.

D. Estimate of Amounts

Given the unprecedented nature of the emergency, PGE cannot estimate the costs associated with COVID-19 or the length of time in which the costs will continue to be incurred.

¹ Commission Order No. 20-401, Appendix A, pages 19-20.

E. Notice

A copy of the Notice of Application for Deferral of Costs Associated with the COVID-19 Emergency and a list of persons served with the Notice are attached to the application as Attachment A.

II. Summary of Filing Conditions:

A. Earnings Review:

Cost recovery for costs associated with the COVID-19 emergency will be subject to an earnings review in accordance with ORS 757.259(5).

B. Prudence Review:

A prudence review will be performed by the OPUC Staff no later than the proceeding to authorize amortization of the costs associated with COVID-19.

C. Sharing Percentages:

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 determined during the proceeding to authorize amortization of the costs associated with COVID-19.

E. Three or Six Percent Tests (ORS 757.259(6)(7)(8)):

Amortization of the deferred costs will be subject to a three percent test in accordance with ORS 757.259(7) or possible six percent test in accordance with ORS 757.259(8) and with Commission authorization. These tests limit aggregated deferral amortizations during a 12-month period to no more than three or six percent of the utility's gross revenues for the preceding year.

III. Conclusion

For the reasons stated above, PGE requests reauthorization to defer costs associated with COVID-19 for the Deferral Period.

DATED this March 23, 2021

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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Attachment A

Notice of Application for Reauthorization to Defer Costs Associated with the COVID-19 Emergency

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for an Order Reauthorizing the
Deferral of Costs Associated with the
COVID-19 Emergency

**PORTLAND GENERAL ELECTRIC
COMPANY'S NOTICE OF
APPLICATION FOR
REAUTHORIZING THE DEFERRAL
OF COSTS ASSOCIATED WITH THE
COVID-19 EMERGENCY**

On March 23, 2021, 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 associated with the COVID-19 emergency.

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. This application is on the OPUC website. 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 April 26, 2021.

Dated this March 23, 2021

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Reauthorization to Defer Costs Associated with the COVID-19 Emergency** to be served by electronic mail to those parties whose email addresses appear on the attached service lists for OPUC Docket Nos. UE 335 and UM 2064.

Dated at Portland, Oregon, March 23, 2021

/s/ Jaki Ferchland

Jaki Ferchland

Manager, Revenue Requirement

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