

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

December 30, 2022

Via Electronic Filing

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

Re: UM 2218 PGE's Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with the Transportation Electrification Charge

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application to Reauthorize Deferred Accounting of Costs Associated with the Transportation Electrification Charge.

A Notice regarding the filing of this application has been provided to the parties on the UE 394 and UM 2218 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 contact Megan Stratman at megan.stratman@pgn.com. All formal correspondence, questions, or requests should be directed to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

/s/ Jakí Ferchland

Jaki Ferchland Manager, Revenue Requirement

JF/dm Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2218

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY

PGE Deferral of Costs and Revenues Associated with the Transportation Electrification Charge Application for Reauthorization of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge

Pursuant to ORS 757.210, 757.259, OAR 860-027-0300, House Bill (HB) 2165, and Public Utility Commission of Oregon (Commission or OPUC) Order No. 22-200, Portland General Electric Company (PGE) hereby requests approval to continue to defer costs and revenues associated with the Monthly Meter Charge (MMC) to support transportation electrification (TE). The reauthorization will continue to support use of an automatic adjustment clause rate schedule with an associated balancing account mechanism to track the ongoing costs and recovery amounts related to the MMC, and recovery through Schedule 150. PGE requests that this deferral be effective as of January 1, 2023 through December 31, 2023. 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 regulation by the Commission.
- 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:

Kim Burton Assistant General Counsel III Portland General Electric Company 1WTC1301 121 SW Salmon Street Portland OR 97204 (573) 356-9688 kim.burton@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, Manager Revenue Requirement E-mail: jacquelyn.ferchland@pgn.com

I. Deferral History

On May 26, 2021, the Governor of Oregon signed into law House Bill (HB) 2165 requiring electric companies with more than 25,000 electricity consumers to collect an amount to support transportation electrification. The law went into effect on January 1, 2022. The total amounts collected under this law must be set to one quarter of one percent of the total revenues collected by the electric company from all retail electricity consumers. Funds collected must be expended by the electric company to support and integrate transportation electrification, consistent with a budget approved by the OPUC.

PGE submitted an application for the deferral of costs and revenues associated with the MMC for the period of January 1, 2022 through December 31, 2022, which was approved by the Commission in Order 22-200. PGE is not including any forecast or estimate of the MMC in customer prices through a general rate case or any other proceeding in order to clearly show the collection and use of the funds collected under the MMC.

In July 2022 in Docket No. UM 2033, PGE submitted a Budget (i.e., proposed spending) of the 2022 MMC funds, which was approved by the Commission in Order 22-381.

To continue to meet HB 2165 requirements, PGE requests reauthorization to continue to defer incremental costs and revenues associated with the MMC.

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

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

A. Description of Utility Expense for Which the Deferred Accounting is Requested.

See Deferral History above.

A. <u>Reasons for Deferral</u>

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks to reauthorize deferred accounting treatment for costs and revenues associated with the MMC. The approval of this Application will support the use of an automatic adjustment clause and associated balancing account so that the referenced TE costs and revenues can be kept distinct and separate from PGE's other costs and revenues. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers.

B. <u>Proposed Accounting for Recording Amounts Deferred.</u>

PGE proposes the following MMC accounting treatment: the balancing account will be recorded in FERC account 242 (Current Regulatory Liability). MMC payments (i.e., payments to support and integrate transportation electrification) will be debited to FERC Account 242 and credited to FERC Account 407.4 (Regulatory Credit). MMC amortization (i.e., revenues collected from PGE's customers via Schedule 150) will be credited to FERC Account 242 and debited to FERC Account 407.4. Interest will accrue on the balance at the approved modified blended treasury rate.

C. <u>Estimate of Amounts to be Recorded for the Next Twelve Months.</u>

PGE forecasts collection of approximately \$5.9 million of MMC revenues in 2023. The Budget for expenditure of the amount collected in 2023 will be proposed by PGE in 2023 per the Division 87 rules that govern Transportation Electrification Plans, or as otherwise directed by the OPUC.

For the amount collected in 2022, PGE incurred costs of approximately \$158,000 in 2022, per the Budget approved by the OPUC in Order 22-381. As of this filing, PGE expects to incur O&M costs of approximately \$5,042,000 in 2023, as shown in Table 1 below. Actual expenditures in 2023 may exceed this amount, in accordance with the Budget for the funds collected in 2023 and budgeted as discussed above.

Activity	Approved Budget ¹	2022 Actual	2023 Forecast
Business EV Charging Rebates	1,950	-	1,950
Residential Panel Upgrade Rebates	608	-	608
Trade Ally Network	130	-	130
Affordable Housing EV-Ready Funding	1,000	-	1,000
Municipal Charging Collaborations Pilot	500	-	500
Education and Outreach	555	106	449
TE Plan Enablement	457	52	405
Total	5,200	158	5,042

 Table 1.

 Monthly Meter Charge Budget and Expected Costs (in \$ '000s)

D. <u>Notice</u>

A copy of the Notice of Application for Reauthorization of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge and a list of persons served with Notice are attached to this Application as Attachment A. In compliance with

¹ Per Order No. 22-381

OAR 860-027-0300(6), PGE is serving the Notice of Application on the UE 394 and UM 2218 Service Lists.

III. Summary of Filing Conditions

A. Earnings Review

Cost recovery associated with this deferral will not be subject to an earnings review since it would be subject to an automatic adjustment clause and recovery of costs via Schedule 150.

B. <u>Prudence Review</u>

A prudence review should be performed by the Commission Staff as part of their review of this deferral's annual reauthorization filings or applications to update Schedule 150.

C. Sharing

No sharing mechanism applies to the MMC costs or revenues.

D. <u>Rate Spread/Rate Design</u>

Applicable costs will be allocated to each schedule using the applicable schedule's forecasted energy on the basis of an equal percent of revenue applied on a cents-per-kWh basis, with direct access customers priced at cost of service.

E. <u>Three Percent Test (ORS 757.259(6))</u>

The amortization of the MMC 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 twelve-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 approval to continue to defer the costs and revenues associated with the MMC effective January 1, 2023 through December 31, 2023.

DATED this 30th day of December 2022.

/s/ Jakí 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 Reauthorization of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2218

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY

PGE Deferral of Costs and Revenues Associated with the Transportation Electrification Charge Notice of Application for Reauthorization of Deferred Accounting for Costs and Revenues Associated with the Transportation Electrification Charge

On December 30, 2022, Portland General Electric Company (PGE) filed an Application with the Public Utility Commission of Oregon (the Commission or OPUC) to reauthorize the deferral of costs and revenues associated with the Transportation Electrification (TE) Charge.

Approval of PGE's Application as proposed will support the use of an automatic adjustment clause rate schedule and balancing account to reflect the incremental costs and revenues associated with the MMC.

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, 2023.

Dated this 30th day of December 2022.

/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 Reauthorization of Deferred Accounting for Costs and Revenues Associated with the Transportation

Electrification Charge to be served by electronic mail to those parties on the attached service lists

for OPUC Docket Nos. UE 394 and UM 2218.

Dated at Portland, Oregon, this 30th day of December 2022.

/s/ Jakí Ferchland

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

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