



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

December 28, 2023

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 416 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 Stephen Leeb at stephen.leeb@pgn.com. All formal correspondence, questions, or requests should be directed to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

/s/ Jaki 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 Incremental Costs and
Revenues Associated with the
Transportation Electrification Charge

**Application for Reauthorization of
Deferred Accounting for Incremental 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. 23-287, Portland General Electric Company (PGE) hereby requests approval to continue to defer incremental 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 MMC revenues collected and associated costs incurred, with recovery through Schedule 150. PGE requests that this deferral be effective as of 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 regulation by the Commission.
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:

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, Senior 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 incremental 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 No. 22-381.

This budget for MMC funds was updated in April 2023, as approved by Commission Order No. 23-147. The most up to date MMC budget was submitted as a part of PGE's TE Plan, which was approved by Commission Order No. 23-380.

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.

B. Reasons for Deferral

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.

C. Proposed Accounting for Recording Amounts Deferred.

PGE proposes the following MMC accounting treatment: the balancing account will be recorded in FERC account 254 (Current Regulatory Liability). MMC payments (i.e., payments to support and integrate transportation electrification) will be debited to FERC Account 254. MMC amortization (i.e., revenues collected from PGE's customers via Schedule 150) will be credited to

FERC Account 254 and debited to FERC Account 908. Interest will accrue on the balance at the approved modified blended treasury rate.

D. Estimate of Amounts to be Recorded for the Next Twelve Months.

PGE forecasts a collection of approximately \$7.9 million of MMC revenues in 2023. As of this filing, PGE forecasts to incur O&M costs of approximately \$7,307,000 in 2024. Actual expenditures in 2024 may exceed this amount in alignment with the budget stated in OPUC Docket UM 2033. Full year actuals for 2023 are not available at the time of this filing and will be included in the Division 87 annual report as a part of OPUC Docket UM 2033.

E. Notice

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 OAR 860-027-0300(6), PGE is serving the Notice of Application on the UE 416 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 as the amounts collected are based on a quarter of one percent of revenues as mandated by Oregon House Bill 2165. All amounts collected must be spent to support and integrate transportation electrification. As such, there will never be amounts for refund or additional collection.

B. Prudence Review

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. Rate Spread/Rate Design

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. Three Percent Test (ORS 757.259(6))

As there are no amounts to be amortized under the construct of this deferral filing, the three percent test would not apply.

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, 2024 through December 31, 2024.

DATED this 28th day of December 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Senior 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 28, 2023, 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 22, 2024.

Dated this 28th day of December 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Senior 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 Incremental 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 416 and UM 2218.

Dated at Portland, Oregon, this 28th day of December 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Senior 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 NO. UE 416**

GUILERMO CASTILLO (C) (HC) SMALL BUSINESS UTILITY ADVOCATES	guillermo@utilityadvocates.org
STEVE CHRISS WALMART	stephen.chriss@wal-mart.com
TERESA GRIFFELS PORTLAND GENERAL ELECTRIC	teresa.griffels@pgn.com
TONIA L MORO (C) ATTORNEY AT LAW PC	106 TALENT AVE STE 6 TALENT OR 97540 tonia@toniamoro.com
AWEC	
BRENT COLEMAN (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY, SUITE 450 PORTLAND OR 97201 blc@dvclaw.com
JESSE O GORSUCH (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 jog@dvclaw.com
TYLER C PEPPE (C) (HC) DAVISON VAN CLEVE	107 SE WASHINGTON ST STE 430 PORTLAND OR 97214 tcp@dvclaw.com
CALPINE SOLUTIONS	
GREGORY M. ADAMS (C) RICHARDSON ADAMS PLLC	515 N 27TH ST 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) ENERGY STRATEGIES LLC	215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com
COMMUNITY ENERGY PROJECT	
KATE AYRES COMMUNITY ENERGY PROJECT	106 TALENT AVE STE 6 TALENT OR 97540 kate@communityenergyproject.org

CHARITY FAIN (C)
COMMUNITY ENERGY
PROJECT

2900 SE STARK ST STE A
PORTLAND OR 97214
charity@communityenergyproject.org

CUB

MICHAEL GOETZ (C) (HC)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97205
mike@oregoncub.org

Share OREGON CITIZENS'
UTILITY BOARD
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org

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
BOEHM KURTZ & LOWRY

36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkylercohn@bkllawfirm.com

NEWSUN ENERGY

LESLIE SCHAUER (C)
NEWSUN ENERGY LLC

550 NW FRANKLIN AVE STE 408
BEND OR 97703
leslie@newsunenergy.net

JACOB (JAKE) STEPHENS (C)
NEWSUN ENERGY LLC

550 NW FRANKLIN AVE STE 408
BEND OR 97703
jstephens@newsunenergy.net

NRDC

CAROLINE CILEK (C) (HC)
GREEN ENERGY INSTITUTE

carolinecilek@lclark.edu

NW ENERGY COALITION

F. DIEGO RIVAS (C) (HC)
NW ENERGY COALITION

1101 8TH AVE
HELENA MT 59601
diego@nwenergy.org

PARSONS BEHLE & LATIMER

JUSTINA A CAVIGLIA
PARSONS BEHLE & LATIMER

50 WEST LIBERTY ST STE 750
RENO NV 89501
jcaviglia@parsonsbehle.com

PGE

PORTLAND GENERAL
ELECTRIC

pge.opuc.filings@pgn.com

KIM BURTON (C) (HC)
PORTLAND GENERAL
ELECTRIC

121 SW SALMON STREET
PORTLAND OR 97204
kim.burton@pgn.com

JAKI FERCHLAND (C) (HC)
PORTLAND GENERAL
ELECTRIC

121 SW SALMON ST. 1WTC0306
PORTLAND OR 97204
jacquelyn.ferchland@pgn.com

**SMALL BUSINESS UTILITY
ADVOCATES**

DIANE HENKELS (C) (HC)
SMALL BUSINESS UTILITY
ADVOCATES

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

SBUA SBUA
SMALL BUSINESS UTILITY
ADVOCATES

9450 SW GEMINI DR. #11200
BEAVERTON OR 97008
britt@utilityadvocates.org

STAFF

STEPHANIE S ANDRUS (C) (HC)
Oregon Department of Justice

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@doj.state.or.us

MATTHEW MULDOON (C) (HC)
PUBLIC UTILITY COMMISSION
OF OREGON

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

NATASCHA SMITH (C) (HC)
Oregon Department of Justice

BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301
natascha.b.smith@doj.state.or.us

WALMART

ALEX KRONAUER (C)
WALMART

alex.kronauer@walmart.com

**SERVICE LIST
OPUC DOCKET NO. UM 2218**

BETSY BRIDGE OREGON DEPARTMENT OF JUSTICE	1162 COURT STREET SALEM OR 97301-4520 betsy.bridge@doj.state.or.us
KIM BURTON PORTLAND GENERAL ELECTRIC	121 SW SALMON STREET PORTLAND OR 97204 kim.burton@pgn.com
CURTIS DLOUHY PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 curtis.dlouhy@puc.oregon.gov
JAKI FERCHLAND PORTLAND GENERAL ELECTRIC	121 SW SALMON ST. 1WTC0306 PORTLAND OR 97204 jacquelyn.ferchland@pgn.com
Share PGE RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com