



**Portland General Electric Company**  
121 SW Salmon Street • Portland, Oregon 97204  
PortlandGeneral.com

July 9, 2014

*Email / US Mail*

[puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)

Commission Filing Center  
Oregon Public Utility Commission  
3930 Fairview Industrial Drive, SE  
Salem, OR 97308-1088

**Re: UM 1482 Revised Application for Reauthorization to Defer Expenses  
Associated with a Photovoltaic Volumetric Incentive Rate Pilot**

Pursuant to ORS 757.259 and OAR 860-027-0300, enclosed for filing are the original and five copies of Portland General Electric's Revised Application for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot. Per OAR 860-027-0300(2), the authorized deferred account expires 12 months from the date the deferral was reauthorized or May 6, 2014.

After discussing the original filing with OPUC Staff, PGE files this revised application by electronic mail with the Filing Center. This revision provides deferral account detail through calendar year 2013, and the deferral balance at year end 2013. Parties to service lists UM 1482, UE 262 and UE 283 are being provided electronic notification only.

If you have any questions or require further information, please call me at (503) 464-7580 or Karla Wenzel at (503) 464-8718. Please direct all formal correspondence, questions, or requests to the following e-mail address: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com).

Sincerely,

A handwritten signature in black ink that reads "Patrick G. Hager". The signature is written in a cursive, slightly slanted style.

Patrick G. Hager  
Manager, Regulatory Affairs

PGH/sp  
encls.

cc: Judy Johnson

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1482**

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot

Revised Application for Reauthorization to Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, aka the PGE Solar Payment Option Pilot

Pursuant to ORS 757.259, OAR 860-027-0300, OAR 860-084-0380 and 860-083-0390, and OPUC Orders No. 10-198, and 13-250, Portland General Electric Company (“PGE”) hereby requests reauthorization to continue to defer for later rate-making treatment expenses associated with the Photovoltaic Volumetric Incentive Rate Pilot (“PV VIR”). This PV VIR Pilot is also referred to as the PGE Solar Payment Option (“Pilot”), Schedules 215, 216 and 217. PGE requests this reauthorization commence effective May 7, 2014 through May 6, 2015.

**I. Deferral History:**

Under Docket AR 538, the Commission promulgated its Division 84 rules for the PV VIR Pilot. Docket UM 1452 set out additional details of implementation through OPUC Orders No. 10-198, 10-304, 11-089 and 13-250. This Pilot provides payments to retail electric customers for electricity generated by permanently installed solar photovoltaic energy systems through Schedules 215, 216 and 217. This deferral allows PGE to recover costs associated with the Pilot, through Schedule 137, Customer Owned Solar Payment Option Cost Recovery Mechanism.

This accounting facilitates cost recovery authorized by the Commission in Order 10-198. PGE intends to recover Pilot costs from all applicable customer classes in the manner authorized by the Commission. Approval of the reauthorization application for the deferral is necessary since these incremental costs are not included in any other cost recovery mechanism.

PGE has filed and received reauthorization for this deferral, as shown in Table 1 below:

**Table 1**

<b>Filing Date</b>	<b>Renewal Period</b>	<b>Order No.</b>	<b>Approval Date</b>
5/06/2010	5/6/2010 – 5/5/2011	11-059	2/16/2011
4/28/2011	5/7/2011 – 5/6/2012	11-281	8/01/2011
5/04/2012	5/7/2012 – 5/6/2013	12-202	5/07/2012
5/02/2013	5/7/2013 – 5/6/2014	13-250	7/02/2013

**II. OAR 860-027-0300 Requirement (3):**

a. Description of Amounts

See deferral history above. The balancing account includes incremental costs consisting of volumetric incentive payments and/or retail bill offsets to participants, administrative costs associated with the PV VIR program operations, data collection, development costs for billing and website, customer surveys, and regulatory reporting requirements. Credits to the balancing account include: deposit forfeitures, interconnection application fees, customer charges, assignment fees, and the avoided energy value.

Amounts in the balancing account accrue interest at the Commission-authorized rate of return for deferred accounts.

b. Reasons for Deferral

PGE seeks reauthorization to defer incremental costs associated with this deferral pursuant to ORS 757.259(2)(e), OAR 860-027-0300, OAR 860-084-0060, OAR 860-084-0380 and 860-084-0390, and OPUC Orders No. 10-198, and 13-250. Without reauthorization this deferral will expire May 6, 2014. The reauthorization of this deferral is necessary because ORS 757.365, and UM-1452 require the Pilot, and continuation of this deferral will minimize the frequency of rate changes or fluctuations and match appropriately the costs borne by and benefits received by customers.

c. Proposed accounting

PGE proposes to record the deferred amount as a regulatory asset in FERC account 182.3, Other Regulatory Assets, with a credit to FERC account 407.4, Regulatory Credits. In the absence of a deferred accounting order from the Commission, PGE would continue to record costs associated with the Pilot to 903 Customer records and collection expenses and 908 Customer assistance expenses.

d. Estimate of Amounts

See II (a) above. The amounts to be deferred consist of incremental costs of the Pilot for (1) VIR payments to participants including any retail electricity service bill offset amounts, and (2) program costs incurred to implement and administer the requirements for the Pilot. For both cost categories, the amounts deferred depend upon actual participation levels and PV system sizes of participants in the Pilot.

PGE estimates incremental costs may range from \$6 to \$8 million for the deferral period, May 7, 2014 through May 6, 2015, consisting largely of VIR payments to participants as more systems are energized. In its 2013 regular session, the legislature enacted House Bill 2893, codified in ORS 757.365(12), adding an additional 2.5 MW capacity to the statewide program. In Docket UM 1673, 1.5 MW of that capacity of was added to PGE's pilot program. An additional enrollment window is established for customers in 2014. More systems continue to come online and there is additional capacity to enroll customers' systems; therefore, the payment amounts in 2014 and 2015 are expected to increase.

e. Notice

A copy of the notice of application for deferred accounting treatment and a list of persons served with the notice are attached to the Application as Attachment A (OAR 860-027-0300[6]).

**III. OAR 860-027-0300 Requirement (4), Reauthorization:**

a. Description of deferred account entries (revised 7-9-14)

See II a. and II c. above. The deferral balance through December 2013 is \$22,909. The systems currently online now generate less energy in the peak of the winter months. As more systems begin generating and more energy is produced in the summer months from these systems in 2013, the VIR payments will substantially increase offsetting the over collection.

b. The reason for continuing the deferred account

PGE seeks approval to continue to defer incremental costs associated with the Pilot not currently in rates. The granting of this reauthorization request will minimize the frequency of rate changes and match appropriated the costs borne by and benefits received by customers. This deferral should be continued and is necessary because ORS 757.365 requires the Pilot and the costs of both implementation and operation for the Pilot. Without reauthorization this deferral will expire on May 6, 2014.

**IV. PGE contacts:**

The authorized addresses to receive notices and communications in respect of this Application, are:

Jay Tinker  
Rates & Regulatory Affairs  
Portland General Electric,  
1 WTC0702  
121 SW Salmon Street  
Portland, Oregon 97204  
Phone: 503.464.7857  
E-mail: pge.opuc.filings@pgn.com

Douglas C. Tingey  
Associate General Counsel  
Portland General Electric,  
1 WTC1301  
121 SW Salmon Street  
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:

Karla Wenzel  
Rates and Regulatory Affairs  
Email: [karla.wenzel@pgn.com](mailto:karla.wenzel@pgn.com)

**V. Summary of Filing Conditions<sup>1</sup>:**

Information related to future amortization is listed below:

- a. Earnings Review: Schedule 137 recovers costs associated with the Solar Payment Option Pilot not otherwise included in rates. The adjustment schedule is implemented as an “automatic adjustment clause” as provided for under ORS 469A, and defined in the Renewable Portfolio Standards, ORS 757.210, and an earnings review is not applicable to this deferral. See PGE Schedules 215, 216 and 217.
- b. Prudence: Not specifically required, but Staff may review deferred costs as appropriate.
- c. Sharing (Percent): Not applicable with an automatic adjustment clause.
- d. Spread/Rate Design: In Docket UE 237, Commission Staff and parties agreed that Schedule 137 costs be allocated to each schedule (all customer classes) based on an equal percent of generation revenue applied on a cents per kilowatt-hour basis.

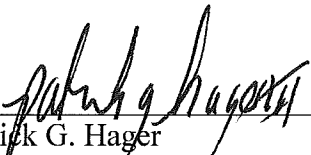
---

<sup>1</sup> Per agreement with OPUC staff on January 24, 2012

**VI. Conclusion.**

For the reasons stated above, PGE requests permission to continue to defer expenses associated with the Solar Payment Option Pilot effective May 7, 2014, until May 6, 2015.

DATED July 09, 2014.

  
\_\_\_\_\_  
Patrick G. Hager  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, OR 97204  
Telephone: 503.464.7580  
Fax: 503.464.7651  
E-Mail: patrick.hager@pge.com

**UM 1482**

**Attachment A**

**Notice of Application for Reauthorization to Defer Expenses  
Associated with a Photovoltaic Volumetric Incentive Rate Pilot,  
aka the Solar Payment Option Pilot**



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1482**

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot

**Notice Of Revised Application for Reauthorization To Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot aka the Solar Payment Option Pilot**


On July 09, 2014, Portland General Electric Company (“PGE”) filed a revised application with the Oregon Public Utility Commission (the “Commission”) for an Order authorizing deferral of certain expenses associated with a Photovoltaic Volumetric Incentive Rate Pilot, also known as PGE Solar Payment Option Pilot.

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 August 8, 2014.

DATED this 9<sup>th</sup> day of July, 2014.

  
\_\_\_\_\_  
Patrick G. Hager  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, OR 97204  
Telephone: 503.464.7580  
Fax: 503.464.7651  
E-Mail: patrick.hager@pgn.com

**Attachment B**

**Solar Payment Option  
Deferral Amounts and Program Cost**

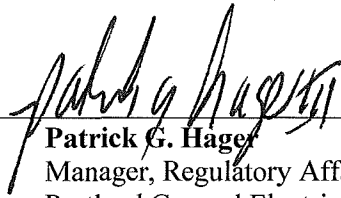
**Electronic File**

SPO Deferral	SPO 2010 Program Year	SPO 2011 Program Year	SPO 2012 PROGRAM YEAR	SPO 2013 Program Year	
Cost Categories	2010 Total	2011 Total	2012 Total	2013 Total	Balance To Date
Program Development	60,476.88	-	-	-	60,476.88
Program Administration	153,347.61	242,719.23	294,112.10	660,749.71	1,350,928.65
Incentives / Bill Credits	20,257.35	1,270,737.77	3,169,821.71	4,909,698.83	9,370,515.66
Interest	4,635.58	64,092.08	11,515.21	(3,450.22)	76,792.65
Metering	-	-	-	-	-
<b>Cost Total</b>	<b>238,717.42</b>	<b>1,577,549.08</b>	<b>3,475,449.02</b>	<b>5,566,998.32</b>	<b>10,858,713.84</b>
Credit Categories					
Deposit Forteitures	1,383.20	3,968.40	6,973.55	88,220.80	100,545.95
Collection of Interconnection Application Fee	2,288.63	5,124.40	5,435.14	5,654.63	18,502.80
Customer Charges	966.67	26,947.76	56,642.29	107,601.14	192,157.86
One Time Assignment Fee	50.00	3,825.00	9,635.40	6,750.00	20,260.40
Avoided Energy Value	1,249.71	76,053.69	220,762.87	400,832.46	698,898.73
Amortization	-	-	4,808,006.23	4,997,431.92	9,805,438.15
<b>Credit Total</b>	<b>5,938.21</b>	<b>115,919.25</b>	<b>5,107,455.48</b>	<b>5,606,490.95</b>	<b>10,835,803.89</b>

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice Of Revised Application for Reauthorization To Defer Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, aka PGE Solar Payment Option Pilot** to be served by Electronic Mail to those parties whose e-mail addresses appear on the attached service lists in UM 1482, UE 262 and UE 283.

DATED July 9, 2014.



---

**Patrick G. Hager**  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, OR 97204  
Telephone: 503-464-7580  
Fax: 503-464-7651  
E-Mail: patrick.hager@pgn.com

um 1482\_pge reauth app\_(7-08-14)

**SERVICE LIST  
OPUC DOCKET # UM 1482**

Renee France DEPARTMENT OF JUSTICE <a href="mailto:renee.m.france@doj.state.or.us">renee.m.france@doj.state.or.us</a>	Kacia Brockman OREGON DEPARTMENT OF ENERGY <a href="mailto:Kacia.brockman@state.or.us">Kacia.brockman@state.or.us</a>
	Gordon Feighner CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:gordon@oregoncub.org">gordon@oregoncub.org</a>
Robert Jenks CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>	G. Catriona McCracken CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:catriona@oregoncub.org">catriona@oregoncub.org</a>
Jay Tinker PORTLAND GENERAL ELECTRIC <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a>	Douglas C. Tingey PORTLAND GENERAL ELECTRIC <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a>
Donald Schoenbeck REGULATORY & COGENERATION SVS. INC. <a href="mailto:dws@r-c-s-inc.com">dws@r-c-s-inc.com</a>	Irion Sanger SANGER LAW PC <a href="mailto:irion@sanger-law.com">irion@sanger-law.com</a>

**SERVICE LIST  
OPUC DOCKET #UE 262**

S Brad Van Cleve DAVISON VAN CLEVE <a href="mailto:bvc@dvlaw.com">bvc@dvlaw.com</a>	Irion Sanger SANGER LAW PC <a href="mailto:irion@sanger-law.com">irion@sanger-law.com</a>
Stephanie S. Andrus DEPARTMENT OF JUSTICE <a href="mailto:stephanie.andrus@state.or.us">stephanie.andrus@state.or.us</a>	Donald W. Schoenbeck REGULATORY & COGENERATION SERVICES <a href="mailto:dws@r-c-s-inc.com">dws@r-c-s-inc.com</a>
Judy Johnson PUBLIC UTILITY COMMISSION OF OREGON <a href="mailto:judy.johnson@state.or.us">judy.johnson@state.or.us</a>	Jay Tinker PORTLAND GENERAL ELECTRIC COMPANY <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a>
Douglas C. Tingey PORTLAND GENERAL ELECTRIC COMPANY <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a>	G. Catriona McCracken CITIZENS UTILITY BOARD OF OREGON <a href="mailto:catriona@oregoncub.org">catriona@oregoncub.org</a>
OPUC Dockets CITIZENS UTILITY BOARD OF OREGON <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a>	Robert Jenks CITIZENS UTILITY BOARD OF OREGON <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>
Lisa Rackner MCDOWELL RACKNER & GIBSON PC <a href="mailto:dockets@mcd-law.com">dockets@mcd-law.com</a>	E-Filing NORTHWEST NATURAL <a href="mailto:efiling@nwnatural.com">efiling@nwnatural.com</a>

Mark Thompson NORTHWEST NATURAL <a href="mailto:mark.thompson@nwnatural.com">mark.thompson@nwnatural.com</a>	Johanna Riemenschneider OREGON DEPARTMENT OF JUSTICE <a href="mailto:johanna.riemenschneider@doj.state.or.us">johanna.riemenschneider@doj.state.or.us</a>
Gregory Adams RICHARDSON & O'LEARY <a href="mailto:greg@richardsonandoleary.com">greg@richardsonandoleary.com</a>	Kevin Higgins ENERGY STRATEGICS <a href="mailto:khiggins@energystrat.com">khiggins@energystrat.com</a>
Greg Bass Noble Americas Energy Solutions, LLC <a href="mailto:gbass@noblesolutions.com">gbass@noblesolutions.com</a>	Tommy Brooks CABLE HUSTON BENEDICT HAAGENSEN & LLOYD <a href="mailto:tbrooks@cablehouston.com">tbrooks@cablehouston.com</a>
Chad Stokes CABLE HUSTON BENEDICT HAAGENSEN & LLOYD <a href="mailto:cstokes@cablehouston.com">cstokes@cablehouston.com</a>	Paula Pyron Troutdale Energy Center <a href="mailto:ppyron@cpkinder.com">ppyron@cpkinder.com</a>
Tracy Rutten LEAGUE OF OREGON CITIES <a href="mailto:trutten@orcities.org">trutten@orcities.org</a>	Maja Haium LEAGUE OF OREGON CITIES <a href="mailto:mhaium@orcities.org">mhaium@orcities.org</a>
Sarah Wallace PACIFICORP, DBA PACIFIC POWER <a href="mailto:sarah.wallace@pacificcorp.com">sarah.wallace@pacificcorp.com</a>	Oregon Dockets PACIFICORP, DBA PACIFIC POWER <a href="mailto:oregondocket@pacificcorp.com">oregondocket@pacificcorp.com</a>
Kurt J Boehm BOEHM KURTZ & LOWRY <a href="mailto:kboehm@bkllawfirm.com">kboehm@bkllawfirm.com</a>	Jody Kyler Cohn BOEHM KURTZ & LOWRY <a href="mailto:jkyler@bkllawfirm.com">jkyler@bkllawfirm.com</a>
Nona Soltero FRED MEYER STORES/KROGER <a href="mailto:nona.soltero@fredmeyer.com">nona.soltero@fredmeyer.com</a>	R. Bryce Dalley PACIFIC POWER <a href="mailto:bryce.dalley@pacificcorp.com">bryce.dalley@pacificcorp.com</a>
Nancy Werner BEERY, ELSNER & HAMMOND LLP <a href="mailto:nancy@gov-law.com">nancy@gov-law.com</a>	Andrew Bartlett City of Hillsboro <a href="mailto:andrew.bartlett@hillsboro-oregon.gov">andrew.bartlett@hillsboro-oregon.gov</a>
Benjamin Walters City of Portland <a href="mailto:Ben.walters@portlandoregon.gov">Ben.walters@portlandoregon.gov</a>	David Tooze City of Portland <a href="mailto:david.tooze@portlandoregon.gov">david.tooze@portlandoregon.gov</a>
Samuel Roberts Hutchinson Cox Coons Orr & Sherlock <a href="mailto:sroberts@euegnelaw.com">sroberts@euegnelaw.com</a>	Steve Chriss Wal-Mart, Inc <a href="mailto:stephen.chriss@wal-mart.com">stephen.chriss@wal-mart.com</a>
Carl Fink <a href="mailto:cmfink@blueplanetlaw.com">cmfink@blueplanetlaw.com</a>	Robert Kahn NW & Intermountain Power Producers Coalition <a href="mailto:rkahn@nippc.org">rkahn@nippc.org</a>

**SERVICE LIST  
OPUC DOCKET #UE 283**

Judy Johnson PUBLIC UTILITY COMMISSION OF OREGON <a href="mailto:judy.johnson@state.or.us">judy.johnson@state.or.us</a>	Stephanie S. Andrus PUC – DEPARTMENT OF JUSTICE <a href="mailto:stephanie.andrus@state.or.us">stephanie.andrus@state.or.us</a>
Douglas C. Tingey PORTLAND GENERAL ELECTRIC COMPANY <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a>	Jay Tinker PORTLAND GENERAL ELECTRIC COMPANY <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a>
OPUC Docket CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:dockets@oregondub.org">dockets@oregondub.org</a>	Robert Jenks CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>
G. Catriona Mcracken CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:catriona@oregoncub.org">catriona@oregoncub.org</a>	Greg Bass NOBLE AMERICAS ENERGY SOLUTIONS <a href="mailto:gbass@noblesolutions.com">gbass@noblesolutions.com</a>
Kevin Higgins ENERGY STRATEGIES LLC <a href="mailto:khiggins@energystrat.com">khiggins@energystrat.com</a>	Gregory Adams RICHARDSON ADAMS PLLC <a href="mailto:greg@richardsonadams.com">greg@richardsonadams.com</a>
S Bradley Van Cleve DAVISON VAN CLEVE PC <a href="mailto:bvc@dvclaw.com">bvc@dvclaw.com</a>	Tyler C. Pepple DAVISON VAN CLEVE PC <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a>
Bradley Mullins DAVISON VAN CLEVE PC <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a>	E-Filing NORTHWEST NATURAL <a href="mailto:efiling@nwnatural.com">efiling@nwnatural.com</a>
Mark Thompson NORTHWEST NATURAL <a href="mailto:mark.thompson@nwnatural.com">mark.thompson@nwnatural.com</a>	Wendy Gerlitz NW ENERGY COALITION <a href="mailto:wendy@nwenergy.org">wendy@nwenergy.org</a>
Nona Soltero FRED MEYER STORES/KROGER <a href="mailto:Nona.soltero@fredmeyer.com">Nona.soltero@fredmeyer.com</a>	Sarah Wallace PACIFIC POWER <a href="mailto:Sarah.wallace@pacificcorp.com">Sarah.wallace@pacificcorp.com</a>
David Tooze CITY OF PORTLAND <a href="mailto:David.tooze@portlandoregon.gov">David.tooze@portlandoregon.gov</a>	Oregon Dockets PACIFICORP, DBA PACIFIC POWER <a href="mailto:oregondockets@pacificcorp.com">oregondockets@pacificcorp.com</a>
Kurt Boehm BOEHM KURTZ & LOWRY <a href="mailto:kboehm@bkllawfirm.com">kboehm@bkllawfirm.com</a>	Jody Cohn BOEHM KURTZ & LOWRY <a href="mailto:jkyler@bkllawfirm.com">jkyler@bkllawfirm.com</a>
Benjamin Walters CITY OF PORTLAND <a href="mailto:Ben.walters@portlandoregon.gov">Ben.walters@portlandoregon.gov</a>	