PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: November 21, 2017

REGULAR _____   CONSENT _X_   EFFECTIVE DATE _____ **November 22, 2017**

DATE: November 11, 2017

TO: Public Utility Commission

FROM: Mitchell Moore MPM

THROUGH: Jason Eisdorfer and John Crider

SUBJECT: PORTLAND GENERAL ELECTRIC: (Docket No. ADV 635/Advice No. 17-20) Update to Rule C, Conditions Governing Customer Attachment to Facilities.

STAFF RECOMMENDATION:

Staff recommends that the Public Utility Commission of Oregon (Commission) approve Portland General Electric's (PGE) filing Advice No. 17-20 and allow it to take effect November 22, 2017.

DISCUSSION:

Issue

Whether the Commission should allow PGE's proposed change to language in its tariff intended to clarify that costs to relocate PGE facilities will be paid by the requesting party.

Applicable Rule or Law

Under ORS 757.205(1):

> Every public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules which shall be open to public inspection, showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, or for any service in connection therewith or performed by any public utility controlled or operated by it.

The Commission may approve tariff changes if they are deemed to be fair, just and reasonable per ORS 757.210. Tariff revisions or corrections may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0005 and OAR 860-022-0025. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change. Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. ORS 757.220; OAR 860-022-0015.

Analysis

PGE filed this advice on October 11, requesting approval to modify Tariff P.U.C No. 18 associated with Rule C, Conditions Governing Customer Attachment to Facilities.

The proposed change modifies Rule C section of "Relocation or Removal of Facilities." Currently, the tariff reads, in part:

> Any relocation of Facilities for a requesting party, including builders, developers, Customers or Customer's agents, that is for their convenience will be performed by the Company at the requesting party's expense.

Generally, relocation costs are only paid for by the Company, rather than the requesting party, under certain circumstances that are specified in subsequent parts of the tariff. Accordingly, the current tariff language specifying that the customer, developer, or builder will pay for relocation or removal of PGE facilities when requested "for their convenience" causes confusion about when the requesting party must pay for relocates. To eliminate the confusion, PGE proposes to remove the "for their convenience" language from the tariff.

The proposed change does not affect how PGE recovers costs for relocating or removing its facilities and therefore will not affect customers' rates. Also, Staff agrees that it is appropriate to clarify that builders, developers, Customers and Customers' agents will pay costs of relocated facilities when the facilities are relocated at their request.

Conclusion

Staff supports the revisions filed by PGE as reasonable and recommends the
Commission approve the tariff changes as filed.

PROPOSED COMMISSION MOTION:

Approve PGE's Advice No.17-20 and allow it to go into effect with service on and after
November 22, 2017.

ADV 635 PGE Customer Attachment to Facilities