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September 27, 2022

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,  
Amortization of Boardman Deferral.  
**Docket No. UE 410**

Dear Filing Center:

Please find enclosed the Opening Testimony of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
UE 410**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Application Regarding Amortization of  
Boardman Deferral.

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**OPENING TESTIMONY OF  
BRADLEY G. MULLINS  
ON BEHALF OF  
ALLIANCE OF WESTERN ENERGY CONSUMERS**

**September 27, 2022**

1   **Q.     PLEASE STATE YOUR NAME AND OCCUPATION.**

2   A.     My name is Bradley G. Mullins. I am a consultant for MW Analytics, an independent  
3           consulting practice representing utility customers before state public utility commissions in the  
4           Northwest and Intermountain West. My witness qualification statement can be found at  
5           **Exhibit AWEC/101.**

6   **Q.     PLEASE IDENTIFY THE PARTY ON WHOSE BEHALF YOU ARE TESTIFYING.**

7   A.     I am testifying on behalf of the Alliance of Western Energy Consumers (“AWEC”). AWEC is  
8           a non-profit trade association whose members are large energy users in the Western United  
9           States, including customers receiving electric services from Portland General Electric  
10          Company (“PGE”).

11   **Q.     WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12   A.     I discuss the application of an earnings test to the 2020 balances accrued for the UM 2119  
13          Boardman deferral. I also address how to consider other 2020 deferral balances when  
14          performing the earnings test, including the UM 2115 Wildfire deferral, the UM 2064  
15          COVID-19 Emergency deferral, the UM 1938 Transportation Electrification Pilot deferral, the  
16          UM 2003 Electric Vehicle Charging deferral, and the UM 2078 Battery Storage deferral.

17   **Q.     PLEASE SUMMARIZE YOUR TESTIMONY.**

18   A.     With an earnings test performed in accordance with the April 25, 2022 Order in UE 394 (the  
19          “2022 GRC”),<sup>1</sup> PGE must write off the entire 2020 balance of the UM 2115 Wildfire deferral  
20          and refund the entire 2020 balance of the UM 2119 Boardman deferral. The total UM 2119  
21          Boardman deferral balance for 2020 is \$13,913,955 plus interest—yielding a net refund of  
22          \$16,044,135 in total. The 2020 earnings test has been detailed in **Exhibit AWEC/102** based

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<sup>1</sup> Docket No. UE 394, Order, at 52-55 (Apr. 25, 2022).

on PGE's results of operations. The calculation of the Boardman deferral balance, including interest accruals, may be found in **Exhibit AWEC/103**.

**Q. WHAT WAS THE FLAW IN PGE'S PROPOSED 2020 EARNINGS TEST?**

A. PGE asserts that in 2020 it recognized a 9.47% Return on Equity ("ROE") before any refund of the Boardman deferral.<sup>2</sup> Based on that level, PGE recommends the Commission not require any refunds for the Boardman deferral in UE 410. PGE's earnings test calculation, however, is flawed because it assumes PGE will, in addition to writing off \$15,460,221 for the 2020 Wildfire deferral, write-off approximately \$16,523,600 in other deferrals not under consideration in this docket. PGE, however, is not proposing to write-off those other deferrals, nor has the Commission issued an order in those other cases that would require PGE to write-off those balances. Further, the COVID-19 deferral balance will likely not be subject to an earnings test; there is little probability that those balances will be written-off. When performing an earnings test, PGE cannot artificially reduce its earnings by assuming that it has written-off a balance unless the Commission has ordered that the amount be written-off. In **Exhibit AWEC/104**, I identify the specific write-offs PGE assumed in its flawed earnings test.

**Q. WHAT WERE PGE'S EARNINGS BEFORE ANY WRITE-OFFS OR REFUNDS?**

A. Before any write-offs or refunds, PGE's actual ROE was a 10.40%.<sup>3</sup> This value was reported in column (5) of PGE's results of operation. Thus, relative to its authorized ROE of 9.5%, PGE over earned by 0.90%, which equates to \$32,103,247 in revenues.<sup>4</sup> Accordingly, before the 2020 earnings test would otherwise restrict the amount of the Boardman deferral refund, PGE would have to be required to write-off and/or refund at least \$32,103,247 in other deferred balances. As discussed below, the order of operations in applying the earnings tests

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<sup>2</sup> UM 410, PGE/100, Liddle-Ferchland/9:4-7.

<sup>3</sup> See RE 119, 2020 Results of Operation (Revised Methodology), Cover letter at 2 (Apr. 29, 2022).

<sup>4</sup> Exhibit AWEC/104, Mullins/1:2.

matters for determining final deferred amounts, although this level of over-earning is sufficient to warrant refunding the entire Boardman deferral in all possible scenarios.

**Q. WHAT WRITE-OFFS DID PGE ASSUME WHEN IT APPLIED THE EARNINGS TEST TO THE BOARDMAN DEFERRAL?**

A. The column (7) earnings of 9.47% are based on the reversal, *i.e.*, the assumption of a write-off, for several deferrals. The balances PGE assumes will be written-off in that calculation are detailed in **Table 1**, below.

**Table 1**  
PGE's Earnings Test Calculation, Before Boardman Deferral (\$000)

	Pre-Tax NOI	NOI	Rate Base	ROE
Column (5) Results	426,787	378,140	5,037,526	10.40%
Write-off UM 1938 TE Pilots	(182)	(133)	-	
Results after UM 1938 TE Pilots Write-off	426,605	378,008	5,037,526	10.39%
Write-off UM 2003 EV Charging	(85)	(62)	-	
Results after UM 2003 EV Charging Write-off	426,520	377,945	5,037,526	10.39%
Write-off UM 2064 COVID Deferral	(10,239)	(7,475)	-	
Results after UM 2064 COVID Deferral Write-off	416,281	370,470	5,037,526	10.09%
Write-off UM 2078 Battery Storage	(18)	(13)	-	
Results after UM 2078 Battery Storage Write-off	416,263	370,457	5,037,526	10.09%
Write-off UM 2115 Wildfire Deferral	(15,460)	(11,288)	-	
Results after UM 2115 Wildfire Deferral Write-off	400,803	359,169	5,037,526	9.65%
Write-off Unspecified Adjustment	(6,000)	(4,381)	-	
Column (7) Results	394,803	354,788	5,037,526	9.47%

The column (5) earnings PGE reported assumes that PGE will recover all deferral balances that it recognized on its books for 2020. The underlying expense for booked deferrals are reserved and removed from 2020 results for later recovery. Thus, the results showing a 10.40% ROE assume that PGE will recover 100% of the deferrals tabulated in **Table 1**, above.

1 By reversing the deferrals in **Table 1**, PGE subsequently assumes that it will not be permitted  
2 to recover those balances.

3 **Q. DID PGE RECORD A REGULATORY ASSET FOR THE BOARDMAN DEFERRAL?**

4 A. No. PGE did not record a reserve for the Boardman deferral in 2020 in its financial statements  
5 or its results of operations. Therefore, the column (5) results, with the 10.40% ROE, do not  
6 assume that any 2020 balances will be refunded for the UM 2119 Boardman deferral. PGE  
7 disclosed on its 2020 Form 10-K that “[a]s of December 31, 2021, PGE has not recorded a  
8 regulatory liability pursuant to [the Boardman] deferral application as the Company believes its  
9 current prices are just and reasonable in light of PGE’s continued substantial investments in  
10 utility plant.”<sup>5</sup>

11 **Q. WHAT IS THE STATUS OF THE OTHER DEFERRALS PGE ASSUMES WILL BE**  
12 **WRITTEN-OFF?**

13 A. The UM 2064 COVID-19 Emergency deferral has been approved, although amortization has  
14 not yet been authorized. An earnings test has not been performed for the COVID-19  
15 Emergency deferral, nor has PGE written-off any balances in connection with the deferral. It is  
16 also unlikely that PGE will be required to write-off any of the COVID-19 Emergency deferral  
17 balances. In its April 22, 2022 Memo in UM 2064, Staff recommended “that an earnings test  
18 be applied only for the direct costs net of benefits.”<sup>6</sup> If Staff’s recommendation is accepted,  
19 there will be no earnings test applied to indirect COVID-19 costs, and zero probability of a  
20 write-off of the COVID-19 Emergency deferral balances for 2020. The portion of the 2020  
21 balance subject to an earnings test is a net credit to customers.

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<sup>5</sup> PGE 2021 Form 10-K at 48.

<sup>6</sup> UM 2064, Staff Memo at 5 (April 22, 2022).

1           The 2020 balances for the UM 1938 Transportation Electrification Pilot and the UM  
2           2003 Electric Vehicle Charging deferral were addressed in PGE's 2022 GRC.<sup>7</sup> While PGE did  
3           not seek to amortize those balances in the 2022 GRC, PGE proposed that the balances continue  
4           to be deferred and included in Schedule 150 at a later date. As of this date, PGE has not sought  
5           amortization and no earnings test has been applied to the 2020 balances for these deferrals.  
6           Accordingly, PGE has not yet written-off any balances associated with these dockets.

7           The 2020 balances for the UM 2078 Energy Storage deferral were, like the  
8           Transportation Electrification deferrals, discussed in PGE's 2022 GRC.<sup>8</sup> Like the  
9           Transportation Electrification Pilot, PGE proposed that the UM 2078 Energy Storage deferral  
10          balances continue to be deferred for later recovery in Schedule 138. As of this date, PGE has  
11          not sought amortization and no earnings test has been applied to the 2020 balances for these  
12          deferrals. Again, PGE has not yet written off any balances associated with these dockets.

13          Finally, the UM 2115 Wildfire deferral is being considered contemporaneously in UE  
14          408. PGE is affirmatively proposing to write off \$15,460,222 in 2020 deferred balances based  
15          on the earnings test the Commission approved in PGE's 2022 GRC.

16   **Q.   WHAT WAS THE UNSPECIFIED ADJUSTMENT?**

17   A.   The \$6,000,000 unspecified adjustment was a hardcoded amount in PGE's results of  
18          operations.<sup>9</sup> It was not supported by the specific deferral reversals in the back-up data PGE  
19          submitted for its Column (6) adjustments. On its face, this adjustment has the appearance of  
20          being a plug that would force PGE's column (7) earnings to be slightly less than the 9.50%  
21          earnings test threshold. Unless this amount can be tied to a specific deferral, which PGE is  
22          actually writing off, however, I recommend it be excluded from the earnings test calculation.

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<sup>7</sup> See UE 394, PGE/500, Bekkedahl-McFarland/15:16-16:2.

<sup>8</sup> See UE 394, PGE/600, Klotz/5:13-6:11.

<sup>9</sup> See 2020 Results, Tab "p8&9 - Deferral Reversal", Cell "D39".

1 **Q. WHAT AMOUNT OF THE UM 2064 COVID DEFERRAL MIGHT BE WRITTEN-**  
2 **OFF?**

3 A. In Docket RE 186, PGE's quarterly COVID deferral report, it identified the following amounts  
4 being deferred:

**Table 2**  
**PGE Indirect vs. Direct COVID-19 Emergency Deferral Costs**<sup>10</sup>

Direct	
Direct O&M	2,633,771
Benefits	(2,764,171)
Total Direct	(130,400)
Indirect	
Bad Debt Expenses	7,663,306
Late Fee Revenue	2,389,460
Interest	137,161
Total Indirect	10,189,927
Total Covid	10,059,527

5 As can be seen, the indirect COVID costs were more than 100% of the total balance.  
6 The direct costs, net of benefits, on the other hand, were a net benefit to ratepayers. Staff  
7 proposed that an earnings test, and a potential write-off, only apply to the direct costs, net of  
8 benefits. Thus, while it has not yet been determined how these amounts will be recovered,  
9 under Staff's recommendation there is zero probability that PGE will be required to write-off  
10 the COVID-19 Emergency deferral balances. Regardless of how these amounts are ultimately  
11 handled, however, it is not appropriate in this docket to prejudge the potential application of an  
12 earnings test to those balances.

13 **Q. IS IT NECESSARY TO PERFORM EARNINGS TESTS SEQUENTIALLY?**

14 A. Yes. When there are multiple deferrals under consideration for the same year, earnings tests  
15 must, by definition, be performed in a sequence because a write-off of one deferral will impact

<sup>10</sup> See RE 186, PGE March 2022 COVID Report at 1 (May 2, 2022). Note there are minor unreconciled differences between the amounts reported in PGE's Column (7) results and RE 186.



the earnings and earnings tests applicable to subsequent deferrals. Only one deferral can be considered at a time or else the earnings used for other deferrals will be inaccurate. Further, the order can impact which deferrals are written-off and can produce different levels of write-offs and/or refunds where there are different earnings thresholds.

**Q. WHAT IS THE PROPER ORDERING OF DEFERRAL EARNINGS TESTS?**

A. The ordering inherently must be the order that the deferrals are presented to the Commission for amortization. It is improper to prejudge the outcome of future proceedings. Given the evidentiary process, it would be improper to make assumptions about the application of earnings tests to deferrals in other dockets, which the Commission has not yet evaluated. It would also be improper to assume that a balance is being written off if it is not actually being written off.

**Q. WHAT IS THE APPROPRIATE EARNINGS TEST APPLICATION RELATED TO THE BOARDMAN DEFERRAL?**

A. The appropriate earnings test application for the Boardman deferral is detailed in **Table 3**, below.

**Table 3**  
Corrected 2020 Earnings Test For Boardman Deferral Refund

	Pre-Tax NOI	NOI	Rate Base	ROE
Column (5) Results	426,787	378,140	5,037,526	10.40%
Write-off UM 2115 Wildfire Deferral	(15,460)	(11,288)	-	
Results after UM 2115 Wildfire Deferral Write-off	411,327	366,853	5,037,526	9.95%
Refund UM 2119 Boardman Deferral	(13,914)	(10,159)	-	
Results after Boardman Deferral Refund	397,413	356,694	5,037,526	9.55%

Starting with column (5) results, the 2020 UM 2115 Wildfire deferral is written off, which reduces PGE's ROE to 9.95%. The entire balance of the UM 2119 Boardman deferral of \$13,913,955 is subsequently written off, yielding an ROE of 9.55%. Since the ROE after

1 the Boardman deferral refund still exceeds the earnings test threshold of 9.5%, it is necessary  
2 for PGE to refund the entire amount.

3 **Q. WILL PGE STILL BE REQUIRED TO WRITE OFF OTHER DEFERRALS IN**  
4 **ADDITION TO THE BOARDMAN DEFERRAL?**

5 A. While not being considered in this docket, the 2020 balances for the UM 1938 Transportation  
6 Electrification Pilot deferral, the UM 2003 Electric Vehicle Charging deferral, and the UM  
7 2078 Battery Storage deferral would all be subject to a write-off, assuming the Commission  
8 established a 9.5% earnings threshold to those balances. While it is possible the Commission  
9 will make a different determination with respect to those balances, I have detailed that  
10 calculation in **Exhibit AWEC/102**. Further, the exhibit demonstrates that even if the balances  
11 were to be written off prior to the 2020 Boardman deferral, the entire amount of the 2020  
12 Boardman deferral would still be refunded to ratepayers under the established earnings test.

13 **Q. IS IT APPROPRIATE TO ACCRUE INTEREST ON THE BOARDMAN REFUND**  
14 **AMOUNT?**

15 A. Yes. In **Exhibit AWEC/103**, I calculate interest on the 2020 balance, accrued at PGE's  
16 authorized cost of capital through January 1, 2023. During the amortization period, however,  
17 interest is calculated at the modified blended treasury rate. While the interest accruals are not  
18 considered in the earnings test application, they are not to be overlooked. It is appropriate to  
19 ensure that carrying charges are accrued in a consistent manner for all applicable deferrals.

20 **Q. HOW DO YOU RECOMMEND AMORTIZING THE 2020 BOARDMAN DEFERRAL**  
21 **REFUND?**

22 A. I recommend sinking-fund amortization, at the modified blended treasury rate over a one-year  
23 period. If a longer-term amortization is selected, however, I recommend using a longer-term  
24 treasury rate, corresponding to the amortization period, plus 100 basis points.

25 **Q. DOES THIS CONCLUDE YOUR OPENING TESTIMONY?**

26 A. Yes.

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
UE 410**

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC	)
COMPANY,	)
	)
Application Regarding Amortization of	)
Boardman Deferral.	)
_____	)

**EXHIBIT AWEC/101  
QUALIFICATION STATEMENT OF BRADLEY G. MULLINS**

# MW ANALYTICS

Energy & Utility Consulting

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## ABOUT

MW Analytics is the professional consulting practice of Brad Mullins, a consultant and expert witness that represents utility customers in regulatory proceedings before state utility regulators. Brad has sponsored expert witness testimony in over 90 regulatory proceeding encompassing various subject matters, including revenue requirement, regulatory accounting, rate development, and new resource additions. MW Analytics has also assisted clients with informal regulatory, legislative and energy policy matters. In addition to providing regulatory services, MW Analytics also provides advisory, energy marketing and other energy consulting services.

## EDUCATION AND WORK EXPERIENCE

Brad has a Master of Accounting degree from the University of Utah. After obtaining his master's degree, Brad worked as a Tax Consultant at Deloitte Tax in San Jose, California, specialized in research and development credits and deductions. Following Deloitte, Brad worked at PacifiCorp Energy as a Net Power Cost Analyst, responsible for preparing power cost forecasts, preparing testimony for regulatory filings, preparing annual power cost deferral filings, and developing qualifying facility avoided cost calculations.

## REGULATORY APPEARANCES

Brad has sponsored expert witness testimony in the following regulatory proceedings:

Docket	Party	Topics
<u>Application of Sierra Pacific Power Company d/b/a NV Energy for authority to adjust its annual revenue requirement for general rates charged to all classes of electric customers and for relief properly related thereto, PUC Nv. Docket No. 22-06014.</u>	Smart Energy Alliance and Caesars Enterprise Services, LLC	Revenue Requirement
<u>In re PacifiCorp 2021 Power Cost Adjustment Mechanism, Or.PUC Docket No. UE 404.</u>	Alliance of Western Energy Consumers	Power Cost Deferral
<u>In re the Application of Dominion Energy Utah to Increase Distribution Rates and Charges and Make Tariff Modifications Ut.PSC Docket No. 22-057-03</u>	Nucor Steel-Utah	Cost of Service, Rate Spread and Rate Design
<u>In re Joint Application of Nevada Power Company d/b/a NV Energy ("NPC") and Sierra Pacific Power Company d/b/a NV Energy ("SPPC") for approval to merge into a single corporate entity, to transfer Certificates of Public Convenience and Necessity ("CPC") 685 Sub 20, 688, and 688 Sub 6 from SPPC to NPC, and to consolidate generation assets, PUC Nv. Docket No. 22-03028.</u>	Wynn Las Vegas, LLC and Smart Energy Alliance	Merger
<u>In re Puget Sound Energy Requests for a General Rate Revision, Wa.UTC Docket. UE-220026 (cons.).</u>	Alliance of Western Energy Consumers	Revenue Requirement
<u>In re Northwest Natural Gas Company, dba, NW Natural, Updated Depreciation Study Pursuant to OAR 860-027-0350, Or.PUC Docket No. UM 2214.</u>	Alliance of Western Energy Consumers	Depreciation
<u>In re Portland General Electric Company, 2023 Annual Update Tariff, Schedule 125, Or.PUC Docket No. UE 402.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re PacifiCorp d.b.a Pacific Power, Request for a General Rate Revision, Or.PUC Docket No. UE 399.</u>	Alliance of Western Energy Consumers	Revenue Requirement
<u>In re the Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of the cost recovery of the regulatory assets relating to the development and implementation of their Joint Natural Disaster Protection Plan., PUC NV. Docket No. 22-03006.</u>	Alliance of Western Energy Consumers	Single-Issue Rate Filing



Docket	Party	Topics
<u>In re PacifiCorp d.b.a. Pacific Power, 2023 Transition Adjustment Mechanism, Or.PUC Docket No. UE 400.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Cascade Natural Gas Corporation, Request for a General Rate Revision, Wa.UTC Docket No. UG-210755</u>	Alliance of Western Energy Consumers	Revenue Requirement / Cost of Service
<u>In re Northwest Natural Gas Company, dba NW Natural, Request for A General Rate Revision, Or.PUC. Docket No. UG 435</u>	Alliance of Western Energy Consumers	Revenue Requirement / Cost of Service
<u>In re Formal Complaint of Tree Top Inc. against Cascade Natural Gas Corporation, Wa.UTC Docket No. UG-210745</u>	Tree Top, Inc.	Overrun Entitlement
<u>In re Northwest Natural Gas Company, dba NW Natural, Request for Approval of an Affiliated Interest Agreement with Lexington Renewables, LLC, Or.PUC. Docket No. UI 451.</u>	Alliance of Western Energy Consumers	Affiliated Interest
<u>In re Avista Corporation, Request for a General Rate Revision, Or.PUC Docket No. UG 433</u>	Alliance of Western Energy Consumers	Revenue Requirement / Cost of Service
<u>In re PacifiCorp Power Cost Only Rate Case, Wa.UTC Docket No. UE-210402.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re PacifiCorp Limited Issue Rate Filing, Wa.UTC Docket No. UE-210532.</u>	Alliance of Western Energy Consumers	Revenue Requirement / Settlement
<u>In re the Application of Rocky Mountain Power for Authority to Increase Its Rates and Charges in Idaho and Approval of Proposed Electric Service Schedules and Regulations, Id.PUC Case No. PAC-E-21-07.</u>	PacifiCorp Idaho Industrial Customers	Revenue Requirement / Settlement
<u>In re Portland General Electric, Request for a General Rate Revision, Or.PUC Docket No. UE 394.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their Economic Recovery Transportation Electrification Plan for the period 2022-2024, PUC Nv. Docket No. 21-09004</u>	Nevada Resort Association	Transportation Electrification
<u>In re PacifiCorp, dba Pacific Power, 2020 Power Cost Adjustment Mechanism, Or.PUC Docket No. UE 392.</u>	Alliance of Western Energy Consumers	Power Cost Deferral
<u>In re the Application of Rocky Mountain Power for Authority to Decrease Current Rates by \$14.9 Million to Refund Deferred Net Power Costs Under Tariff Schedule 95 Energy Cost Adjustment Mechanism and to Decrease Current Rates by \$166 Thousand Under Tariff Schedule 93, REC and SO2 Revenue Adjustment Mechanism, Wy.PSC Docket No. 20000-599-EM-21.</u>	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re Portland General Electric 2021 Annual Update Tariff Schedule 125, Or. PUC Docket No. UE 391.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Joint Application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of a regulatory asset account to recover costs relating to the development and implementation of their Joint Natural Disaster Protection Plan, PUC NV. Docket No. 21-03004.</u>	Wynn Las Vegas, LLC; Smart Energy Alliance	Single-Issue Rate Filing
<u>In re PacifiCorp d.b.a. Pacific Power, 2022 Transition Adjustment Mechanism, Or.PUC Docket No. UE 390.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re Avista 2020 General Rate Case, Wa.U.T.C. Docket No. UE-200900 (Cons.)</u>	Alliance of Western Energy Consumers	Revenue Requirement
<u>In re NV Energy's Fourth Amendment to Its 2018 Joint Integrated Resource Plan, PUC Nv. Docket No 20-07023.</u>	Wynn Las Vegas, LLC; Smart Energy Alliance	Transmission Planning
<u>In Re Cascade Natural Gas Corporation, 2020 General Rate Case, Wa.U.T.C. Docket No. UG-200568</u>	Alliance of Western Energy Consumers	Revenue Requirement
<u>In re Cascade Natural Gas Corporation, Petition to File Depreciation Study, Or.PUC Docket No. UM 2073</u>	Alliance of Western Energy Consumers	Depreciation Rates
<u>In re the Application of Rocky Mountain Power for Authority to Increase Current Rates By \$7.4 Million to Recover Deferred Net Power Costs Under Tariff Schedule 95 Energy Cost Adjustment Mechanism and to Decrease Current Rates by \$604 Thousand Under Tariff Schedule 93, Rec and So2 Revenue Adjustment Mechanism, Wy.PSC Docket No. 20000-582-EM-20</u>	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re the Complaint of Willamette Falls Paper Company and West Linn Paper Company against Portland General Electric Company, Or.PUC Docket No. UM 2107</u>	Willamette Falls Paper Company	Consumer Direct Access, Tariff Dispute
<u>In re The Application of Rocky Mountain Power for Authority to Increase its Retail Electric Service Rates by Approximately \$7.1 Million Per Year or 1.1 Percent, to Revise the Energy</u>	Wyoming Industrial Energy Consumers	Power Cost Modeling



Docket	Party	Topics
<u>Cost Adjustment Mechanism, and to Discontinue Operations at Cholla Unit 4, Wy.PSC Docket No. 2000-578-ER-20</u>		
<u>Avista Corporation 2021 General Rate Case, Or.PUC Docket No. UG 389</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re NW Natural Request for a General Rate Revision, Or.PUC Docket No. UG 388.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re PacifiCorp. Request to Initiate an Investigation of Multi-Jurisdictional Issues and Approve an Inter-Jurisdictional Cost Allocation Protocol, Or.PUC, UM 1050.</u>	Alliance of Western Energy Consumers	Jurisdictional Allocation
<u>In re Puget Sound Energy 2019 General Rate Case, Wa.UTC Docket No. UE 190529.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Coal Retirement Costs
<u>Avista Corporation 2020 General Rate Case, Wa.UTC Docket No. UE-190334 (Cons.)</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Cascade Natural Gas Corporation Application for Approval of a Safety Cost Recovery Mechanism, Or. PUC Docket No. UM 2026.</u>	Alliance of Western Energy Consumers	Ratemaking Policy
<u>In re Avista Corporation. Request for a General Rate Revision, Or.PUC Docket No. UG 366.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Portland General Electric, 2020 Annual Update Tariff (Schedule 125), Or.PUC Docket No UE 359.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re PacifiCorp 2020 Transition Adjustment Mechanism, Or.PUC Docket No. UE 356.</u>	Alliance of Western Energy Consumers	Power Cost Modeling
<u>In re PacifiCorp 2020 Renewable Adjustment Clause, Or.PUC Docket No. UE 352.</u>	Alliance of Western Energy Consumers	Single-Issue Rate Filing
<u>2020 Joint Power and Transmission Rate Proceeding, Bonneville Power Administration, Case No. BP-20.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Policy
<u>In the Matter of the Application of MSG Las Vegas, LLC for a Proposed Transaction with a Provider of New Electric Resources, PUC Nv. Docket No. 18-10034</u>	Madison Square Garden	Customer Direct Access
<u>Puget Sound Energy 2018 Expedited Rate Filing, Wa.UTC Dockets UE-180899/UG-180900 (Cons.).</u>	Alliance of Western Energy Consumers	Revenue Requirement, Settlement
<u>Georgia Pacific Gypsum LLC's Application to Purchase Energy, Capacity, and/or Ancillary Services from a Provider of New Electric Resources, PUC Nv. Docket No. 18-09015.</u>	Georgia Pacific	Customer Direct Access
<u>Joint Application of Nevada Power Company d/b/a NV Energy for approval of their 2018-2038 Triennial Integrated Resource Plan and 2019-2021 Energy Supply Plan, PUCN Docket No. 18-06003.</u>	Smart Energy Alliance	Resource Planning
<u>In re Cascade Natural Gas Corporation Request for a General Rate Revision, Or.PUC, Docket No. UE 347.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company Request for a General Rate Revision, Or.PUC Docket No UE 335.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Northwest Natural Gas Company, dba NW Natural, Request for a General Rate Revision, Or.PUC Docket No. UG 344.</u>	Alliance of Western Energy Consumers	Revenue Requirement, Rate Design
<u>In re Cascade Natural Gas Corporation Request for a General Rate Revision, Wa.UTC, Docket No. UE-170929.</u>	Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>In the Matter of Hydro One Limited, Application for Authorization to Exercise Substantial Influence over the Policies and Actions of Avista Corporation, Or.PUC, Docket No. UM 1897.</u>	Alliance of Western Energy Consumers	Merger
<u>Application of Rocky Mountain Power for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of Resource Decision, Ut.PSC Docket No. 17-035-40</u>	Utah Industrial Energy Consumers, & Utah Associated Energy Users	New Resource Addition
<u>In re PacifiCorp, dba Rocky Mountain Power, for a CPCN and Binding Ratemaking Treatment for New Wind and Transmission Facilities, Id.PUC Case No. PAC-E-17-07</u>	PacifiCorp Idaho Industrial Customers	New Resource Addition
<u>In re PacifiCorp, dba Pacific Power, 2016 Power Cost Adjustment Mechanism, Or.PUC, Docket No. UE 327.</u>	Alliance of Western Energy Consumers	Power Cost Deferral



Docket	Party	Topics
<u>In re PacifiCorp 2016 Power Cost Adjustment Mechanism</u> , Wa.UTC Docket No. UE-170717	Boise Whitepaper, LLC	Power Cost Deferral
<u>In re Avista Corporation 2018 General Rate Case</u> , Wa.UTC Dockets UE-170485 and UG-170486 (Consolidated).	Industrial Customers of Northwest Utilities, & Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>Application of Nevada Power Company d/b/a NV Energy for authority to adjust its annual revenue requirement for general rates charged to all classes of electric customers and for relief properly related thereto</u> , PUCN. Docket No. 17-06003.	Smart Energy Alliance	Revenue Requirement
<u>In re the Application of Rocky Mountain Power for Authority to Decrease Current Rates by \$15.7 Million to Refund Deferred Net Power Costs Under Tariff Schedule 95 Energy Cost Adjustment Mechanism and to Decrease Current Rates By \$528 Thousand Under Tariff Schedule 93, REC and SO2 Revenue Adjustment Mechanism</u> , Wy. PSC, Docket No. 20000-514-EA-17 (Record No. 14696).	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re the 2018 General Rate Case of Puget Sound Energy</u> , Wa.UTC, Docket No. UE-170033 (Cons.).	Industrial Customers of Northwest Utilities, & Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>In re PacifiCorp, dba Pacific Power, 2018 Transition Adjustment Mechanism</u> , Or.PUC, Docket No. UE 323.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, Request for a General Rate Revision</u> , Or.PUC, Docket No. UE 319.	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company, Application for Transportation Electrification Programs</u> , Or.PUC, UM 1811.	Industrial Customers of Northwest Utilities	Electric Vehicle Charging
<u>In re Pacific Power &amp; Light Company, Application for Transportation Electrification Programs</u> , Or.PUC, Docket No. UM 1810.	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>In re the Public Utility Commission of Oregon, Investigation to Examine PacifiCorp, dba Pacific Power's Non-Standard Avoided Cost Pricing</u> , Or.PUC, Docket No. UM 1802.	Industrial Customers of Northwest Utilities	Qualifying Facilities
<u>In re Pacific Power &amp; Light Co., Revisions to Tariff WN U-75, Advice No. 16-05, to modify the Company's existing tariffs governing permanent disconnection and removal procedures</u> , Wa.UTC, Docket No. UE-161204.	Boise Whitepaper, LLC	Customer Direct Access
<u>In re Puget Sound Energy's Revisions to Tariff WN U-60, Adding Schedule 451, Implementing a New Retail Wheeling Service</u> , Wa.UTC, Docket No. UE-161123.	Industrial Customers of Northwest Utilities	Customer Direct Access
<u>2018 Joint Power and Transmission Rate Proceeding</u> , Bonneville Power Administration, Case No. BP-18.	Industrial Customers of Northwest Utilities	Revenue Requirement, Policy
<u>In re Portland General Electric Company Application for Approval of Sale of Harborton Restoration Project Property</u> , Or.PUC, Docket No. UP 334 (Cons.).	Industrial Customers of Northwest Utilities	Environmental Deferral
<u>In re An Investigation of Policies Related to Renewable Distributed Electric Generation</u> , Ar.PSC, Matter No. 16-028-U.	Arkansas Electric Energy Consumers	Net Metering
<u>In re Net Metering and the Implementation of Act 827 of 2015</u> , Ar.PSC, Matter No. 16-027-R.	Arkansas Electric Energy Consumers	Net Metering
<u>In re the Application of Rocky Mountain Power for Approval of the 2016 Energy Balancing Account</u> , Ut.PSC, Docket No. 16-035-01	Utah Associated Energy Users	Power Cost Deferral
<u>In re Avista Corporation Request for a General Rate Revision</u> , Wa.UTC, Docket No. UE-160228 (Cons.).	Industrial Customers of Northwest Utilities, & Northwest Industrial Gas Users	Revenue Requirement, Rate Design
<u>In re the Application of Rocky Mountain Power to Decrease Current Rates by \$2.7 Million to Recover Deferred Net Power Costs Pursuant to Tariff Schedule 95 and to Increase Rates by \$50 Thousand Pursuant to Tariff Schedule 93</u> , Wy.PSC, Docket No. 20000-292-EA-16.	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>In re PacifiCorp, dba Pacific Power, 2017 Transition Adjustment Mechanism</u> , Or.PUC, Docket No. UE 307.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, 2017 Annual Power Cost Update Tariff (Schedule 125)</u> , Or.PUC, Docket No. UE 308.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Pacific Power &amp; Light Company, General rate increase for electric services</u> , Wa.UTC, Docket No. UE-152253.	Boise Whitepaper, LLC	Revenue Requirement, Rate Design
<u>In The Matter of the Application of Rocky Mountain Power for Authority of a General Rate Increase in Its Retail Electric Utility Service Rates in Wyoming of \$32.4 Million Per Year or 4.5 Percent</u> , Wy.PSC, Docket No. 20000-469-ER-15.	Wyoming Industrial Energy Consumers	Power Cost Modeling



Docket	Party	Topics
<u>In re Avista Corporation, General Rate Increase for Electric Services</u> , Wa.UTC, Docket No. UE-150204.	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re the Application of Rocky Mountain Power to Decrease Rates by \$17.6 Million to Recover Deferred Net Power Costs Pursuant to Tariff Schedule 95 to Decrease Rates by \$4.7 Million Pursuant to Tariff Schedule 93</u> , Wy.PSC, Docket No. 20000-472-EA-15.	Wyoming Industrial Energy Consumers	Power Cost Deferral
<u>Formal complaint of The Walla Walla Country Club against Pacific Power &amp; Light Company for refusal to provide disconnection under Commission-approved terms and fees, as mandated under Company tariff rules</u> , Wa.UTC, Docket No. UE-143932.	Columbia Rural Electric Association	Customer Direct Access / Customer Choice
<u>In re PacifiCorp, dba Pacific Power, 2016 Transition Adjustment Mechanism</u> , Or.PUC, Docket No. UE 296.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, Request for a General Rate Revision</u> , Or.PUC, Docket No. UE 294.	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company and PacifiCorp dba Pacific Power, Request for Generic Power Cost Adjustment Mechanism Investigation</u> , Or.PUC, Docket No. UM 1662.	Industrial Customers of Northwest Utilities	Power Cost Deferral
<u>In re PacifiCorp, dba Pacific Power, Application for Approval of Deer Creek Mine Transaction</u> , Or.PUC, Docket No. UM 1712.	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>In re Public Utility Commission of Oregon, Investigation to Explore Issues Related to a Renewable Generator's Contribution to Capacity</u> , Or.PUC, Docket No. UM 1719.	Industrial Customers of Northwest Utilities	Resource Planning
<u>In re Portland General Electric Company, Application for Deferral Accounting of Excess Pension Costs and Carrying Costs on Cash Contributions</u> , Or.PUC, Docket No. UM 1623.	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>2016 Joint Power and Transmission Rate Proceeding</u> , Bonneville Power Administration, Case No. BP-16.	Industrial Customers of Northwest Utilities	Revenue Requirement, Policy
<u>In re Puget Sound Energy, Petition to Update Methodologies Used to Allocate Electric Cost of Service and for Electric Rate Design Purposes</u> , Wa.UTC, Docket No. UE-141368.	Industrial Customers of Northwest Utilities	Cost of Service
<u>In re Pacific Power &amp; Light Company, Request for a General Rate Revision Resulting in an Overall Price Change of 8.5 Percent, or \$27.2 Million</u> , Wa.UTC, Docket No. UE-140762.	Boise Whitepaper, LLC	Revenue Requirement, Rate Design
<u>In re Puget Sound Energy, Revises the Power Cost Rate in WN U-60, Tariff G, Schedule 95, to reflect a decrease of \$9,554,847 in the Company's overall normalized power supply costs</u> , Wa.UTC, Docket No. UE-141141.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re the Application of Rocky Mountain Power for Authority to Increase Its Retail Electric Utility Service Rates in Wyoming Approximately \$36.1 Million Per Year or 5.3 Percent</u> , Wy.PSC, Docket No. 20000-446-ER-14.	Wyoming Industrial Energy Consumers	Power Cost Modeling
<u>In re Avista Corporation, General Rate Increase for Electric Services, RE, Tariff WN U-28, Which Proposes an Overall Net Electric Billed Increase of 5.5 Percent Effective January 1, 2015</u> , Wa.UTC, Docket No. UE-140188.	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design, Power Costs
<u>In re PacifiCorp, dba Pacific Power, Application for Deferred Accounting and Prudence Determination Associated with the Energy Imbalance Market</u> , Or.PUC, Docket No. UM 1689.	Industrial Customers of Northwest Utilities	Single-issue Ratemaking
<u>In re PacifiCorp, dba Pacific Power, 2015 Transition Adjustment Mechanism</u> , Or.PUC, Docket No. UE 287.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company, Request for a General Rate Revision</u> , Or.PUC, Docket No. UE 283.	Industrial Customers of Northwest Utilities	Revenue Requirement, Rate Design
<u>In re Portland General Electric Company's Net Variable Power Costs (NVPC) and Annual Power Cost Update (APCU)</u> , Or.PUC, Docket No. UE 286.	Industrial Customers of Northwest Utilities	Power Cost Modeling
<u>In re Portland General Electric Company 2014 Schedule 145 Boardman Power Plant Operating Adjustment</u> , Or.PUC, Docket No. UE 281.	Industrial Customers of Northwest Utilities	Coal Retirement
<u>In re PacifiCorp, dba Pacific Power, Transition Adjustment, Five-Year Cost of Service Opt-Out (adopting testimony of Donald W. Schoenbeck)</u> , Or.PUC, Docket No. UE 267.	Industrial Customers of Northwest Utilities	Customer Direct Access



**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
UE 410**

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC	)
COMPANY,	)
	)
Application Regarding Amortization of	)
Boardman Deferral.	)
_____	)

**EXHIBIT AWEC/102  
UM 2119 BOARDMAN DEFERRAL EARNINGS TEST**

UM 2119 Boardman Deferral Earnings Test (\$000)

Line	Description	Revenue Requirement @ Authorized ROE				Earnings Impact of Write-Offs / Refunds			
		Net Oper. Income	Rate Base	Rev. Req. Def. / (Suf.)	ROE %	Pre-Tax Net Oper. Income	Net Oper. Income	Rate Base	Rev. Req. Def. / (Suf.)
1	<b>Apr. 29, 2022 Revised Results</b>								
2	<b>Column (5)</b>	<b>\$378,140</b>	<b>\$5,037,526</b>	<b>(32,103)</b>	<b>10.40%</b>				
<u>Write-Offs / Refunds</u>									
3	Wildfire Deferral	\$366,853	\$5,037,526	(16,134)	9.95%	(15,460)	(11,288)	-	15,969
4	Boardman Deferral Refund	\$356,694	\$5,037,526	(1,763)	9.55%	(13,914)	(10,159)	-	14,372
5	<b>Adjusted Results After Boardman Refund</b>	<b>\$356,694</b>	<b>\$5,037,526</b>	<b>(1,763)</b>	<b>9.55% *</b>	<b>(29,374)</b>	<b>(21,447)</b>	<b>-</b>	<b>30,341</b>
<u>Other Necessary Write-Offs / Refunds</u>									
6	UM 1938 TE Pilots	\$356,561	\$5,037,526	(1,575)	9.54%	(182)	(133)	-	188
7	UM 2003 EV Charging	\$356,499	\$5,037,526	(1,487)	9.54%	(85)	(62)	-	88
8	UM 2078 Battery Storage	\$356,486	\$5,037,526	(1,468)	9.54%	(18)	(13)	-	18

\*Exceeds 9.5% earnings threshold; therefore no earnings test deduction required.

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
UE 410**

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC	)
COMPANY,	)
	)
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Boardman Deferral.	)
_____	)

**EXHIBIT AWEC/103  
BOARDMAN 2020 DEFERRAL BALANCE PLUS INTEREST**

1	Depreciation Expense	AWEC DR 32	29,209,000
2	Labor O&M		11,674,504
3	Non-Labor O&M	\	17,645,453
4	Property Taxes	([8]+[9])*1.45%	522,387
5	Tax Benefit of Int.	-[12]*[18]*50%*[20]	(388,421)
6	Tax Expense	Sum([1]:[4])*[20]	(16,033,217)
7	<b>Net Operating Income</b>	Sum([1]:[6])	<b>42,629,706</b>
8	Gross Plant	AWEC DR 32	515,948,390
9	Accumulated Depreciation		(479,921,727)
10	Accumulated Deferred Tax		14,434,882
11	Fuel Stock	\	5,639,588
12	<b>Total Rate Base</b>	Sum([8]:[11])	<b>56,101,133</b>
13	Required Return	[12]*[19]	4,095,383
14	Post-Tax Rev. Req.	[13]+[7]	46,725,088
15	<b>Pre-Tax Rev. Req. / Year</b>	[14]/[21]	<b>66,261,494</b>
16	Cost of Capital:		
17	Equity	UE 335 1st Stlmnt.	9.50%
18	Debt		5.10%
19	Cost of Capital @ 50/50	\	7.30%
20	Tax Rate	UE 335 Wrkpprs.	0.2715
21	Revenue Conversion Factor	\	0.7052

Calculation of Boardman Deferral and Amortization

Month	Beg.Balance	Accural	Amortization	Interest Rate	Interest	Ending Balance
10/1/2020	-	2,760,896		7.30%	8,398	2,769,293
11/1/2020	2,769,293	5,521,791		7.30%	33,642	8,324,726
12/1/2020	8,324,726	5,521,791		7.30%	67,438	13,913,955
1/1/2021	13,913,955			7.30%	84,643	13,998,598
2/1/2021	13,998,598			7.30%	85,158	14,083,756
3/1/2021	14,083,756			7.30%	85,676	14,169,433
4/1/2021	14,169,433			7.30%	86,197	14,255,630
5/1/2021	14,255,630			7.30%	86,722	14,342,352
6/1/2021	14,342,352			7.30%	87,249	14,429,601
7/1/2021	14,429,601			7.30%	87,780	14,517,381
8/1/2021	14,517,381			7.30%	88,314	14,605,695
9/1/2021	14,605,695			7.30%	88,851	14,694,547
10/1/2021	14,694,547			7.30%	89,392	14,783,938
11/1/2021	14,783,938			7.30%	89,936	14,873,874
12/1/2021	14,873,874			7.30%	90,483	14,964,357
1/1/2022	14,964,357			7.30%	91,033	15,055,390
2/1/2022	15,055,390			7.30%	91,587	15,146,977
3/1/2022	15,146,977			7.30%	92,144	15,239,121
4/1/2022	15,239,121			7.30%	92,705	15,331,826
5/1/2022	15,331,826			7.30%	27,078	15,358,904
5/9/2022	15,358,904			6.81%	61,879	15,420,783
6/1/2022	15,420,783			6.81%	87,545	15,508,328
7/1/2022	15,508,328			6.81%	88,042	15,596,370
8/1/2022	15,596,370			6.81%	88,542	15,684,912
9/1/2022	15,684,912			6.81%	89,045	15,773,957
10/1/2022	15,773,957			6.81%	89,550	15,863,507
11/1/2022	15,863,507			6.81%	90,058	15,953,565
12/1/2022	15,953,565			6.81%	90,570	16,044,135
1/1/2023	16,044,135		(1,350,229)	1.82%	24,334	14,718,240
2/1/2023	14,718,240		(1,350,229)	1.82%	22,323	13,390,334
3/1/2023	13,390,334		(1,350,229)	1.82%	20,309	12,060,414
4/1/2023	12,060,414		(1,350,229)	1.82%	18,292	10,728,477
5/1/2023	10,728,477		(1,350,229)	1.82%	16,272	9,394,520
6/1/2023	9,394,520		(1,350,229)	1.82%	14,248	8,058,540
7/1/2023	8,058,540		(1,350,229)	1.82%	12,222	6,720,534
8/1/2023	6,720,534		(1,350,229)	1.82%	10,193	5,380,498
9/1/2023	5,380,498		(1,350,229)	1.82%	8,160	4,038,430
10/1/2023	4,038,430		(1,350,229)	1.82%	6,125	2,694,326
11/1/2023	2,694,326		(1,350,229)	1.82%	4,086	1,348,184
12/1/2023	1,348,184		(1,350,229)	1.82%	2,045	0
<b>1/1/2024</b>	<b>0</b>					

Total Amortization / Year (16,202,743)

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON  
UE 410**

In the Matter of	)
	)
PORTLAND GENERAL ELECTRIC	)
COMPANY,	)
	)
Application Regarding Amortization of	)
Boardman Deferral.	)
_____	)

**EXHIBIT AWEC/104  
PGE'S FLAWED EARNINGS TEST CALCULATION**

**PGE Proposed UM 2119 Boardman Deferral Earnings Test (\$000)**

Line	Description	Revenue Requirement @ Authorized ROE				Impact of Write-Offs / Refunds			
		Net Oper. Income	Rate Base	Rev. Req. Def. / (Suf.)	ROE %	Pre-Tax Net Oper. Income	Net Oper. Income	Rate Base	Rev. Req. Def. / (Suf.)
1	<b>Apr. 29, 2022 Revised Results</b>								
2	<b>Column (5)</b>	\$378,140	\$5,037,526	(32,103.247)	10.40%				
<i>PGE Assumed Write-Offs</i>									
3	UM 1938 TE Pilots*	\$378,008	\$5,037,526	(31,915)	10.39%	(182)	(133)	-	188
4	UM 2003 EV Charging*	\$377,945	\$5,037,526	(31,827)	10.39%	(85)	(62)	-	88
5	UM 2064 COVID Deferral*	\$370,470	\$5,037,526	(21,252)	10.09%	(10,239)	(7,475)	-	10,575
6	UM 2078 Battery Storage*	\$370,457	\$5,037,526	(21,233)	10.09%	(18)	(13)	-	18
7	UM 2115 Wildfire Deferral	\$359,169	\$5,037,526	(5,265)	9.65%	(15,460)	(11,288)	-	15,969
8	Unspecified Adjustment*	\$354,788	\$5,037,526	933	9.47%	(6,000)	(4,381)	-	6,197
9	<b>Adjusted Results Before Boardman Refund</b>	<b>\$354,788</b>	<b>\$5,037,526</b>	<b>933</b>	<b>9.47%</b>	<b>(31,984)</b>	<b>(23,352)</b>	<b>-</b>	<b>33,036</b>
10	UM 2119 Boardman Deferral Refund	\$344,630	\$5,037,526	15,304	9.07%	(13,914)	(10,159)	-	15,304

\* These amounts are not actually being written off. Therefore it was inappropriate to include them as a write-off in the earnings test calculation