

October 20, 2023

TO: Alison Lackey, Administrative Law Judge
Public Utility Commission of Oregon

FROM: Jaki Ferchland
Manager, Revenue Requirement

**PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-1
Dated October 18, 2023**

Request:

Refer to Stipulating Parties/403 (bill impacts provided with the sixth partial stipulation) and PGE's **revised** response to bench request 3-1, Attachment A (bill impacts resulting from the stipulations in this docket, including the October 2 MONET update). Provide a complete and detailed narrative explanation of the reasons for the differences between the bill impacts provided in Stipulating Parties/403 and PGE's **revised** response to bench request 3-1, Attachment A.

Response:

Please see response to Bench Request No. 5-2.

October 20, 2023

TO: Alison Lackey, Administrative Law Judge
Public Utility Commission of Oregon

FROM: Jaki Ferchland
Manager, Revenue Requirement

PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-2
Dated October 18, 2023

Request:

Refer to Stipulating Parties/403 (bill impacts provided with the sixth partial stipulation) and PGE's **revised** response to bench request 3-1, Attachment A (bill impacts resulting from the stipulations in this docket, including the October 2 MONET update). Provide separate detailed explanations of each of the following observed differences between.

- a. Current revenues of \$2,376,583,530 in Stipulating Parties/403 and current revenues of \$2,376,009,252 in **revised** response to bench request 3-1 (decrease of \$574,278).
- b. Proposed revenues of \$2,731,950,268 in Stipulating Parties/403 and proposed revenues of **\$2,734,463,024 in revised** response to bench request 3-1 (increase of **\$2,512,756**).

Response:

- a. The difference in current revenues of \$2,376,583,530 in Stipulating Parties/403 and current revenues of \$2,376,009,252 in PGE's **revised** response to bench request 3-1 (decrease of \$574,278) is due to the employee discount being calculated at the agreed upon 15% allowable recovery but should have been calculated at the current 25% allowable recovery.
- b. The difference in proposed revenues of \$2,731,950,268 in Stipulating Parties/403 and proposed revenues of **\$2,734,463,024 in revised** response to bench request 3-1 (increase of **\$2,512,756**) is due to the following increases in the revenue requirement:
 - \$1.3 million related to indirect capital loadings. PGE agreed in a stipulation in UE 412 to move indirect loadings out of Schedule 151 and into base rates.
 - \$1.2 million for Energy Efficiency Customer Service which is currently collected via Schedule 110 but under term 18 of the sixth partial stipulation to be included in base rates beginning in 2024.

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TO: Alison Lackey, Administrative Law Judge
Public Utility Commission of Oregon

FROM: Jaki Ferchland
Manager, Revenue Requirement

PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-3
Dated October 18, 2023

Request:

Refer to PGE's response to Bench Request 3-1(a)(noting that "wildfire mitigation amounts are included within current revenues, but not proposed revenues" and Stipulating Parties/403 ("amounts and percentages do not include wildfire mitigation costs"). Please confirm the treatment of wildfire mitigation revenues in each table.

- i. Confirm that wildfire mitigation revenues are excluded from both current and proposed revenues in Stipulating Parties/403.
- ii. Confirm that wildfire mitigation revenues are included in the current revenues in PGE's **revised** response to bench request 3-1, Attachment A, and are excluded from proposed revenues in PGE's **revised** response to bench request 3-1, Attachment A.
- iii. Please provide a detailed explanation of how the wildfire mitigation costs were removed from general rates for recovery via Schedule 151, addressing with specificity how each capital and O&M expenses were adjusted.

Response:

- i. No. Wildfire mitigation revenues are included in the current revenues in Stipulating Parties/403, as they were included in PGE's base rates for UE 394. Wildfire mitigation revenues are also included as part of the current revenues reflected in PGE's response to OPUC Bench Request No. 4-1, Attachment A. They are, however, excluded from the proposed revenues provided in both Stipulating Parties/403 and PGE's response to OPUC Bench Request No. 4-1, Attachment A, pursuant to the outcome in UE 412, as adopted in Commission Order No. 23-370. Refer to PGE's response to OPUC Bench Request No. 4-2 for an estimate of wildfire mitigation amounts included in current revenues.
- ii. Yes. Wildfire mitigation revenues are included in the current revenues in PGE's **revised** response to Bench Request No. 3-1, Attachment A, and are excluded from proposed revenues in PGE's **revised** response to Bench Request No. 3-1, Attachment

- A. Similarly, wildfire mitigation revenues are included in the current revenues and excluded from proposed revenues in PGE's response to OPUC Bench Request No. 4-1, Attachment A.
- iii. PGE's initial filed revenue requirement in this proceeding as provided in the PGE Exhibit 200 work papers "Exhibit Support_2024" and "2024 Unbundled ROO" provided an isolated integrated and unbundled revenue requirement for all 2024 forecasted wildfire mitigation O&M and forecast capital and capital related costs (e.g., depreciation expense, property tax, etc.) assuming December 31, 2023 plant balances. These costs were identified and isolated by using specific wildfire mitigation account work orders. Since isolating these amounts from the initial UE 416 request, the only changes have been to:
- 1) update for stipulated revenue sensitive items that would impact the isolated revenue requirement (i.e., cost of capital and uncollectibles rate), and
 - 2) move approximately \$1.3 million from the isolated wildfire mitigation revenue requirement back to base rates to reflect the UE 412 stipulation in which parties agreed PGE would move indirect loadings out of Schedule 151 and into base rates.

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Public Utility Commission of Oregon

FROM: Jaki Ferchland
Manager, Revenue Requirement

PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-4
Dated October 18, 2023

Request:

Refer to Order No. 23-039, Modified General Protective Order, Appendix A at 1 ("The party should make reasonable efforts to designate as Protected Information only the portions of the information covered by ORCP 36(C)(1)") and PGE's response to bench request 3-1, Attachment B (Table 4, projected increase to overall customer rates effective January 1, 2024).

- a. Please provide a revised version of PGE's response to bench request 3-1, Attachment B redacting only the information covered by ORCP 36(c)(1).
- b. For any information redacted in the response to (a), provide an explanation for how the redacted information falls within the scope of ORCP 36(C)(1).

Response:

- a. Attachment BR 5-4A provides a revised version of PGE's response to bench request 3-1, Attachment B, redacting only the information covered by ORCP 36(c)(1).
- b. Bench Request 3-1b seeks the total projected increase to overall customer rates effective January 1, 2024, inclusive of all other rate adjustments "anticipated or proposed" that are outside of this docket. Certain rate adjustments that are outside of the general rate case are standard annual updates that are typically filed for Commission-approval in November. PGE has not yet completed the final calculations for these annual updates, submitted advice filings for these tariffs, nor received Commission-approval for the annual updates to go into effect on January 1, 2024. The estimates for these supplemental filings are still at the forecast stage. When provided in an overall customer rate increase impact percentage, the forecast presents commercially sensitive information under ORCP 36(C)(1) since they can influence the actions of others if disclosed that may harm the company or customers. The redacted columns in BR5-4 Attachment A provide commercially sensitive information protected under ORCP 36(C)(1) for the reasons previously mentioned.

**TABLE 4
PORTLAND GENERAL ELECTRIC
ESTIMATED EFFECT ON CONSUMERS' TOTAL ELECTRIC BILLS
2024**

Forecast
Sept 23E24

~~TOTAL ELECTRIC BILLS~~
CURRENT PROPOSED

BEGIN CONFIDENTIAL

CATEGORY	RATE SCHEDULE	CUSTOMERS	MWH SALES	all supplementals except LIA & PPC	all supplementals except LIA & PPC	Change	
						AMOUNT	PCT.
Residential	7	824,079	7,839,840	\$1,255,690,503			
Employee Discount				(\$1,449,438)			
Subtotal				\$1,254,241,066			
Outdoor Area Lighting	15	0	13,185	\$3,888,323			
General Service <30 kW	32	95,930	1,555,680	\$243,249,533			
Opt. Time-of-Day G.S. >30 kW	38	336	26,908	\$4,494,550			
Irrig. & Drain. Pump. < 30 kW	47	2,746	20,557	\$5,195,311			
Irrig. & Drain. Pump. > 30 kW	49	1,368	59,473	\$11,776,071			
General Service 31-200 kW	83	11,308	2,893,468	\$355,306,355			
General Service 201-4,000 kW							
Secondary	85-S	1,322	2,065,692	\$214,529,545			
Primary	85-P	179	634,079	\$57,852,594			
Schedule 89 > 4 MW							
Primary	89-P	17	858,148	\$69,819,600			
Subtransmission	89-T/75-T	3	35,262	\$3,401,259			
Schedule 90	90-P	7	3,551,713	\$261,653,358			
Street & Highway Lighting	91/95	189	37,529	\$13,257,044			
Traffic Signals	92	16	2,712	\$248,501			
COS TOTALS		937,500	19,594,245	\$2,498,913,111			
Direct Access Service 201-4,000 kW							
Secondary	485-S	214	434,217	\$10,597,432			
Primary	485-P	52	312,499	\$6,874,857			
Direct Access Service > 4 MW							
Primary	489-P	16	1,027,289	\$12,463,272			
Subtransmission	489-T	3	266,763	\$2,480,506			
New Load Direct Access Service > 10MW							
Primary	689-P	4	175,441	\$2,939,002			
DIRECT ACCESS TOTALS		288	2,216,210	35,355,069			
COS AND DA CYCLE TOTALS		937,788	21,810,454	\$2,534,268,180			

END CONFIDENTIAL

October 20, 2023

TO: Alison Lackey, Administrative Law Judge
Public Utility Commission of Oregon

FROM: Jaki Ferchland
Manager, Revenue Requirement

PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-5
Dated October 18, 2023

Request:

Refer to Order No. 23-039, Modified General Protective Order, Appendix A at 1 ("The party should make reasonable efforts to designate as Protected Information only the portions of the information covered by ORCP 36(C)(1)") and PGE's response to bench request 3-2, Attachment A (separate rate adjustment changes proposed effective January 1, 2024).

- a. Please provide a revised version of PGE's response to bench request 3-2, Attachment A redacting only the information covered by ORCP 36(c)(1).
- b. For any information redacted in the response to (a), provide an explanation for how the redacted information falls within the scope of ORCP 36(C)(1).

Response:

- a. Attachment BR 5-5A provides a revised version of PGE's response to bench request 3-2, Attachment A redacting only the information covered by ORCP 36(C)(1).
- b. Attachment BR5-5A provides each separate rate adjustment outside of this docket (*i.e.*, schedule, AAC, amortization, or other rate adjustment) proposed to change on January 1, 2024. When provided in an overall customer rate increase impact percentage, the forecast presents commercially sensitive information under ORCP 36(C)(1) since the rate increase forecast can influence the actions of others if disclosed, which may harm the company or customers. The redacted columns in BR5-5 Attachment A provide commercially sensitive information protected under ORCP 36(C)(1) for the reasons previously mentioned.

Estimated Jan 1, 2024-Supplemental Schedules Rate Adjustments

BEGIN CONFIDENTIAL

	Revenue change	% Change
Schedule 146	Colstrip Adjustment	
Schedule 145	Boardman Decommissioning	
Schedule 105	Regulatory Adjustments	
Schedule 110	Energy Efficiency Customer Service	Moves to base rates in GRC
Schedule 118	Bill Adjustment Cost Recovery	
Schedule 123	Decoupling Adjustment	
Schedule 135	Demand Response Cost Recovery	
Schedule 136	Community Solar Cost Recovery	
Schedule 137	Solar Payment Option Cost Recovery	
Schedule 138	Energy Storage Cost Recovery	
Schedule 150	Transportation Electrification Cost Recovery	
Schedule 151	Wildfire Mitigation Cost Recovery	Removed from base rates in GRC, assumes approval of PGE Advice No. 23-08 at Oct. 17 public meeting as basis for current prices.
Schedule 153	CBAIG Cost Recovery	
Total		

END CONFIDENTIAL

October 20, 2023

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Manager, Revenue Requirement

PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-6
Dated October 18, 2023

Request:

Refer to PGE's response to bench request 3-1, Attachment B (Table 4, projected increase to overall customer rates effective January 1, 2024), currently designated as confidential. **BEGIN CONFIDENTIAL**

[REDACTED]

END

CONFIDENTIAL For each, please confirm whether there is a proposed rate adjustment for effect January 1, 2024, and the change associated with each, expressed both in dollar and percentage terms. To the extent that the referenced information is deemed non-confidential in response to 5-4, above, please provide this as a non-redacted response.

Response:

LIA references Low-Income Assistance, Schedule 115. PPC refers to Public Purpose Charge Schedule 108.

PGE confirms that there will be a proposed rate adjustment for the LIA Schedule 115 since it decreasing January 1, 2024, by approximately \$6.7 million dollars (0.5%). This is due to the ending of the temporary \$10 million statewide collections over two years mandated in House Bill 2339 (2021 regular session), which provides additional low-income bill payment assistance during the pandemic. Additionally, PGE has adjusted the flat usage amount on which the residential charge for LIA in schedule 115 is calculated to recognize a 2024 average residential use per customer of 795 kWh, consistent with term six of the fourth partial stipulation. PPC Schedule 108 will not change for January 1, 2024.

Attachment 5-6A provides projected overall changes to customer rates effective January 1, 2024, with the LIA decrease included. Attachment 5-6A is confidential and subject to Protective Order No. 23-138.

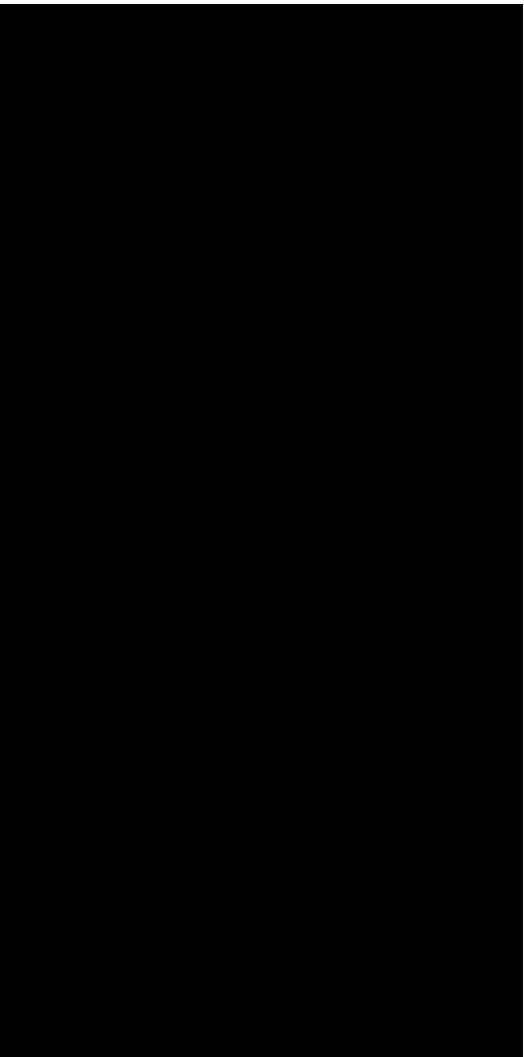
**TABLE 5
 PORTLAND GENERAL ELECTRIC
 ESTIMATED EFFECT ON CONSUMERS' TOTAL ELECTRIC BILLS
 2024**

Forecast
 Sept 23E24

TOTAL ELECTRIC BILLS
 CURRENT PROPOSED

BEGIN CONFIDENTIAL

CATEGORY	RATE SCHEDULE	CUSTOMERS	MWH SALES	all supplementals except PPC	all supplementals except PPC	Change	
						AMOUNT	PCT.
Residential	7	824,079	7,839,840	\$1,265,975,007			
Employee Discount				(\$1,449,438)			
Subtotal				\$1,264,525,569			
Outdoor Area Lighting	15	0	13,185	\$3,902,036			
General Service <30 kW	32	95,930	1,555,680	\$244,867,440			
Opt. Time-of-Day G.S. >30 kW	38	336	26,908	\$4,522,535			
Irrig. & Drain. Pump. < 30 kW	47	2,746	20,557	\$5,216,690			
Irrig. & Drain. Pump. > 30 kW	49	1,368	59,473	\$11,837,923			
General Service 31-200 kW	83	11,308	2,893,468	\$358,312,196			
General Service 201-4,000 kW							
Secondary	85-S	1,322	2,065,692	\$216,633,026			
Primary	85-P	179	634,079	\$58,385,735			
Schedule 89 > 4 MW							
Primary	89-P	17	858,148	\$69,940,657			
Subtransmission	89-T/75-T	3	35,262	\$3,420,569			
Schedule 90	90-P	7	3,551,713	\$261,696,093			
Street & Highway Lighting	91/95	189	37,529	\$13,296,074			
Traffic Signals	92	16	2,712	\$251,321			
COS TOTALS		937,500	19,594,245	\$2,516,807,862			
Direct Access Service 201-4,000 kW							
Secondary	485-S	214	434,217	\$11,042,137			
Primary	485-P	52	312,499	\$7,094,150			
Direct Access Service > 4 MW							
Primary	489-P	16	1,027,289	\$12,597,749			
Subtransmission	489-T	3	266,763	\$2,504,411			
New Load Direct Access Service > 10MW							
Primary	689-P	4	175,441	\$2,980,485			
DIRECT ACCESS TOTALS		288	2,216,210	\$36,218,932			
COS AND DA CYCLE TOTALS		937,788	21,810,454	\$2,553,026,794			



END CONFIDENTIAL

October 20, 2023

TO: Alison Lackey, Administrative Law Judge
Public Utility Commission of Oregon

FROM: Jaki Ferchland
Manager, Revenue Requirement

**PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-7
Dated October 18, 2023**

Request:

Refer to PGE's response to bench request 3-2 (stating "a Schedule 122 (Renewable Automatic Adjustment Clause) request for recovery of the Clearwater Wind Project is forthcoming, which will have an effective date sometime in mid-2024. PGE currently expects the Clearwater request to result in a net credit to customers due to a forecast reduction in Net Variable Power Costs.") Please explain whether the forecast reduction in NVPC associated with the Clearwater Wind Project is included in the 2024 NVPC forecasts filed to date. If not, please explain whether it will be included in the November 7th or November 15th MONET updates.

Response:

Clearwater-associated NVPC impacts are not included in PGE's 2024 NVPC forecast for UE 416. PGE will not be including Clearwater forecast NVPC within the November 7th or November 15th MONET updates, nor will these impacts be included within UE 416 prices. Clearwater-associated 2024 NVPC impacts will be included in Schedule 122, which not have a final determination after UE 416 has concluded.

October 20, 2023

TO: Alison Lackey, Administrative Law Judge
Public Utility Commission of Oregon

FROM: Jaki Ferchland
Manager, Revenue Requirement

PORTLAND GENERAL ELECTRIC
UE 416
PGE's Response to OPUC Revised Bench Request No. 5-9
Dated October 18, 2023

Request:

Refer to PGE's original and revised responses to bench request 3-1, Attachment A. Please explain all changes or corrections made in the revised version relative to the original version.

Response:

Two changes were made in the revised version of bench request 3-1 Attachment A relative to the original version:

- In the revised version, Schedule 110 Energy Efficiency, Customer Service is included in base rates at an amount of \$1.2 million, based on term 18 of the sixth partial stipulation in the GRC. Whereas, the original version did not recognize the movement of Schedule 110 into base rates.
- In the revised version, Schedule 146 Colstrip reflects the current amount for Colstrip with no updates for January 1, 2024 in both "current" and "proposed" revenues (i.e., no change to Schedule 146 revenues). Whereas, the original version reflected current Schedule 146 revenues in "current" revenues compared to estimated 2024 Schedule 146 revenues in "proposed" revenues (i.e., a change to Schedule 146 revenues).

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **Portland General Electric Company's CONFIDENTIAL Responses to Bench Requests 5-1 to 5-7 and 5-9 and attachments** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service list for OPUC Docket UE 416.

Dated at Portland, Oregon, this 20th day of October, 2023.

/s/ Danielle McCain

Danielle McCain
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UE 416 Service List

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