

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 435**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

8 **JOINT ISSUES LIST**

9 Pursuant to the Administrative Law Judge’s Ruling on September 27, 2024, Staff files
10 this Joint Issues List setting forth the issues presented by Portland General Electric Company’s
11 Request for a General Rate Revision. Staff conferred and collaborated with parties (PGE, Staff
12 of the Public Utility Commission, Oregon Citizens’ Utility Board, the Alliance of Western
13 Energy Consumers, Calpine Solutions, Chargepoint, Fred Meyer, NewSun Energy, Verde, and
14 Walmart) to create the Joint Issues List.

15 Because this Joint Issues List was not filed by the 3 p.m. deadline, Staff asks the
16 Commission to allow this late-filed document. Parties circulated several iterations of the
17 document and the editing and review process was time consuming. Because this document is
18 filed after 5 p.m. on October 4, 2024, Staff will serve this Joint Issues List on parties by e-mail
19 and will circulate a Word version that parties may use to create Party Issues Statements that are
20 due on October 8.

21 **Cost of Capital**

- 22
- 23 1. What should be PGE’s authorized return on equity?
 - 24 2. What should be PGE’s capital structure?
 - 25 3. What should be PGE’s cost of long-term debt?
- 26

1 **Rate Base**

- 2 4. What method should be used to calculate rate base and to calculate depreciation expense?
- 3 5. What amount of Cash Working Capital (CWC) should be included in rate base?
- 4 6. What is the appropriate amount for PGE to recover in rate base of fuel stock?
- 5 a. Should a year-end or average balance method be used to set the amount of
- 6 fuel stock?
- 7 b. Should PGE be required to conduct an analysis to show economic value of
- 8 holding a minimum of 1.2 million dth of natural gas at North Mist?
- 9 c. Should fuel stock be valued at “actual price at time of purchase” or should
- 10 fuel stock be valued at weighted average cost?
- 11 d. What is the appropriate way to value Beaver oil fuel stock?
- 12 7. What is the appropriate method to determine the amount for PGE to recover in rates for
- 13 Materials and Supplies?

14 **Revenues**

- 15 8. What is the appropriate amount of Other Revenue for Joint Pole Attachments and Steam
- 16 Revenue?

17 **Compensation**

- 18 9. What adjustments, if any, should be made to the following employee compensation
- 19 items?
- 20 a. Labor expense as they relate to FTE count, union expenses, non-union
- 21 expenses, and contract labor expenses
- 22 b. Annual cash incentives
- 23 c. Capitalized incentives (from 2024)
- 24 d. Stock incentives
- 25 e. Incentives overheads
- 26 f. Costs related to the above compensation amounts, i.e., payroll taxes and key
- customer management department costs.
- 27 10. Should the Commission adopt AWEC’s recommendation to split director’s fees and
- 28 expense between shareholders and ratepayers?

29 **Capital Projects**

- 30 11. Should PGE be required to provide project attestations for plant put in service by
- 31 December 31, 2024? If attestations are required:
- 32 a. What should the project value threshold be?
- 33 b. What in-service dates should be covered?

- c. What should the attestation timing be?
- d. Should the attestation process be allowed for both over and under-budget amounts in this rate proceeding?

12. What is the appropriate level for contingency funds? What adjustments, if any, should be made to the contingency funds from forecasted capital costs?

13. Has the Company demonstrated that the actual project costs for the three transmission and distribution capital investments, Horizon-Keeler BPA #2 230kV Line, Shute WJ1 and WJ2 Upgrade, and Shute Feeder Reconfiguration, identified by Staff are prudent?

14. Should the Commission remove forecasted investment for Diesel Particulate Filter Installations that are not complete by the rate effective date?

15. What amount should be included in rate base for IT capital additions?

- a. Should PGE recover its investments in the Zero Trust Program and EMS upgrade in rate base at the lower of the forecasted amount in PGE's filing (\$5.7 million and \$4.3 million, respectively), or the actual cost?
- b. Should PGE recovery of its investments in Network Fitness and CTO Desktop Fitness in rate base be reduced to the three-year average of expenditure?

Constable and Seaside Energy Storage Projects

16. Constable Battery Project:

- a. If PGE's Constable investment is not operating prior to the rate effective date of this rate case, should the Commission authorize PGE's proposed tracker for the Constable project? If so, what if any conditions should be included?
- b. If the Constable project is included in rates through a tracker or otherwise, should the Commission adopt Staff's recommended \$14 million reduction to rate base?

17. Seaside Battery Project:

- a. Should the Commission approve PGE's request for a tracker? If so, what conditions should be included?
- b. If the tracker for the Seaside Battery Project is approved, should the Commission adopt Staff's recommended \$44 million reduction to rate base?

18. What amortization period and treatment should apply to ITCs for Constable and Seaside?

- a. Should the ITC reduce rate base within the revenue requirement or be amortized through a separate schedule?
- b. Should the ITC be amortized over the life of Seaside or five years?
- c. Should the value of the ITC to refunded to customers be equal to the actual value of the ITCs received net of the cost to sell up to 10% of the sale value?

- 1 d. Should the Commission condition a finding that the Constable and Seaside
2 projects are prudent on PGE's agreement to opt out of Investment Tax Credit
(ITC) normalization for ITCs associated with Seaside.

3 **Non-labor Operations and Maintenance (O&M) expense**

4 19. What is the appropriate amount of recovery for PGE's Virtual Power Plant (VPP) O&M
5 expense? What adjustments, if any, should be made to the amount proposed by PGE?
How should VPP items be addressed in the future?

6 20. What adjustments, if any, should be made to the amount proposed by PGE for non-labor
7 generation O&M?

- 8 a. What adjustments, if any, should be made to the amount proposed by PGE for
the following corporate support (A&G) items:
9 b. General A&G category reduction
10 c. FERC Account 921 (office supplies)
d. Directors' and Officers' expense

11 21. What is the appropriate amount of recovery for the following insurance expense:

- 12 a. Property insurance expense - What adjustments, if any, should be made to the
13 amount proposed by PGE?
14 b. Casualty Insurance expense - What is the appropriate amount of recovery for
General & Auto Liability? What adjustments, if any, should be made to the
15 amount proposed by PGE?
16 c. What adjustments, if any, should be made related to insurance rebates and
credits?

17 22. What adjustments, if any, should be applied to the recovery of the following:

- 18 a. Revolver fees
19 b. Margin net interest
c. Broker fees
20 d. Membership expense

21 **T&D**

22 23. What is the appropriate amount to set in Test Year expense for Routine Vegetation
Management O&M? What adjustments, if any, should be made to the amount proposed
23 by PGE?

24 24. What is the appropriate amount to set in Test Year expense for Utility Asset
Management? What adjustments, if any, should be made to the amount proposed by
25 PGE?

26 25. What is the appropriate amount to set in Test Year expense for Customer Accounts and
Service O&M? What adjustments, if any, should be made to the amount proposed by
PGE?

1 26. What is the appropriate amount to set in Test Year expense for memberships and dues?
2 What adjustments, if any, should be made to the amount proposed by PGE?

3 **Taxes**

4 27. How should Production Tax Credit (“PTC”) carryforwards be considered in revenue
5 requirement considering that PGE received approval to sell PTCs in Docket UP 426?

6 28. Should the accumulated deferred income taxes (“ADIT”) associated with the emergency
7 wildfire and storm deferrals be considered in rate base?

8 29. How should the rate base and amortization benefit of the Anderson Readiness Center
9 investment tax credits (“ITCs”) be considered in revenue requirement?

10 **Grants**

11 30. What is the appropriate amount that PGE should recover for O&M costs related to PGE’s
12 Federal Grant request for the Grid Edge Computing Grant? What adjustments, if any
13 should be made to the amount proposed by PGE?

14 **Rate Spread/Rate Design**

15 31. What proposed changes, if any, should apply to the generation marginal cost study?

16 32. Should the Commission adopt proposed adjustments to PGE ‘s cap to customer class rate
17 increases? If so a cap and/or floor for customer class rate increases as a percentage of the
18 overall (or average) increase? If so, what should be the parameters?

19 33. Should the Commission adopt PGE’s revisions to the Customer Impact Offset (CIO) to
20 equalize the distribution charge for lighting schedules?

21 34. Should the Commission adopt PGE’s proposed increase to its residential basic charge?

22 35. Has PGE established that its proposed revisions to the load following credit for Schedule
23 90 are warranted?

24 36. Should PGE be required to apply Time of Use (TOU) to Schedule 90 customers?

25 **Transportation Line Extension Allowance**

26 37. Should the Commission adopt PGE’s proposal to make the Transportation Line
Extension Allowance program a permanent offering? If so, what adjustments, if any,
should apply?

1 **Transportation Electrification & PGE Fleet**

- 2 38. How much should PGE recover for the following customer-related transportation
3 electrification items?
4 a. UM 1811 pilots rate base
5 b. Electric Island rate base
6 c. TE database rate base
7 d. Line extension rate base amounts related to customer TE projects from 2019
8 to 2023
9 e. TE plan and program development expense
- 7 39. For the following fleet related items, what adjustments, if any, should be adopted?
8 a. PGE EV Fleet Vehicles rate base
9 b. PGE Fleet EV Charger rate base
c. PGE EV Charger Maintenance expense

10 **Customer Service Issues**

- 11 40. What other party proposals, if any, related to bill design, and sharing of information with
12 customers should the Commission require? If so, should the Commission adopt CUB's
13 proposed disallowance related to billing information?
- 14 41. What adjustments, if any, should be made to the amount proposed by PGE for non-labor
Customer Accounts O&M?
- 15 42. What adjustments, if any, should be made to the amount proposed by PGE for Key
16 Customer Management labor O&M?

17 **Affordability, Income Qualified Bill Discount and other Environmental Justice Issues**

- 18 43. What changes, if any, in response to the company's Energy Burden Assessment should
19 be adopted in this docket to PGE's Schedule 18 Income Qualified Bill Discount Program
discount levels, structure standards?
- 20 44. What changes, if any, should be adopted regarding post-enrollment verification or
21 income verification?
- 22 45. What changes, if any, should be adopted in this docket to PGE's disconnection policies,
23 generally or as related to IQBD customers specifically?
- 24 46. What changes, if any should be adopted in this docket to PGE's arrearage policy and fees
generally or as related to IQBD customers, specifically?
- 25 47. What changes, if any, should be adopted in this docket to PGE's bill due date for
26 residential customers?

1 48. What proposals by parties for additional reporting, stakeholder engagement, or customer
2 engagement should PGE be directed in this docket for PGEs IQBD program,
3 disconnections, arrearage or related issues? If required, what should be included and the
4 parameters?

5 49. Should there be a rate design change related to any increase in basic charge?

6 50. What, if any, proposed adjustments to Schedule 118 allocation methodology should be
7 adopted? (IQBD Recovery)

8 51. Should the Company convert its ductless heat pump program pilot program into a fully
9 funded program and increase coordination with ETO?

10 52. Should the Company expand weatherization efforts and services, amend its schedules to
11 recognize the long term, system-wide cost-efficiencies and implement targeted outreach
12 to IQBD customers?

13 53. Should the Commission require PGE to center energy efficiency for low-income
14 households in its rate scheme as a condition of any rate increase?

15 54. Should the Commission require PGE to implement neutral (i.e., third-party) technical
16 support related to rate case “walk-throughs” and other quasi-technical stakeholder
17 engagement, in order to appropriately bolster PGE’s procedural equity efforts,
18 prioritizing this for CBIAG most immediately?

19 **Other issues.**

20 55. Should PGE’s rate filing be rejected due to the following:

- 21 a. Failure to meet requirements of ORS 757.210(1)(a) by not providing
22 sufficient evidence that proposed rates are just, reasonable and in the public
23 interest; or
24 b. A collateral attack of issues resolved in Docket UE 416?

25 56. Should the Commission adopt CUB’s proposed tracker to delay the rate effective date of
26 PGE’s rate request?

57. Should the Commission apply an overall or residential rate cap to address rate shock? If
so what parameters should there be for the rate cap?

58. Should the Commission adopt CUB’s rate shock proposal?

59. Should the Commission require PGE to amortize the deferral related to PGE’s Clearwater
project starting January 1, 2025?

- 1 60. What revenue requirement treatment should apply to the reflection of ITCs for the
Anderson Readiness Center?
- 2 61. Should the Commission address PGE’s request to modify the Renewable Automatic
3 Adjustment Clause (RAAC) to allow PGE to recover costs of stand-alone batteries at the
4 transmission level in this docket or in a separate investigation?
- 5 62. Should the Commission open a docket investigating a framework for multi-year rate
cases?
- 6 63. Should the Commission require PGE to file a public version of its rate increase forecasts,
7 including forecasts contained in Monet updates and bench request, that has been
8 designated as confidential?
- 9 64. Should the Commission require PGE to provide information on customer bills showing
10 average cost of electricity in a cents/kwh basis?
- 11 65. Should the Commission require PGE, when PGE seeks to increase a residential rate
12 schedule, to file a plan for how it intends to communicate the rate change to residential
customers?

13 DATED this 4th day of October, 2024.

14 Respectfully submitted,

15 ELLEN F. ROSENBLUM
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16 */s/ Stephanie Andrus*

17 _____
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