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May 1, 2025

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: PGE's Regulated Results of Operations for 2024

Filing Center:

Attached is a copy of the Regulated Results of Operations Report for the period January 1, 2024 to December 31, 2024 and, per an OPUC Staff letter dated January 28, 2020, an additional report including: 1) all of PGE's regulatory assets and liabilities included in rate base; and 2) all of PGE's regulatory assets and liabilities excluded from rate base but included in PGE's accounting books. The attachments also include summary work papers. To create the regulated adjusted and pro forma earnings views, we apply the adjustments identified in this report from Commission Order No. 23-386 (Docket No. UE 416) and the OPUC Staff letter dated March 25, 1992 (RE: Semiannual Adjusted Results of Operations Reports).

Table 1: PGE 2024 Financial Results

	Actual Utility Results	Regulated Utility Actuals	Regulated Adjusted Results	Regulated Adjusted with Deferral Reversals	Pro Forma Results
Rate of Return (ROR)	6.51%	6.61%	6.98%	6.29%	5.42%
Return on Equity (ROE)	8.93%	9.17%	10.00%	8.44%	6.42%

PGE's UE 416 base rates authorized through Commission Order No. 23-386 were effective January 1, 2024.

Actual Utility Results

PGE's actual utility results come directly from PGE's general ledger system. The primary drivers of PGE's 2024 actual utility results are increased revenues partially offset by increased power costs, increased operations and maintenance (O&M) expense, and increased depreciation and amortization expense relative to 2023.

Regulated Utility Actuals

Regulated utility actual results are computed by adjusting actual recorded results for:

- Reclassification of approximately \$591.6 million from revenue to net variable power cost, consisting of sales for resale; steam sales; and resales of gas, oil, and transmission; and
- Other accounting adjustments, as specified on pages ii and iii of the Report.

The regulated actual return on equity was 9.17%. The regulated utility actuals are used to calculate the “Regulated Adjusted Results of Operations,” which is consistent with the Commission Order in the most relevant rate case (Docket No. UE 416).

Regulated Adjusted Results of Operations

The regulated adjusted results are computed by adjusting the regulated utility actuals of Table 1 for disallowances and adjustments agreed upon in the most recent general rate case, as well as other regulatory adjustments specified on pages iii through iv of the Report. Due to PGE’s Power Cost Adjustment Mechanism (PCAM – approved by Commission Order No. 07-715), we did not normalize power costs or weather because it is not appropriate to assume away the conditions that produce the power cost variance prior to determining the results of the PCAM earnings test. The regulated adjusted ROE is 10.00%.

Regulated Adjusted Results with Deferral Reversals

The regulated adjusted results with deferral reversals are computed by adjusting the regulated adjusted results of Table 1 for certain amounts deferred during 2024. The regulated adjusted ROE after reversal of deferred amounts is 8.44%. This is the appropriate value to use when assessing earnings for purposes of deferred accounts subject to earnings review.

Pro Forma Results

Finally, the OPUC requires utilities to estimate “Pro Forma” results, or a forward look, using the Results of Operations. Utilities are required to:

- Reflect end-of-period rate base (approximately \$813.0 million increase reflecting an increase in utility plant in service, partially offset by an increase in accumulated depreciation);
- Estimate additional costs and revenues that would have occurred if the utility had the year-end number of customers for the entire year. For PGE, this adjustment would increase revenues by approximately \$14.3 million and power costs by \$5.4 million; and
- Remove significant nonrecurring events (OPUC Staff letter dated March 25, 1992):
 - Reverse the 2024 annual power cost variance, within the deadbands, calculated under the PCAM, as described above, to reflect normal power costs, which are more indicative of future results; and
 - Remove additional nonrecurring events as specified on page vi of the Report.

The impact of these adjustments decreased PGE's regulated ROE from 8.44% (Regulated Adjusted Results with Deferral Reversals) to 6.42% (Pro Forma Basis).

If you have any questions, please call me at (503) 464-8644.

Sincerely,

/s/ Greg Batzler

Greg Batzler
Manager, Revenue Requirement

Enclosure

cc: Bob Jenks, CUB
Tyler Pepple, AWEC

REPORT OF OPERATIONS
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Work papers are included in a separate attachment.

1. Description of Report

The Results of Operations Report (ROO) adjusts the calendar year 2024 operating results that PGE reported to the Securities and Exchange Commission to provide a regulatory perspective reflecting decisions in Docket No. UE 416 and the March 25, 1992 Oregon Public Utility Commission (OPUC or Commission) Staff letter. This provides a "Regulated Adjusted Results of Operation." In addition, to provide a "Regulated Adjusted Results of Operation" that can be used for earnings reviews, we reverse amounts deferred for 2024 that are subject to an earnings review and amounts deferred for 2024, which are exempt from an earnings review. Finally, consistent with the OPUC's reporting guidelines, we make certain "annualizing adjustments" to show operating results adjusted to period-end.

One original purpose of the ROO was to provide the Commission with operating results on a relatively forward-looking basis. However, because of the potential volatility in power and natural gas markets as well as the unpredictability of variable power resources, the historic operating environment is less useful in forecasting future operating performance.

This report includes Type II adjustments for "Nonrecurring Events." We incorporated these adjustments to "remove recorded entries related to significant nonrecurring events," as required by the OPUC Staff letter dated March 25, 1992 (RE: Semiannual Adjusted Results of Operations Reports, page 3). Our main concern was to eliminate those entries that may materially bias the pro forma results.

PGE's actual utility results (column 1) operating income in 2024 increased by approximately \$128 million from 2023, reflecting increased sales to consumers and sales for resale compared with 2023, that are partially offset by increased operating expenses. The increase to operating expenses is largely driven by increased net variable power costs (NVPC), base operations and maintenance (O&M) expense, and increased depreciation and amortization expense.

1.1 Recorded Actuals

Columns 1 through 3 on page 1 of the ROO Report present the recorded actual amounts. Column 1 represents PGE's actual utility results; column 3 is PGE's financial statement for regulatory reporting. Section 1.2 discusses the adjustments in column 2.

The General Ledger Detail section of the work papers provides detail for column 1. The first two work paper documents, "Regulated Financial Detail" and "Results of Operations" restate column 1 into a rate case format (versus an external reporting format). Pages 4 and 5 summarize and report all utility accounting adjustments (column 2).

The "General Ledger Detail" section of work papers also includes the monthly detail for constructing the actual capital structure and the average rate base. Please note that the pro forma return on equity (ROE) calculation is based on the end-of-period capital structure. All the data, except for the effective cost of debt, come directly from PGE's general ledger system. The effective cost of debt includes the cost associated with the debt issuance and incorporates any adjustments authorized by the Commission in Order No. 23-386.

1.2 Utility Accounting Adjustments: Type 1

There are eight Type 1 accounting adjustments for 2023. The adjustments are found on pages 4 and 5 and are described below.

- Column 1: Revolving Credit Fees and Interest on Customer Deposits
 This adjustment reflects interest costs that would otherwise not appear in utility operating income:
- In Docket No. UE 215, the parties stipulated that PGE would include revolving credit facility fees in Administrative & General (A&G) costs (Commission Order No. 10-410, Appendix A, page 2 of 9). For 2024, the revolving credit facility fees totaled approximately \$2.1 million.
 - Because PGE receives deposits from retail customers, which are included in rate base, we adjust Other Revenue for the interest paid on those amounts. The adjustment of approximately \$535 thousand reflects the net difference of interest paid (\$535 thousand) and received on these deposits (approximately \$0).
- Column 2: Regional Power Act (RPA) Reversal
 The effects of the RPA settlement are reversed for regulatory analysis. Since these benefits are a “flow-through” item to customers, their effects on tariffs and Other Revenues are removed.
- Column 3: Steam Sales, Sales for Resale, Transmission, Oil and Gas Resale
 Sales for Resale of approximately \$588.1 million plus steam sales and gas, oil, and transmission resales of approximately \$3.5 million are reclassified from revenues to NVPC for regulatory analysis.
- Column 4&5: Out-of-Period and Capital Reclass Adjustments
 For 2024, we adjust for the following items:
- We credit net variable power costs by approximately \$2.4 million for the following items:
 - \$1.5 million associated with a true-up of 2021-2023 wind royalties.
 - (\$0.5 million) associated with a variance between December 2023 actual gas purchases compared to amounts accrued in December.
 - \$0.5 million associated with an invalid Grant County reoccurring invoice.
 - \$0.9 million associated with a clean-out of aging prior period accounts receivable settlements.
 - We debit net variable power costs by approximately \$0.6 million for the following items:
 - \$1.3 million associated with a true-up of 2024 wind royalties.

- (\$0.8 million) associated with a variance between December 2024 actual gas purchases compared to amounts accrued in December.
- (\$0.9 million) associated with a true-up of a January 2024 reliability contingency event.
- \$1.0 million associated with the true-up of a 2024 battery energy storage system capacity payment.
- We debit distribution expense by approximately \$1.5 million for 2020 wildfire insurance proceeds received during 2024.
- We debit fixed plant O&M by approximately \$2.7 million for the reclassification of Boardman property purchase costs from capital to expense.
- We debit transmission O&M by approximately \$2.3 million for the reclassification of Bethel to Round Butte transmission study costs from capital to expense.

Column 6: Removal of Certain 2020 Energy Trading Loss Impacts
 We increase accumulated deferred income tax by approximately \$18.4 million to removing impacts from certain 2020 energy trading losses. Additional impacts reflected within PGE's Regulated Utility Results include an approximate \$103.9 million adjustment to PGE's average debt, reflecting the cumulative net impact of the above-referenced trading losses to PGE's regulated debt balance.

Column 7: Utility Tax Adjustment (Interest Adjustment)
 This adjustment accounts for the difference between PGE Consolidated interest expense and PGE (utility only) interest expense. We reduce interest expense and the associated interest deduction for tax purposes to accomplish this. This reduction is made using the proportion of the interest costs exceeding that associated with rate base. The effect of this adjustment is to increase income tax expense. The adjustment is calculated based on the methodology established in Docket No. UE 79 and continued in Docket No. UE 88 and subsequent rate cases.

Column 8: Remove Capital and Operating Leases from Utility Plant in Service
 This entry removes capital and operating leases from utility plant in service to reflect utility accounting standard practices. PGE does not own the assets for which we incur the capital and operating leases and recovers the lease amounts through lease payments and lease expenses.

1.3 Regulatory Adjustments: Type 1

Pages 6 and 7 contain the regulatory adjustments. Each adjustment is described below with supporting documentation in the appropriate work papers. Due to PGE's Power Cost Adjustment Mechanism (PCAM) approved by Commission Order No. 07-715, Docket No. UE 180, we did not normalize hydro or wind conditions, plant operations, or weather.

- Column 1: Advertising Categories "A" and "C" and Corporate Image
PGE reduces Customer Service and A&G costs by approximately \$0.6 million as follows:
- Per OAR 860-026-0022 (3)(a) PGE limits its Category A advertising expense to “twelve and one-half hundredths of 1 percent (0.125 percent) ... of the gross retail operating revenues.”
 - 100% of Category "C" advertising and corporate image expenditures.
- Column 2: Supplemental Executive Retirement Plan (SERP)
Although the recent rate order (No. 23-386 in Docket No. UE 416) did not specifically exclude this cost from PGE’s revenue requirement, we remove it here because it was consistently and fully disallowed in prior Commission decisions. This adjustment removes approximately \$1.1 million in costs from regulated results of operations.
- Column 3: Management Deferred Compensation Plan (MDCP)
Although the recent rate order (No. 23-386 in Docket No. UE 416) did not specifically exclude this cost from PGE’s revenue requirement, we remove it here because it was consistently and fully disallowed in prior Commission decisions. This adjustment removes approximately \$5.1 million in costs from regulated results of operations.
- Column 4: Officer Incentive Pay
Although the recent rate order (No. 23-386 in Docket No. UE 416) did not specifically exclude this cost from PGE’s revenue requirement, we remove it here because it was consistently and fully disallowed in prior Commission decisions. This adjustment removes approximately \$21.1 million in costs from regulated results of operations.

- Column 5: UE 283 Incentive Adjustment
In accordance with Commission Order No. 14-422 (Docket No. UE 283) a \$0.5 million reduction is applied to amortization expense, reflecting amortization of the incentive-related \$10 million rate base adjustment over 20 years, which is included within PGE's regulated rate base.
- Column 6: UE 416 Stipulated Adjustments
In accordance with Commission Order No. 23-386 (Docket No. UE 416) a \$27.5 million reduction is applied to utility plant in service and a \$4.25 million increase is applied to operating revenues, reflecting a Bundled Issues settlement agreement. Additionally, a \$213 thousand increase is also applied to operating revenues to resolve the Biglow blade liberation incident.

1.4 Regulatory Adjustments – 2023 Deferred Amounts

Pages 8 and 9 contain the regulatory adjustment made to reflect PGE's earnings with certain 2023 deferred amounts included in expenses. This adjustment is made to reflect PGE's financial results with all costs included and is described below with supporting documentation in the appropriate work papers.

- Column 1: 2024 Deferred Amounts
PGE has debited expense by the amounts deferred for 2024 to reflect PGE's financial results with all applicable costs, including amounts previously deferred in 2024. This provides the earnings test ROE from which deferral amortization can be appropriately determined. The identified deferrals and 2024 amounts:
- Transportation Electrification Pilots Deferral (Docket No. UM 1938) – (\$0.2) million;
 - Electric Vehicle Charging Pilots Deferral (Docket No. UM 2003) - \$0.6 million;
 - Battery Storage Pilot Deferral (Docket No. UM 2078) - \$0.6 million;
 - January Major Storm Deferral (Docket No. UM 2190) - \$42.8 million;
 - Wildfire Mitigation 2024 Deferred Amounts (Docket No. UM 2019) - \$21.6 million;¹ and
 - PHERA Deferral (Docket No. UM 1789) - \$0.4 million.

1.5 Annualized Adjustments: Type II

Pages 10 and 11 contain the annualizing adjustments. We describe each adjustment below and provide supporting documentation in the work papers.

- Column 1: Period-End Rate Base and Escalation
We adjust rate base accounts to show year-end balances, rather than average balances. We also annualized the following expense items with a half-year

¹ Remaining amounts to be later reviewed for recovery pursuant to Commission Order No. 24-035.

of escalation. The escalation rate is based on "CPI, All Items, Urban Consumers" in Global Insight's U.S. Economic Outlook.

- * Fixed Plant
- * Transmission
- * Distribution
- * Customer Accounts
- * Customer Service and Sales
- * Administration and General
- * Taxes Other Than Income

The escalation adjustment adds the effects of inflation to those expenses actually incurred by PGE to support its customer base. The escalation of expenses is not designed to account for the increased activities and expenses associated with the addition of new customers throughout the year. End-of-Period Customer costs are discussed in Column 3 below.

Column 2:

Nonrecurring Events

PGE applies this adjustment to remove entries related to significant nonrecurring events. Utilities were instructed to do so in the OPUC Staff letter dated March 25, 1992 in order to eliminate those costs and revenues that should not be relied upon on a forward-looking basis. In 2021, we identified the following:

- NVPC: As discussed above, PGE does not normalize actual NVPC because of PGE's PCAM. However, on a forward-looking (pro forma) basis, we project NVPC on a normal basis. Consequently, we removed the annual power cost variance within the deadbands to reflect normal results, which is more indicative of a going-forward basis.² The 2023 annual power cost variance is approximately \$4.8 million.
- 2024 Deferred Amounts: As the deferred expense amounts included within PGE's Type I Regulatory Deferral Adjustment can be considered significant nonrecurring events, PGE has determined it is not appropriate to include the reversal amounts within the Pro Forma Results.

Column 3:

End-of-Period Annualizing Adjustment

This adjustment estimates the additional costs and revenues that would have occurred if PGE had the year-end number of customers for the entire year. Incremental O&M and retail revenues are estimated based on actual average O&M per customer and PGE's year-end retail rate for 2023. No annualizing cost adjustment is required for large industrial, large commercial, or street-lighting customers.

² As described on page i, the PCAM variance subject to collection, is recorded as credit directly to PGE's regulated utility actuals and thus, is already normalized for PGE's Type II Pro Forma results.

1.5 Capital Structure

We used the actual average capital structure for the ROE calculation. To fully remove the effects of certain 2020 energy trading losses from PGE's ROO results, we adjusted average annual debt by the after-tax impact of the 2020 losses. For the pro forma ROE calculation, we estimated the actual end-of-period capital structure adjusted for the effects of the above-mentioned trading activity. The capital structure detail is shown on Page 12. The long-term debt and equity detail are found in the "General Ledger Detail" section of the work papers.

1.6 Costs and Revenues for Meter Information Services

In May 2005, OPUC Staff and PGE stipulated an agreement in Docket No. UE 156 concerning meter information services and the E-Manager program. The stipulation was approved by OPUC Order No. 05-703. Condition No. 7 of the Order (Appendix A, page 3) specifies that PGE will provide the fully allocated costs and revenues of these services in PGE's Regulated Results of Operation Report.

In 2024, total revenues for meter information services were \$340,123. The fully allocated costs were \$242,558. Table 1 below specifies revenues and costs by FERC account.

Table 1 - Costs and Revenues for Meter Information Services, year 2024

<u>FERC Account No.</u>	<u>Amount (\$)</u>
451	(346,566)
417	-
<i>Total Revenues</i>	<u><u>(346,566)</u></u>
903	-
908	6,791
929	(2,040)
417.1	158,038
<i>Total Costs</i>	<u><u>162,788</u></u>

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Page 1

Regulatory adjustments based on
Docket UE 416, Order 23-386

	Actual Utility Results	Type I Accounting Adjustments	Regulated Utility Results	Type I Regulatory Adjustments	Regulated Adjusted Results	Type I Deferral Reversals	Regulated Adjusted with Deferral Reversals	Type 2 Pro Forma Adjustments	Pro Forma Results
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
			(1+2)		(3+4)		(5+6)		(7+8)
Operating Revenues									
Sales to Consumers	2,811,954	(535)	2,811,419	0	2,811,419	0	2,811,419	14,284	2,825,703
Sales for Resale	588,094	(588,094)	0	0	0	0	0	0	0
Other Operating Revenues	60,667	(3,538)	57,129	4,463	61,592	0	61,592	0	61,592
Total Operating Revenues	3,460,715	(592,167)	2,868,548	4,463	2,873,011	0	2,873,011	14,284	2,887,295
Operation & Maintenance									
Net Variable Power Cost	1,468,023	(593,403)	874,620	0	874,620	1,149	875,769	81,880	957,650
Total Fixed O&M	438,742	6,454	445,196	0	445,196	64,233	509,429	(53,523)	455,906
Other O&M	371,490	2,091	373,580	(27,899)	345,681	441	346,122	4,615	350,737
Total Operation & Maintenance	2,278,254	(584,858)	1,693,396	(27,899)	1,665,497	65,823	1,731,320	32,972	1,764,293
Depreciation & Amortization	495,466	0	495,466	(500)	494,966	0	494,966	7,426	502,392
Other Taxes / Franchise Fee	173,230	0	173,230	0	173,230	0	173,230	3,080	176,310
Income Taxes	37,375	8,316	45,691	9,059	54,750	(17,769)	36,981	(13,556)	23,425
Total Oper. Expenses & Taxes	2,984,325	(576,543)	2,407,783	(19,340)	2,388,443	48,054	2,436,497	29,923	2,466,420
Utility Operating Income	476,389	(15,624)	460,765	23,803	484,568	(48,054)	436,514	(15,639)	420,875
Rate of Return	6.51%		6.61%		6.98%		6.29%		5.42%
Return on Equity	8.93%		9.17%		10.00%		8.44%		6.42%
ROE based on actual capital structure.									
Average Rate Base									
Utility Plant in Service	13,950,160	(334,258)	13,615,902	(27,500)	13,588,402	0	13,588,402	1,030,115	14,618,516
Accumulated Depreciation	6,047,139	0	6,047,139	0	6,047,139	0	6,047,139	161,919	6,209,058
Accumulated Def. Income Taxes	759,280	18,400	777,680	0	777,680	0	777,680	55,192	832,872
Accumulated Def. Inv. Tax Credit	0	0	0	0	0	0	0	0	0
Net Utility Plant	7,143,741	(352,658)	6,791,083	(27,500)	6,763,583	0	6,763,583	813,004	7,576,586
Deferred Programs & Investments	3,862	0	3,862	0	3,862	0	3,862	3,705	7,567
Operating Materials & Fuel	114,998	0	114,998	0	114,998	0	114,998	(888)	114,110
Misc. Deferred Credits	(38,968)	0	(38,968)	0	(38,968)	0	(38,968)	1,544	(37,424)
Unamortized Ratepayer Gains	0	0	0	0	0	0	0	0	0
Working Cash	94,780	637	95,417	(817)	94,600	2,029	96,629	7,538	104,167
Total Average Rate Base	7,318,412	(352,021)	6,966,392	(28,317)	6,938,075	2,029	6,940,104	824,903	7,765,007

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	Actual Utility Results	Type I Accounting Adjustments	Regulated Utility Results	Type I Regulatory Adjustments	Regulated Adjusted Results	Type I Deferral Reversals	Regulated Adjusted with Deferral Reversals	Type 2 Pro Forma Adjustments	Pro Forma Results
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Operating Revenues			(1+2)		(3+4)		(5+6)		(7+8)
1 Residential	1,406,371	53,600	1,459,971	0	1,459,971	0	1,459,971	7,296	1,467,267
2 Commercial	895,341	0	895,341	0	895,341	0	895,341	6,988	902,329
3 Industrial	435,066	0	435,066	0	435,066	0	435,066	0	435,066
4 Other	75,176	(54,136)	21,041	0	21,041	0	21,041	0	21,041
5 Sales to Consumers	2,811,954	(535)	2,811,419	0	2,811,419	0	2,811,419	14,284	2,825,703
6a Sales for Resale	588,094	(588,094)	0	0	0	0	0	0	0
6 Other Operating Revenues	60,667	(3,538)	57,129	4,463	61,592	0	61,592	0	61,592
7 Total Operating Revenues	3,460,715	(592,167)	2,868,548	4,463	2,873,011	0	2,873,011	14,284	2,887,295
Operation & Maintenance									
8 Steam VPC	42,052	0	42,052	0	42,052	0	42,052	0	42,052
9 Gas / Other VPC	412,824	0	412,824	0	412,824	0	412,824	77,641	490,465
10 Production	454,876	0	454,876	0	454,876	0	454,876	77,641	532,517
11 Purchased Power	879,860	(1,771)	878,089	0	878,089	1,149	879,238	4,239	883,477
12 RPA Exchange	0	0	0	0	0	0	0	0	0
13 Sales for Resale	0	(591,632)	(591,632)	0	(591,632)	0	(591,632)	0	(591,632)
14 Wheeling	133,287	0	133,287	0	133,287	0	133,287	0	133,287
15 Net Variable Power Cost	1,468,023	(593,403)	874,620	0	874,620	1,149	875,769	81,880	957,650
16 Fixed Plant Cost	184,896	2,669	187,565	0	187,565	0	187,565	2,706	190,272
17 Transmission	25,518	2,287	27,804	0	27,804	0	27,804	401	28,206
18 Distribution	228,328	1,498	229,826	0	229,826	64,233	294,059	(56,631)	237,429
19 Total Fixed O&M	438,742	6,454	445,196	0	445,196	64,233	509,429	(53,523)	455,906
20 Customer Accounts / Bad Debt	84,964	0	84,964	0	84,964	0	84,964	1,226	86,190
21 Customer Service	28,883	0	28,883	0	28,883	0	28,883	417	29,300
22 Admin. & General / OPUC Fee	257,643	2,091	259,734	(27,899)	231,834	441	232,275	2,972	235,247
23 Other O&M	371,490	2,091	373,580	(27,899)	345,681	441	346,122	4,615	350,737
24 Total Operation & Maintenance	2,278,254	(584,858)	1,693,396	(27,899)	1,665,497	65,823	1,731,320	32,972	1,764,293
25 Depreciation & Amortization	495,466	0	495,466	(500)	494,966	0	494,966	7,426	502,392
26 Other Taxes / Franchise Fee	173,230	0	173,230	0	173,230	0	173,230	3,080	176,310
27 Income Taxes (Non-Federal)	13,654	2,331	15,985	2,540	18,525	(4,982)	13,543	(3,800)	9,743
28 Federal Income Tax Net of ITC	5,845	5,984	11,830	6,520	18,349	(12,788)	5,562	(9,755)	(4,194)
29 Deferred Income Taxes	(42,419)	0	(42,419)	0	(42,419)	0	(42,419)	0	(42,419)
30 Current/Deferred Taxes True-up	0	0	0	0	0	0	0	0	0
31 I.T.C. Adjustment	60,295	0	60,295	0	60,295	0	60,295	0	60,295
32 Total Oper. Expenses & Taxes	2,984,325	(576,543)	2,407,783	(19,340)	2,388,443	48,054	2,436,497	29,923	2,466,420
33 Utility Operating Income	476,389	(15,624)	460,765	23,803	484,568	(48,054)	436,514	(15,639)	420,875

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	Actual Utility Results	Type I Accounting Adjustments	Regulated Utility Actuals	Type I Regulatory Adjustments	Regulated Adjusted Results	Type I Deferral Reversals	Regulated Adjusted with Deferral Reversals	Type II Adjustments	Pro Forma Results
	(1)	(2)	(3)	(4)	(5)	(4)	(5)	(6)	(7)
Average Rate Base									
34 Utility Plant in Service	13,950,160	(334,258)	13,615,902	(27,500)	13,588,402	0	13,588,402	1,030,115	14,618,516
35 Accumulated Depreciation	6,047,139	0	6,047,139	0	6,047,139	0	6,047,139	161,919	6,209,058
36 Accumulated Def. Income Taxes	759,280	18,400	777,680	0	777,680	0	777,680	55,192	832,872
37 Accumulated Def. Inv. Tax Credit	0	0	0	0	0	0	0	0	0
38 Net Utility Plant	7,143,741	(352,658)	6,791,083	(27,500)	6,763,583	0	6,763,583	813,004	7,576,586
39 Deferred Programs & Investments	3,862	0	3,862	0	3,862	0	3,862	3,705	7,567
40 Operating Materials & Fuel	114,998	0	114,998	0	114,998	0	114,998	(888)	114,110
41 Misc. Deferred Credits	(38,968)	0	(38,968)	0	(38,968)	0	(38,968)	1,544	(37,424)
42 Unamortized Ratepayer Gains	0	0	0	0	0	0	0	0	0
43 Working Cash	94,780	637	95,417	(817)	94,600	2,029	96,629	7,538	104,167
44 Total Average Rate Base	7,318,412	(352,021)	6,966,392	(28,317)	6,938,075	2,029	6,940,104	824,903	7,765,007
Income Tax Calculations									
45 Book Revenues		(592,167)		4,463		0		14,284	
46 Book Expenses		(584,858)		(28,399)		65,823		43,479	
47 Not used		0		0		0		0	
48 Interest Rate Base @ Weighted Cost of Debt		(38,137)		(723)		52		21,060	
49 Schedule M Differences		0		0		0		0	
50 State Taxable Income		30,828		33,585				(50,255)	
51 State Income Tax @ 7.56204369	7.562%	2,331		2,540				(3,800)	
52 Additional Tax Depreciation		0		0		0		0	
53 Federal Taxable Income		28,497		31,045		(60,894)		(46,454)	
54 Fed Tax @ 21%	21.00%	5,984		6,520		(12,788)		(9,755)	
55 ITC @ 0%	0	0		0		0		0	
56 Current Federal Tax		5,984		6,520		(12,788)		(9,755)	
ITC Adjustment									
57 Deferral		0		0		0		0	
58 Restoration		0		0		0		0	
59 Deferred Taxes		0		0		0		0	
60 Current/Deferred Taxes True-up		0		0		0		0	
61 Total Income Tax		8,316		9,059		(17,769)		(13,556)	

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UTILITY ACCOUNTING ADJUSTMENTS

Type I Adjustments	Revolving Credit Fees and Int. on Cust. Deps	RPA	Steam, Oil, etc. Sales and Sales-for- Resale	Out of Per and Other Adjs	Capital Reclass	Trading Activity	Utility Tax Adj.	ASC 842 Lease Accounting	Total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Operating Revenues									
1 Residential		53,600							53,600
2 Commercial		0							0
3 Industrial		0							0
4 Other Revenue	(535)	(53,600)		0	0	0		0	(54,136)
5 Unbilled Revenues									0
6 Sales to Consumers	(535)	0	0	0	0	0	0	0	(535)
6a Sales for Resale			(588,094)						(588,094)
7 Other Operating Revenues			(3,538)	0		0			(3,538)
8 Total Operating Revenues	(535)	0	(591,632)	0	0	0	0	0	(592,167)
Operation & Maintenance									
9 Steam VPC									0
10 Nuclear									0
11 Gas / Other VPC					0			0	0
12 Production	0	0	0	0	0	0	0	0	0
13 Purchased Power				(1,771)					(1,771)
14 RPA Exchange		0							0
15 Sales for Resale			(591,632)	0		0			(591,632)
16 Wheeling						0			0
17 Net Variable Power Cost	0	0	(591,632)	(1,771)	0	0	0	0	(593,403)
18 Fixed Plant Cost					2,669			0	2,669
19 Transmission					2,287				2,287
20 Distribution				1,498					1,498
21 Total Fixed O&M	0	0	0	1,498	4,956	0	0	0	6,454
22 Customer Accounts									0
23 Customer Service									0
24 Administration & General	2,091				0			0	2,091
25 Other O&M	2,091	0	0	0	0	0	0	0	2,091
26 Total Operation & Maintenance	2,091	0	(591,632)	(273)	4,956	0	0	0	(584,858)
27 Depreciation & Amortization				0	0	0		0	0
28 Taxes Other than Income					0			0	0
29 Inc. Taxes (Non-Federal)	(199)	0	0	21	(375)	36	2,204	645	2,331
30 Federal Inc. Tax Net of ITC	(510)	0	0	53	(963)	91	5,657	1,656	5,984
31 Deferred Income Taxes	0	0	0	0	0	0	0	0	0
32 Current/Deferred Taxes True-up	0	0	0	0	0	0	0	0	0
33 I.T.C. Adjustment	0	0	0	0	0	0	0	0	0
34 Total Oper. Exp. & Taxes	1,382	0	(591,632)	(199)	3,618	127	7,861	2,301	(576,543)
35 Utility Operating Income	(1,917)	0	0	199	(3,618)	(127)	(7,861)	(2,301)	(15,624)

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Type I Adjustments	Revolving Credit Fees and Int. on Cust. Deps	RPA	Steam, Oil, etc. Sales and Sales-for- Resale	Out of Per and Other Adjs	Capital Reclass	Trading Activity	Utility Tax Adj.	ASC 842 Lease Accounting	Total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Average Rate Base									
36 Utility Plant in Service								(334,258)	(334,258)
37 Accumulated Depreciation									0
38 Acc Def. Income Taxes						18,400			18,400
39 Acc Def. Inv. Tax Credit									0
40 Net Utility Plant	0	0	0	0	0	(18,400)	0	(334,258)	(352,658)
-----									0
41 Deferred Programs & Investments									0
42 Operating Materials & Fuel									0
43 Misc. Deferred Credits									0
44 Unamortized Ratepayer Gains									0
45 Working Cash	58	n/a	n/a	(8)	153	5	332	97	637
46 Total Average Rate Base	58	0	0	(8)	153	(18,395)	332	(334,160)	(352,021)
Income Tax Calculations									
47 Book Revenues	(535)	0	(591,632)	0	0	0	0	0	(592,167)
48 Book Expenses	2,091	0	(591,632)	(273)	4,956	0	0	0	(584,858)
49 Not used.									0
50 Int. R-Base @ Wtd Cost of Debt	1	0	0	(0)	4	(470)	(29,141)	(8,531)	(38,137)
51 Schedule M Differences	0	0	0	0	0	0	0	0	0
52 State Taxable Income	(2,628)	0	0	273	(4,960)	470	29,141	8,531	30,828
53 State Income Tax @ 7.5620436916%	(199)	0	0	21	(375)	36	2,204	645	2,331
54 Additional Tax Depreciation	0	0	0	0	0	0		0	0
55 Federal Taxable Income	(2,429)	0	0	253	(4,585)	434	26,938	7,886	28,497
56 Fed Tax @ 21%	(510)	0	0	53	(963)	91	5,657	1,656	5,984
57 ITC @ 0%	0	0	0	0	0	0	0	0	0
58 Current Federal Tax	(510)	0	0	53	(963)	91	5,657	1,656	5,984
ITC Adjustment									
59 Deferral	0	0	0	0	0	0	0	0	0
60 Restoration	0	0	0	0	0	0	0	0	0
61 Deferred Taxes	0	0	0	0	0	0	0	0	0
62 Current/Deferred Taxes True-up	0	0	0	0	0	0	0	0	0
63 Total Income Tax	(709)	0	0	74	(1,338)	127	7,861	2,301	8,316

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Regulatory adjustments based on
Docket UE 416, Order 23-386

Type I Adjustments	Advertising (1)	SERP (2)	MDCP (3)	Incentive Pay (4)	UE 283 Incentive Adjustment (5)	UE 416 Stipulated Items (6)	Total Type I Adjustments (7)
Operating Revenues							
1 Residential							0
2 Commercial							0
3 Industrial							0
4 Other Revenue							0
5 Unbilled Revenues							0
6 Sales to Consumers	0	0	0	0	0	0	0
6a Sales for Resale							
7 Other Operating Revenues						4,463	4,463
8 Total Operating Revenues	0	0	0	0	0	4,463	4,463
Operation & Maintenance							
9 Steam							0
10 Nuclear							0
11 Gas / Other VPC							0
12 Production	0	0	0	0	0	0	0
13 Purchased Power							0
14 RPA Exchange							0
15 Sales for Resale							0
16 Wheeling							0
17 Net Variable Power Cost	0	0	0	0	0	0	0
18 Fixed Plant Cost							0
19 Transmission							0
20 Distribution							0
21 Total Fixed O&M	0	0	0	0	0	0	0
22 Customer Accounts	0	0	0	0	0	0	0
23 Customer Service							0
24 Administration & General	(643)	(1,107)	(5,068)	(21,081)			(27,899)
25 Other O&M	(643)	(1,107)	(5,068)	(21,081)	0	0	(27,899)
26 Total Operation & Maintenance	(643)	(1,107)	(5,068)	(21,081)	0	0	(27,899)
27 Depreciation & Amortization	0	0	0	0	(500)		(500)
28 Taxes Other than Income	0	0	0	0	0	0	0
29 Income Taxes (Non-Federal)	49	84	384	1,595	38	390	2,540
30 Federal Income Tax Net of ITC	125	215	985	4,096	97	1,002	6,520
31 Deferred Income Taxes	0	0	0	0	0	0	0
32 Current/Deferred Taxes True-up	0	0	0	0	0	0	0
33 ITC Adjustment	0	0	0	0	0	0	0
34 Total Oper. Expenses & Taxes	(470)	(808)	(3,700)	(15,390)	(365)	1,393	(19,340)
35 Utility Operating Income	470	808	3,700	15,390	365	3,070	23,803

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Type I Adjustments	Advertising	SERP	MDCP	Incentive Pay	UE 283 Incentive Adjustment	UE 416 Stipulated Items	Total Type I Adjustments
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Average Rate Base							
36 Utility Plant In Service				0	0	(27,500)	(27,500)
37 Accumulated Depreciation							0
38 Acc Def. Income Taxes							0
39 Acc Def. Inv. Tax Credit	0	0	0	0	0	0	0
40 Net Utility Plant	0	0	0	0	0	(27,500)	(27,500)

41 Deferred Programs & Investments							0
42 Operating Materials & Fuel							0
43 Misc. Deferred Credits							0
44 Unamortized Ratepayer Gains							0
45 Working Cash	(20)	(34)	(156)	(650)	(15)	59	(817)
46 Total Average Rate Base	(20)	(34)	(156)	(650)	(15)	(27,441)	(28,317)
Income Tax Calculations							
47 Book Revenues	0	0	0	0	0	4,463	4,463
48 Book Expenses	(643)	(1,107)	(5,068)	(21,081)	(500)	0	(28,399)
49 Not used							0
50 Int. R-Base @ Wtd Cost Debt	(1)	(1)	(4)	(17)	(0)	(701)	(723)
51 Schedule M Differences	0	0	0	0	0	0	0
52 State Taxable Income	644	1,108	5,072	21,098	500	5,164	33,585
53 State Income Tax @ 7.5620436916%	49	84	384	1,595	38	390	2,540
54 Additional Tax Depreciation	0	0	0	0	0	0	0
55 Federal Taxable Income	595	1,024	4,688	19,503	463	4,773	31,045
56 Fed Tax @ 21%	125	215	985	4,096	97	1,002	6,520
57 ITC @ 0%	0	0	0	0	0	0	0
58 Current Federal Tax	125	215	985	4,096	97	1,002	6,520
ITC Adjustment							
59 Deferral	0	0	0	0	0	0	0
60 Restoration	0	0	0	0	0	0	0
61 Deferred Taxes	0	0	0	0	0	0	0
62 Current/Deferred Taxes True-up	0	0	0	0	0	0	0
63 Total Income Tax	174	299	1,368	5,691	135	1,393	9,059

Type I Deferred Expense Reversal	2024 Deferred Expense	Blank	Total Deferred Expense Adjustments
	(1)	(2)	(3)
Operating Revenues			
1 Residential			0
2 Commercial			0
3 Industrial			0
4 Other Revenue			0
5 Unbilled Revenues			0
6 Sales to Consumers	0		0
6a Sales for Resale			0
7 Other Operating Revenues			0
8 Total Operating Revenues	0		0
Operation & Maintenance			
9 Steam			0
10 Nuclear			0
11 Gas / Other VPC			0
12 Production	0		0
13 Purchased Power	1,149		1,149
14 RPA Exchange			0
15 Sales for Resale			0
16 Wheeling			0
17 Net Variable Power Cost	1,149		1,149
18 Fixed Plant Cost			0
19 Transmission			0
20 Distribution	64,233		64,233
21 Total Fixed O&M	64,233		64,233
22 Customer Accounts			0
23 Customer Service			0
24 Administration & General	441		441
25 Other O&M	441		441
26 Total Operation & Maintenance	65,823		65,823
27 Depreciation & Amortization	0		0
28 Taxes Other than Income	0		0
29 Income Taxes (Non-Federal)	(4,982)		(4,982)
30 Federal Income Tax Net of ITC	(12,788)		(12,788)
31 Deferred Income Taxes	0		0
32 Current/Deferred Taxes True-up	0		0
33 ITC Adjustment	0		0
34 Total Oper. Expenses & Taxes	48,054		48,054
35 Utility Operating Income	(48,054)		(48,054)

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Type I Adjustments	2024 Deferred Expense (1)	Total Type I Adjustments (3)
Average Rate Base		
36 Utility Plant In Service	0	0
37 Accumulated Depeciation		0
38 Acc Def. Income Taxes		0
39 Acc Def. Inv. Tax Credit	0	0
40 Net Utility Plant	0	0

41 Deferred Programs & Investments		0
42 Operating Materials & Fuel		0
43 Misc. Deferred Credits		0
44 Unamortized Ratepayer Gains		0
45 Working Cash	2,029	2,029
46 Total Average Rate Base	2,029	2,029
Income Tax Calculations		
47 Book Revenues	0	0
48 Book Expenses	65,823	65,823
49 Not used		0
50 Int. R-Base @ Wtd Cost Debt	52	52
51 Schedule M Differences	0	0
52 State Taxable Income	(65,875)	(65,875)
53 State Income Tax @ 7.5620436916%	(4,982)	(4,982)
54 Additional Tax Depreciation	0	0
55 Federal Taxable Income	(60,894)	(60,894)
56 Fed Tax @ 21%	(12,788)	(12,788)
57 ITC @ 0%	0	0
58 Current Federal Tax	(12,788)	(12,788)
ITC Adjustment		
59 Deferral	0	0
60 Restoration	0	0
61 Deferred Taxes	0	0
62 Current/Deferred Taxes True-up	0	0
63 Total Income Tax	(17,769)	(17,769)

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Type II Adjustments	Escalation and Period-End Rate Base	Nonrecurring Events	End-of-Period Annualizing Adjustment	blank	Total
	(1)	(2)	(3)	(4)	(5)
1 Residential	0	0	7,296	0	7,296
2 Commercial	0	0	6,988	0	6,988
3 Industrial					0
4 Other Revenue					0
5 Unbilled Revenues					0
6 Sales to Consumers	0	0	14,284	0	14,284
6a Sales for Resale					0
7 Other Operating Revenues					0
8 Total Operating Revenues	0	0	14,284	0	14,284
Operation & Maintenance					
9 Steam					0
10 Nuclear					0
11 Gas / Other VPC		77,641			77,641
12 Production	0	77,641	0	0	77,641
13 Purchased Power	0	(1,149)	5,388	0	4,239
14 RPA Exchange					0
15 Sales for Resale					0
16 Wheeling					0
17 Net Variable Power Cost	0	76,492	5,388	0	81,880
18 Fixed Plant Cost	2,706				2,706
19 Transmission	401				401
20 Distribution	3,316	(64,233)	4,287	0	(56,631)
21 Total Fixed O&M	6,424	(64,233)	4,287	0	(53,523)
22 Customer Accounts/Bad Debt	1,226			0	1,226
23 Customer Service	417				417
24 Admin. & General / OPUC Fee	3,345	(441)	68	0	2,972
25 Other O&M	4,988	(441)	68	0	4,615
26 Total Operation & Maintenance	11,412	11,818	9,743	0	32,972
27 Depreciation & Amortization	0	0	7,426	0	7,426
28 Other Taxes/Franchise Fee	0	0	3,080	0	3,080
29 Income Taxes (Non-Federal)	(2,453)	(894)	(453)	0	(3,800)
30 Federal Inc. Tax Net of ITC	(6,298)	(2,296)	(1,162)	0	(9,755)
31 Deferred Income Taxes	0	0	0	0	0
32 Current/Deferred Taxes True-up	0	0	0	0	0
33 ITC Adjustment	0	0	0	0	0
34 Total Oper. Exp & Taxes	2,661	8,628	18,635	0	29,923
35 Utility Operating Income	(2,661)	(8,628)	(4,351)	0	(15,639)

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	Escalation and Period-End Rate Base	Nonrecurring Events	End-of-Period Annualizing Adjustment	blank	Total
	(1)	(2)	(3)	(4)	(5)
Average Rate Base					
36 Utility Plant In Service	1,030,115				1,030,115
37 Accumulated Depeciation	161,919				161,919
38 Acc Def. Income Taxes	55,192				55,192
39 Acc Def. Inv. Tax Credit	0				0
40 Net Utility Plant	813,004	0	0	0	813,004

41 Deferred Programs & Investments	3,705				3,705
42 Operating Materials & Fuel	(888)				(888)
43 Misc. Deferred Credits	1,544				1,544
44 Unamortized Ratepayer Gains	0				0
45 Working Cash @ 4.221917808 4.22%	6,387	364	787	0	7,538
46 Total Average Rate Base	823,752	364	787	0	824,903
Income Tax Calculations					
47 Book Revenues	0	0	14,284	0	14,284
48 Book Expenses	11,412	11,818	20,249	0	43,479
49 Reverse Env. Tax for Calculation	0	0	0	0	0
50 Int. R-Base @ Wtd Cost of Debt	21,031	9	20	0	21,060
51 Schedule M Differences	0	0	0	0	0
52 State Taxable Income	(32,442)	(11,827)	(5,985)	0	(50,255)
53 State Income Tax @ 7.5620436916% Pollution Control Tax Credit	(2,453)	(894)	(453)	0	(3,800)
54 Net State Taxes					
55 Federal Taxable Income	(29,989)	(10,933)	(5,532)	0	(46,454)
56 Fed Tax @ 21%	(6,298)	(2,296)	(1,162)	0	(9,755)
57 ITC @ 0%	0	0	0	0	0
58 Current Federal Tax	(6,298)	(2,296)	(1,162)	0	(9,755)
ITC Adjustment					
59 Deferral	0	0	0	0	0
60 Restoration	0	0	0	0	0
61 Deferred Taxes	0	0	0	0	0
62 Current/Deferred Taxes True-up	0	0	0	0	0
63 Total Income Tax	(8,751)	(3,190)	(1,614)	0	(13,556)

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COMPOSITE COST OF CAPITAL

Docket UE 416, Order 23-386	Average Outstanding	Percent of Capital	Percent Cost	Weighted Percent Cost
Long Term Debt	N/A	50.00%	4.125%	2.063%
Preferred Stock	N/A	0.00%	0.000%	0.000%
Common Equity	N/A	50.00%	9.500%	4.750%
Total	0	100.00%		6.813%

Actual Averages	Average Outstanding	Percent of Capital	Percent Cost	Weighted Percent Cost
Long Term Debt (a)	4,190,320	55.70%	4.583%	2.553%
Preferred Stock	0	0.00%	0.000%	0.000%
Common Equity	3,332,107	44.30%	10.004%	4.431%
Total	7,522,427	100.00%		6.984%

Actual End of Period	End of Period Outstanding	Percent of Capital	Percent Cost	Weighted Percent Cost
Long Term Debt (a)	4,265,320	55.00%	4.600%	2.530%
Preferred Stock	0	0.00%	0.000%	0.000%
Common Equity	3,490,054	45.00%	6.422%	2.890%
Total	7,755,374	100.00%		5.420%

Note: End of period capital structure and costs used for Pro Forma ROR and ROE calcs.

Order 91-186 Methodology

Interest Adjustment (Utility Tax Adjustment)

	Rate Base	6,966,392
	Wtd Cost of Debt	2.55%
	Int. for tax deduction	177,853
(b)	Int. for tax calculation	207,003
	Utility tax adjust.	(29,150)

Common Equity	Common Equity
Dec '23	3,098,000
Jan '24	3,327,221
Feb '24	3,280,219
Mar '24	3,356,410
Apr '24	3,305,754
May '24	3,307,855
Jun '24	3,310,658
Jul '24	3,260,355
Aug '24	3,311,819
Sep '24	3,363,559
Oct '24	3,430,491
Nov '24	3,436,914
Dec '24	3,490,054

(a) Long Term Debt adjusted for debt issuances by approximately \$104M as a result of 2020 Trading Losses

(b) Long-term debt, short-term debt & other (no AFDC).