



**Portland General Electric Company**  
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portlandgeneral.com

June 25, 2020

***Via Electronic Filing***

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

**Re: UM 1103 PGE's Application for Reauthorization to Defer Intervenor Funding Costs**

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Costs Related to Intervenor Funding, with an effective date of July 01, 2020.

PGE received authorization to continue to defer Intervenor Funding costs through Commission Order No. 19-251. A Notice of Application has been provided to the parties on the UM 1103 and UE 335 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7805, or Alina Nestjorkina at (503) 464-2144.

Please direct all formal correspondence, questions, or requests to the following e-mail address [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com).

Sincerely,

*/s/ Jaki Ferchland*  
Jaki Ferchland  
Manager, Revenue Requirement

JF/np  
Enclosure  
cc: UM 1103 & UE 335 service lists

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1103**

**In the Matter of the Application of  
PORTLAND GENERAL ELECTRIC  
COMPANY for an Accounting Order  
Approving Deferral of Costs Related to  
Intervenor Funding**

**Application for Reauthorization to Defer  
Intervenor Funding Costs**

Pursuant to OAR 860-027-0300; ORS 757.259(3); ORS 757.072; and Public Utility Commission of Oregon (“Commission” or “OPUC”) Order Nos. 03-388, 18-017, and 19-251, Portland General Electric Company (“PGE”) requests reauthorization to defer intervenor funding costs as described below, for the 12-month period July 1, 2020 through June 30, 2021.

**I. Deferral History:**

Commission Order No. 03-388 approved an Intervenor Funding Agreement (“IFA”), pursuant to the Intervenor Funding Act, between PGE, Pacific Power and Light (dba “PacifiCorp”), Northwest Natural Gas Company, Northwest Industrial Gas Users, the Oregon Citizens’ Utility Board (“CUB”), and Industrial Customers of Northwest Utilities (“ICNU”), dated February 3, 2003. This agreement specified the terms and conditions for intervenor funding grants, funding amounts to be contributed by each utility, and the payment of grants by utilities into three funds, which include the CUB Fund, the Pre-authorized Matching Fund, and the Issue Fund.

The Table 1 below lists IFA approvals and amendments.

**Table 1  
Intervenor Funding Approval and Amendments**

	<b>OPUC Order No.</b>	<b>Docket No.</b>	<b>Effective Date</b>	<b>Expiration Date</b>
Original Agreement	03-388	AR 462	7/02/2003	12/31/07
First Amendment	07-564	UM 1357	12/19/2007	12/31/12
Second Amendment	12-452	UM 1357	1/01/2013	12/31/17
Third Amendment	15-335	UM 1357	10/02/15	12/31/17
Fourth Amendment	18-017	UM 1929	1/17/2018	12/31/2022

These amended IFAs clarify the use of funds for dockets, modify terms and conditions, and change the funding amounts to be contributed by each utility. Order No. 18-017 supersedes and replaces all previous IFA orders.

PGE filed an application with the Commission for an order authorizing PGE to defer these costs, which was approved and adopted by Commission Order No. 03-561.

PGE requests reauthorization to defer intervenor funding costs, as described below, for the 12-month period July 1, 2020 through June 30, 2021. Table 2 below, lists the Commission approved reauthorizations for this deferral.

**Table 2**  
**Commission Orders for Reauthorization**

<b>Filing Date</b>	<b>Renewal Period</b>	<b>Order No.</b>	<b>Approval Date</b>
6/26/2019	7/01/19-6/30/20	19-251	7/30/19
6/27/2018	7/01/18-6/30/19	18-316	8/28/18
6/14/2017	7/01/17-6/30/18	17-349	9/14/17
6/23/2016	7/01/16-6/30/17	16-295	8/02/16
6/22/2015	7/01/15-6/30/16	15-269	9/08/15
6/26/2014	7/01/14-6/30/15	14-270	7/01/14
6/27/2013	7/01/13-6/30/14	13-287	8/06/13
6/29/2012	7/01/12-6/30/13	12-311	8/14/12
6/22/2011	7/01/11-6/30/12	11-282	8/01/11
6/15/2010	7/01/10-6/30/11	10-342	9/02/10
6/02/2009	7/01/09-6/30/10	09-268	7/13/09
6/05/2008	7/01/08-6/30/09	08-442	8/28/08
6/07/2007	7/01/07-6/30/08	07-324	7/27/07
6/07/2006	7/01/06-6/30/07	06-412	7/17/06
5/13/2005	7/01/05-6/30/06	05-816	6/29/05
5/20/2004	7/01/04-6/30/05	04-363	6/28/04
8/11/2003	7/01/03-6/30/04	03-561*	9/17/03

*\* Initial application*

Pursuant to the Commission Orders listed above, PGE respectfully requests an Order reauthorizing the deferral for later rate-making treatment of all payments made by PGE between July 1, 2020 and June 30, 2021, to intervenors under the three funds established according to the most recent IFA.

II. **OAR 860-027-0300 Requirements:**

The following is provided pursuant to ORS 860-027-0300(3):

a. Description of Utility Expense or Revenue

For the 12-month period of July 1, 2020 through June 30, 2021, PGE seeks reauthorization to continue recording, in a deferred account, all amounts it is required to pay through the CUB Fund, the Pre-authorized Matching Fund, and the Issue Fund.

b. Reasons for Deferral

Commission Order No. 03-561 authorized PGE's accounting process for the grant funds. PGE has been deferring funds pursuant to the IFA since 2003, and the latest Commission Order No. 19-251, is about to expire. PGE will continue to incur IFA expenses until December 31, 2022, pursuant to the Fourth Amended and Restated IFA, OPUC Order No. 18-017. Without reauthorization, the current authorization to defer costs will expire on June 30, 2020.

PGE requests to continue to use the deferral mechanism as approved in Order 19-251, including any expenses accrued, under the fourth amendment of the IFA. Moreover, PGE requests that the additional amounts it is required to pay to the three funds during the period of July 1, 2020 through June 30, 2021, be treated similarly.

c. Proposed Accounting

PGE proposes to record all deferred costs in FERC Account 182.3, Other Regulatory Assets, with a credit to FERC account 456, Other Revenue. In the absence of a deferred accounting order from the Commission, PGE would record costs associated with the intervenor funding costs to FERC account 928 Regulatory Commission Expenses.

d. Estimates of Amounts to be Recorded for the next 12 months

PGE anticipates the maximum amounts to be deferred, during the 12-month period subsequent

to the filing of this application, are shown in Table 3 below.<sup>1</sup>

**Table 3**  
**Amounts to be Deferred**

<b>CUB FUND</b>	<b>MATCHING FUND</b>	<b>ISSUE FUND</b>
\$101,125	\$77,168	\$143,750

Based on this, PGE estimates the intervenor funding account balances will be as shown in Table 4 below.

**Table 4**  
**Account Balances**

<b>Fund</b>	<b>Balance</b>	<b>Forecasted Deferral</b>	<b>Estimated</b>
<b>Description</b>	<b>May 2020</b>	<b>2020</b>	<b>Balance 2021*</b>
<b>CUB</b>	\$284,942.66	101,125.00	\$386,067.66
<b>Matching</b>	\$221,784.28	77,167.74	\$298,952.02
<b>ISSUE</b>	\$347,795.65	143,750.00	\$491,545.65
		<b>Estimated Total Balance</b>	<b>\$1,110,324.58</b>

*\* does not include amortization and interest*

Exhibit 1 lists the individual postings for each funding account to date. PGE amortized these funds in 2008 through Advice No. 07-029, in 2011 through Advice No. 10-022A, in January 2017 through Advice No. 16-20, and in 2020 through Advice No. 19-32. As the IFA renewal modifies funding payment amounts, PGE will update the accruals and estimated balances as appropriate.

The current IFA permits intervenors to request grants from the various funds at any time during the calendar year, though the proposed deferral period runs from July 1, 2020 to June 30, 2021. Amounts will be debited to the deferral account as funds are dispersed. See Commission Order No. 18-017, Appendix A, Page 12. Balances in the funds may rollover into the following year if intervenors do not

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<sup>1</sup> The Intervenor Funding Agreement (IFA) was amended and restated through OPUC Order No. 18-017, continuing intervenor funding through December 31, 2022, and establishing Annual Grant amounts to be made available for each utility account.

use the entire amount available, and some funds (the CUB and Matching Funds) permit intervenors to request advances from future-year funds.

Pursuant to the terms of the IFA, individual fund costs will be allocated to the appropriate customer class: the CUB fund will be charged to residential customers; the Pre-authorized Matching Fund will be charged to industrial customers, and the Issue Fund costs will be aligned and allocated to the intended beneficiaries of the advocacy undertaken on their behalf.

e. Notice

A copy of the Notice of application for Reauthorization to Defer Intervenor Funding Costs and a list of the persons served with the notice are attached to the application as Attachment A. (OAR 860-027-0300 [6]).

III. The following is provided pursuant to OAR 860-027-0300(4):

a. Description of Deferred Account Entries between July 2020 and June 2021:

Please see Section II (c) and (d) above for estimated entries and projected deferrals through June 30, 2021.

b. The reason for continuing deferred accounting

PGE is seeking approval to continue the IFA Deferral pursuant to the latest Commission Order No. 19-251 as described in Section (II)(b) above, and the new IFA Agreement through December of 2022.

IV. PGE Contacts: The authorized address to receive notices and communications in respect of this application is:

PGE-OPUC Filings  
Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
(503) 464-7805 (telephone)  
E-Mail: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Doug C. Tingey  
Associate General Counsel  
Portland General Electric Company  
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Portland, OR 97204  
(503) 464-8926 (telephone)  
E-Mail: [doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

In addition, the names and addresses to receive notices and communications via the e-mail service list are:

Alina Nestjorkina  
E-Mail: [alina.nestjorkina@pgn.com](mailto:alina.nestjorkina@pgn.com)

V. Summary of Filing Conditions:

Information related to future amortization is listed below:

a. Earnings Review: None Required. The deferral is made in accordance with Commission Order No. 03-388, which states: “The Commission shall allow the Participating Public Utilities to recover in rates all amounts paid for Intervenor Funding Grants under this Agreement. If a Participating Public Utility seeks rate recovery through a deferred account, the account and amortization of the account shall be exempt from the amortization caps and earnings test set forth in subsections 5, 6, 7, 8 and 10 of ORS 757.259.” The IFA’s term was renewed through OPUC Order 18-017 and expires in December 2022.

b. Prudence: A prudence review will be performed prior to amortization.

c. Sharing (Percents): Not subject to sharing mechanism.

d. Rate Spread/Rate Design: See Section II (c) above. Rates are spread on a cents per kilowatt-hour basis to the appropriate customer classes per OPUC Order 18-017, Appendix A, Page 27.

e. Three Percent Test [(ORS 757.259(6))]: The three percent does not apply to amortization of this deferral.

VI. Conclusion

For the reasons stated above, PGE requests authorization to defer any additional Intervenor Funding costs paid by PGE during the period July 01, 2020 to June 30, 2021.

DATED this 25<sup>th</sup> day of June, 2020.

Respectfully Submitted,

*/s/ Jaki Ferchland*

Jaki Ferchland  
Manager, Revenue Requirement  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
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**UM 1103**

**Exhibit 1**

**Funding Account Listing**

**UM 1103**

**Exhibit 1**

(PGE Intervenor Funding Postings)

**Deferral Period July 2019 through June 2020**

see also docket UM 1929

6/25/2020

Date	ISSUE FUND AWO 7000000891 (D17136)				CUB FUND AWO 7000000888 (D17134)			MATCHING FUND AWO 7000000889 (D17135)		
	Issue Fund	Amount	Docket #	Party	Cub Fund	Amount	Docket #	Matching Fund	Amount	Docket #
	<b>2019</b>	19-287	\$14,071.00	UE-358	CUB	19-004	101,125	UM 1929	19-126	43,095.06
	19-289	\$22,436.46	LC 73	CUB						
	19-296	\$12,148.00	UE-359	CUB						
	19-326	\$33,492.45	UE 359	AWEC(ICNU)						
	19-413	\$10,000.00	LC 73	AWEC						
								19-318	33,387.62	UM 1929

**UM 1103**

**Attachment A**

**Notice of Application for Reauthorization  
to Defer Intervenor Funding Costs**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1103**

**In the Matter of the Application of  
PORTLAND GENERAL ELECTRIC  
COMPANY for an Accounting Order  
Approving Deferral of Costs Related to  
Intervenor Funding**

**Notice of Application for  
Reauthorization to Defer Intervenor  
Funding Costs**

On June 25, 2020, Portland General Electric Company ("PGE") filed an Application with the Public Utility Commission of Oregon (the "Commission" or "OPUC") for an Order reauthorizing deferral of its intervenor funding costs.

Approval of PGE's application will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Persons who wish to obtain a copy of PGE's application will be able to access it on the OPUC website.

Any person who wishes to submit written comments to the Commission on PGE's application must do so no later than July 25, 2020.

Dated this 25<sup>th</sup> day of June, 2020.

*/s/ Jaki Ferchland*

Jaki Ferchland  
Manager, Revenue Requirement  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Reauthorization to Defer Intervenor Funding Costs** to be served by electronic mail to those parties whose e-mail addresses appear on the attached service lists for OPUC Dockets No. UM 1103 and UE 335.

Dated at Portland, Oregon, this 25<sup>th</sup> day of June, 2020.

*/s/ Jaki Ferchland*

**Jaki Ferchland**

Manager, Revenue Requirement

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**SERVICE LIST**  
**OPUC DOCKET # UM 1103**

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