



**Portland General Electric Company**  
121 SW Salmon Street • Portland, Oregon 97204  
PortlandGeneral.com

June 14, 2017

***E-File***

*puc.filingcenter@state.or.us*

Public Utility Commission of Oregon  
201 High Street, SE  
P. O. Box 1088  
Salem, OR 97308-1088

**Attn: Commission Filing Center**

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

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization to Defer Intervenor Funding Costs associated with Intervenor Funding, with an effective date of July 01, 2017.

PGE received authorization to continue to defer expenses through OPUC Order 16-295. A Notice of Application has been provided to the parties on the UM 1103 and UE 319 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-8929, or Launa Harmon at (503) 464-7251.

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,

A handwritten signature in blue ink, appearing to read "Stefan Brown". The signature is fluid and cursive, written over a white background.

Stefan Brown  
Manager, Regulatory Affairs

encls.

cc: UM 1103 & UE 319 service lists

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1103**

In the Matter of the Application of	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	Application For Reauthorization
For an Accounting Order Approving Deferral of Costs	)	To Defer Intervenor Funding
Related to Intervenor Funding	)	Costs

Pursuant to OAR 860-027-0300, ORS 757.259 (3), ORS 757.072, the Public Utility Commission of Oregon (“Commission”) Intervenor Funding Orders No. 03-388 and 15-335, and the latest reauthorization, Commission Order No. 16-295, which approved the Intervenor Funding Deferral of Portland General Electric Company (“PGE”). PGE requests reauthorization to defer intervenor funding costs as described below, for the 12-month period July 1, 2017 through June 30, 2018.

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, Citizens’ Utility Board of Oregon (“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.

On December 19, 2007, the Commission approved the First Amended and Restated IFA, extending intervenor funding through December 12, 2012 (Order 07-564). On November 20, 2012, a Second Amended and Restated IFA became effective through Order No. 12-452, renewing the term through December 31, 2017. On October 2, 2015, a Third Amended and Restated IFA became effective through Order No. 15-335. This Amendment continues the term of the IFA through

December 31, 2017, however PGE expects the IFA will be renewed. 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. Until such time as the IFA is renewed for an additional term, Order No. 15-335 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 the Commission on September 11, 2003, in Order No. 03-561.

PGE requests annual reauthorizations to defer intervenor funding costs, as described below, for the 12-month period July 1, 2017 through June 30, 2018. The table below itemizes the annual reauthorizations of this deferral.

**Table 1**

Filing Date	Renewal Period	Order No.	Approval Date
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 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, 2017 and June 30, 2018, to intervenors under the three intervenor funds established according to the most recent IFA.

**II. OAR 860-027-0030 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, 2017 through June 30, 2018, PGE seeks reauthorization to continue recording, in a deferred account, all amounts it is required to pay to 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. 16-295, is about to expire. PGE will continue to incur IFA expenses until December 31, 2017, pursuant to OPUC Order No. 16-295, and the Third Amended IFA, OPUC Order No. 15-335. Without reauthorization, the current authorization to defer costs will expire on June 30, 2017.

PGE requests that the deferral continue. PGE wishes to continue to use the deferral mechanism as approved in Order 16-295, including any expenses accrued, under the third 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, 2017 through June 30, 2018, be treated similarly.

c. Proposed Accounting

PGE proposes to record all deferred costs in FERC Account 182.3 (Other Regulatory Assets). 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, will be:<sup>1</sup>

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<sup>1</sup> The Intervenor Funding Agreement (IFA) was amended and restated through OPUC Order No. 15-335, continuing intervenor funding through December 31, 2017, and establishing Annual Grant amounts to be made available for each utility account.

<b>CUB FUND</b>	<b>MATCHING FUND</b>	<b>ISSUE FUND</b>
\$66,125	\$66,125	\$143,750

Based on this, PGE estimates the intervenor funding account balances will be:

<b>Fund Description</b>	<b>Balance June 01 2017</b>	<b>Accrual 2018*</b>	<b>Estimated Balance 2018</b>
<b>CUB</b>	258,562.23	66,125	324,687.23
<b>Matching</b>	167,342.04	66,125	233,467.04
<b>ISSUE</b>	576,795.59	143,750	<u>720,545.59</u>
	<b>Estimated Total Balance</b>		<b>1,278,699.86</b>

*\*subject to change if amounts are amended through a renewal of the IFA.*

See Attachment B for a listing of the individual postings for each funding account. PGE amortized these funds in 2008 through Advice No. 07-029, and in 2011 through Advice No. 10-22A. If the IFA renewal modifies funding payment amounts, PGE will update those accruals and estimated balances as appropriate. See Attachment B for a listing of 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, and in January 2017 through Advice No. 16-20.

The current IFA permits intervenors to request grants from the various funds at any time during the calendar year, though this deferral period runs from July 1, 2016 to June 30, 2017. Amounts will be debited to the deferral account as funds are actually disbursed. See Commission Order No. 15-335, Appendix A, Page 11. Balances in the funds may rollover into the following year if intervenors do not 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 2017 and June 2018:

Please see section II (d) above for estimated balances and accruals as of June 30, 2017.

b. The reason for continuing deferred accounting

PGE is seeking approval to continue the IFA Deferral pursuant to the latest Commission Order No. 16-295 as described in Section (II)(b) above. Although the IFA Agreement expires in December of 2017, PGE expects it will be renewed and the term extended.

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

Stefan Brown  
Manager, Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
(503) 464-8929 (telephone)  
(503) 464-7651 (facsimile)  
E-Mail: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Doug C. Tingey  
Associate General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, OR 97204  
(503) 464-8926 (telephone)  
(503) 464-2200 (facsimile)  
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:

Launa Harmon  
E-Mail: [Launa.Harmon@pgn.com](mailto:Launa.Harmon@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." This is reiterated in part through Commission Order No. 15-335, Appendix A, Page 25. Although the IFA's term expires in December of 2017, PGE expects a new IFA will extend the term period.

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.

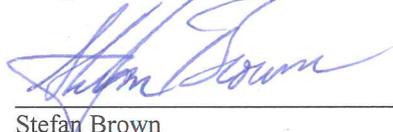
e. Three Percent Test [(ORS 757.259(6))]: The three percent does not apply to the amortization of this deferral.

VI. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the existing balances in the deferred account and authorization to defer any additional Intervenor Funding costs paid by PGE during the period July 01, 2017 to June 30, 2018.

DATED this 14th day of June, 2017.

Respectfully Submitted,



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Stefan Brown  
Manager, Regulatory Affairs,  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503-464-8929  
Fax: 503-464-7651  
E-Mail: [stefan.brown@pgn.com](mailto:stefan.brown@pgn.com)

**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 Order to Reauthorize the Deferral of Intervenor Funding Costs      Notice of Application for Reauthorization To Defer Intervenor Funding Costs

On June 14, 2017, Portland General Electric Company ("PGE") filed an Application with the Public Utility Commission of Oregon (the "Commission") 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 14, 2017.

Dated this 14<sup>th</sup> day of June, 2017.



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Stefan Brown  
Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503-464-8929  
Fax: 503-464-7651  
E-Mail: [stefan.brown@pgn.com](mailto:stefan.brown@pgn.com)

**UM 1103**

**Attachment B**

**Postings to Individual Funding Accounts**

**CUB Fund**

**ICNU Matching Fund**

**and**

**Issue Fund**



## 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 319.

Dated at Portland, Oregon, this 14<sup>th</sup> day of June, 2017.



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**Stefan Brown**

Manager, Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503-464-8929  
Fax: 503-464-7651  
E-Mail: [stefan.brown@pgn.com](mailto:stefan.brown@pgn.com)

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

PGE RATES & REGULATORY AFFAIRS	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com
STEFAN BROWN PORTLAND GENERAL ELECTRIC	121 SW SALMON ST, 1WTC0306 PORTLAND OR 97204 stefan.brown@pgn.com
DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC	121 SW SALMON 1WTC1301 PORTLAND OR 97204 doug.tingey@pgn.com
PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 judy.johnson@state.or.us
MICHAEL T WEIRICH PUC STAFF--DEPARTMENT OF JUSTICE	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us

# SERVICE LIST

## OPUC DOCKET UE 319

### CALPINE ENERGY

GREGORY M. ADAMS (C)  
RICHARDSON ADAMS, PLLC

PO BOX 7218  
BOISE ID 83702  
greg@richardsonadams.com

GREG BASS  
CALPINE ENERGY SOLUTIONS, LLC

401 WEST A ST, STE 500  
SAN DIEGO CA 92101  
greg.bass@calpinesolutions.com

KEVIN HIGGINS (C)  
ENERGY STRATEGIES LLC

215 STATE ST - STE 200  
SALT LAKE CITY UT 84111-2322  
khiggins@energystrat.com

### FRED MEYER UE 319

KURT J BOEHM (C)  
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510  
CINCINNATI OH 45202  
kboehm@bkllawfirm.com

JODY KYLER COHN  
BOEHM, KURTZ & LOWRY

36 E SEVENTH ST STE 1510  
CINCINNATI OH 45202  
jkyl@bkllawfirm.com

### INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

MYRALEIGH ALBERTO (C)  
DAVISON VAN CLEVE

333 SW TAYLOR STE 400  
PORTLAND OR 97204  
maa@dvclaw.com

BRADLEY MULLINS (C)  
MOUNTAIN WEST ANALYTICS

333 SW TAYLOR STE 400  
PORTLAND OR 97204  
brmullins@mwanalytics.com

TYLER C PEPPE (C)  
DAVISON VAN CLEVE, PC

333 SW TAYLOR SUITE 400  
PORTLAND OR 97204  
tcp@dvclaw.com

### OREGON CITIZENS UTILITY BOARD

OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
dockets@oregoncub.org

ROBERT JENKS (C)  
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
bob@oregoncub.org

ELIZABETH JONES (C)  
OREGON CITIZENS' UTILITY BOARD

610 SW BROADWAY, STE 400  
PORTLAND OR 97206  
liz@oregoncub.org

### PACIFICORP UE 319

PACIFICORP, DBA PACIFIC POWER

825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
oregondockets@pacificorp.com

MATTHEW MCVEE  
PACIFICORP

825 NE MULTNOMAH  
PORTLAND OR 97232  
matthew.mcvee@pacificorp.com

**PGE UE 319**

STEFAN BROWN (C)  
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST, 1WTC0306  
PORTLAND OR 97204  
stefan.brown@pgn.com

DOUGLAS C TINGEY  
PORTLAND GENERAL ELECTRIC

121 SW SALMON 1WTC1301  
PORTLAND OR 97204  
doug.tingey@pgn.com

JAY TINKER (C)  
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST 1WTC-0306  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

**SBUA UE 319**

JAMES BIRKELUND (C)  
SMALL BUSINESS UTILITY ADVOCATES

548 MARKET ST STE 11200  
SAN FRANCISCO CA 94104  
james@utilityadvocates.org

DIANE HENKELS (C)  
CLEANTECH LAW PARTNERS PC

420 SW WASHINGTON ST STE 400  
PORTLAND OR 97204  
dhenkels@cleantechlaw.com

**STAFF UE 319**

STEPHANIE S ANDRUS (C)  
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
stephanie.andrus@state.or.us

MARIANNE GARDNER (C)  
PUBLIC UTILITY COMMISSION OF OREGON

PO BOX 1088  
SALEM OR 97308-1088  
marianne.gardner@state.or.us

SOMMER MOSER (C)  
PUC STAFF - DEPARTMENT OF JUSTICE

1162 COURT ST NE  
SALEM OR 97301  
sommer.moser@doj.state.or.us

**WALMART UE 323**

VICKI M BALDWIN (C)  
PARSONS BEHLE & LATIMER

201 S MAIN ST STE 1800  
SALT LAKE CITY UT 84111  
vbaldwin@parsonsbehle.com

STEVE W CHRISS (C)  
WAL-MART STORES, INC.

2001 SE 10TH ST  
BENTONVILLE AR 72716-0550  
stephen.chriss@wal-mart.com