



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

June 23, 2016

*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, 2016.

PGE received authorization to continue to defer expenses through OPUC Order 15-269. A Notice of Application has been provided to the parties on the UM 1103 and UE 294 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-8937, 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", is written over a blue ink scribble.

Stefan Brown  
Manager, Regulatory Affairs

encls.

cc: UM 1103 and UE 294 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 Oregon Public Utility Commission (the "Commission") Intervenor Funding Orders No. 03-388 and 15-335, and the latest reauthorization, Commission Order No. 15-269, which approved Portland General Electric Company's ("PGE's") Intervenor Funding Deferral, PGE requests reauthorization to defer intervenor funding costs, as described below, for the 12-month period July 1, 2016 through June 30, 2017.

I. Deferral History:

Commission Order No. 03-388 approved an agreement, 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, the Intervenor Funding Agreement ("IFA"). 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 OPUC approved the First Amended and Restated Intervenor Funding Agreement ("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. These amendments continue

the term of the IFA through December 31, 2017. These three 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. 15-335 supersedes and replaces all previous IFA orders.

PGE filed an application with the OPUC for an accounting 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, 2016 through June 30, 2017. The table below itemizes the annual reauthorizations of this deferral.

**Table 1**

Filing Date	Renewal Period	Order No.	Approval Date
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, 2016 and June 30, 2017, 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, 2016 through June 30, 2017, 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. 15-269, is about to expire. PGE will continue to incur IFA expenses until December 31, 2017, pursuant to OPUC Order No. 15-269, and the Third Amended IFA, OPUC Order No. 15-335. Without reauthorization, the current authorization to defer costs will expire on June 30, 2016.

PGE requests that the deferral continue. PGE wishes to continue to use the deferral mechanism as approved in Order 15-269, including any expenses accrued, under a 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, 2016 through June 30, 2017, 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. Amounts Subject to Deferral and Estimates of Amounts

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 2016</b>	<b>Accrual 2017</b>	<b>Estimated Balance 2017</b>
<b>CUB</b>	320,330.62	66,125	386,455.62
<b>Matching</b>	211,282.06	66,125	277,407.06
<b>ISSUE</b>	694,627.20	143,750	<u>838,377.20</u>
	Estimated Total Balance		\$1,502,239.88

See Attachment B<sup>2</sup> 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. 10-022A.

The 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 to June 30. Amounts will be debited to the deferral account as funds are actually disbursed. See Commission Order No. 03-561, Appendix A, Page 3. 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

<sup>2</sup> Provided at the request of the OPUC Staff in late 2015.

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 2016 and June 2017:

Please see section II (d) above for estimated balances and accruals as of June 30, 2016.

b. The reason for continuing deferred accounting

PGE is seeking approval to continue the IFA Deferral pursuant to the latest Commission Order No. 15-269 as described in Section (II)(b) above.

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

Stefan Brown  
Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
(503) 464-8929 (telephone)  
(503) 464-7651 (facsimile)  
[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, 1 WTC1301  
Portland, OR 97204  
(503) 464-8926 (telephone)  
(503) 464-2200 (facsimile)  
[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<sup>3</sup>:

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

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<sup>3</sup> PGE and OPUC Staff agreed to provide a summary of filing conditions on January 24, 2012.

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 4, 5, 7 and 10 of ORS 757.259.” This is reiterated in part through Commission Order No. 15-335, Appendix A, Page 27.

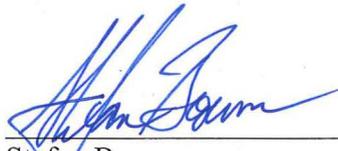
- b. Prudence: A prudence review will be performed prior to amortization.
- c. Sharing (Percents): Not subject to sharing mechanism.
- d. Rate Spread/Rate Design: See Section II ( c ) above. Rates are spread on a cents per kilowatt-hour basis.
- e. Three Percent Test [(ORS 757.259(6))]: The three percent 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, 2016 to June 30, 2017.

DATED this 23rd day of June, 2016.

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)

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**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 23, 2016, Portland General Electric Company ("PGE") filed an Application with the Oregon Public Utility Commission (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 22, 2016.

Dated this 23rd day of June, 2016.

  
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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)

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**UM 1103**

**Attachment B**

**Postings to Individual Funding Accounts**

**CUB Fund**

**ICNU Matching Fund**

**and**

**Issue Fund**

**UM 1103 Exhibit B**  
**(PGE Intervenor Funding Postings)**  
**Deferral Period July 2015 through June 2016**

Date	ISSUE FUND AWO 70000000891 (D17136)				CUB FUND AWO 70000000888 (D17134)			MATCHING FUND AWO 70000000889 (D17135)		
	Issue Fund	Amount	Docket #	Notes	Cub Fund	Amount	Docket #	Matching Fund	Amount	Docket #
	2014	14-011	8,333.00	UM 1633	CUB	14-008	66,125.00	UM 1357		
	14-120	4,296.13	UE 262	ICNU						
	14-140	1,100.03	UM 1616	ICNU						
	14-143	8,304.23	UM 1633	ICNU						
	14-172	8,333.00	UM 1633	CUB						
	14-307	67,212.00	UE-283	ICNU						
	14-309	28,980.61	UE-286	ICNU						
	14-328	5,925.44	UM-1679	CUB						
	14-329	10,926.40	UE-286	CUB						
	14-362	67,461.90	UE-283	CUB						
	14-407	15,288.60	LC-56	CUB						
	14-411	3,224.50	UM-1690	CUB						
	14-418	1,256.66	UE-286	ICNU						
2015	15-187	775.50	UM 1690	CUB	15-001	66,125.00	UM 1357	15-101	66,092.13	UM 1357
	15-240	50,000.00	UE 294	CUB						
	15-252	8,000.00	UM 1663	CUB						
	15-277	54,552.00	UE 294	ICNU						
	15-302	4,000.00	UM 1713	ICNU						
	15-312	9,491.02	UM 1662	ICNU						
	15-376	8,238.50	UM 1662	CUB						
	15-378	10,000.00	UM 1713	CUB						
2016	16-058	7,551.75	UM -1662	ICNU	16-004	66125	UM 1357	16 082	19,154.42	UM 1357
	16-199	1,452.00	UM 1719	ICNU						

## 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 294.

Dated at Portland, Oregon, this 23rd day of June, 2016.



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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**

STEPHANIE S ANDRUS  
PUC STAFF--DEPARTMENT OF JUSTICE

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

PATRICK G HAGER  
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST 1WTC0306  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

LAUNA HARMON  
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST - 1WTC0306  
PORTLAND OR 97204  
launa.harmon@pgn.com

JUDY JOHNSON  
PUBLIC UTILITY COMMISSION OF  
OREGON

PO BOX 1088  
SALEM OR 97308-1088  
judy.johnson@state.or.us

DOUGLAS C TINGEY  
PORTLAND GENERAL ELECTRIC

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

**SERVICE LIST  
OPUC DOCKET UE 294**

Judy Johnson (C) PUBLIC UTILITY COMMISSION OF OREGON <a href="mailto:judy.johnson@state.or.us">judy.johnson@state.or.us</a>	Johanna Riemenschneider (C) PUC – DEPARTMENT OF JUSTICE <a href="mailto:Johanna.riemenschneider@state.or.us">Johanna.riemenschneider@state.or.us</a>
Douglas C. Tingey (C) PORTLAND GENERAL ELECTRIC COMPANY <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a>	Jay Tinker (C) PORTLAND GENERAL ELECTRIC COMPANY <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a>
OPUC Docket CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a>	Robert Jenks (C) CITIZENS' UTILITY BOARD OF OREGON <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>
	Greg Bass (C) NOBLE AMERICAS ENERGY SOLUTIONS <a href="mailto:gbass@noblesolutions.com">gbass@noblesolutions.com</a>
Kevin Higgins (C) ENERGY STRATEGIES LLC <a href="mailto:khiggins@energystrat.com">khiggins@energystrat.com</a>	Gregory Adams RICHARDSON ADAMS PLLC <a href="mailto:greg@richardsonadams.com">greg@richardsonadams.com</a>
S Bradley Van Cleve (C) DAVISON VAN CLEVE PC <a href="mailto:bvc@dvclaw.com">bvc@dvclaw.com</a>	Tyler C. Pepple (C) DAVISON VAN CLEVE PC <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a>
Bradley Mullins (C) DAVISON VAN CLEVE PC <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a>	Diane Henkels CLEANTECH LAW PARTNERS, PC <a href="mailto:dhenkels@cleantechlaw.com">dhenkels@cleantechlaw.com</a>
James Birkeland SMALL BUSINESS UTILITY ADVOCATES <a href="mailto:James@utilityadvocates.org">James@utilityadvocates.org</a>	Wendy Gerlitz (C) NW ENERGY COALITION <a href="mailto:wendy@nwenergy.org">wendy@nwenergy.org</a>
Nona Soltero FRED MEYER STORES/KROGER <a href="mailto:Nona.soltero@fredmeyer.com">Nona.soltero@fredmeyer.com</a>	Erin Apperson PACIFIC POWER <a href="mailto:erin.apperson@pacificorp.com">erin.apperson@pacificorp.com</a>
Kurt Boehm BOEHM KURTZ & LOWRY <a href="mailto:kboehm@bkllawfirm.com">kboehm@bkllawfirm.com</a>	Oregon Dockets PACIFICORP, DBA PACIFIC POWER <a href="mailto:oregondockets@pacificorp.com">oregondockets@pacificorp.com</a>
	Jody Cohn BOEHM KURTZ & LOWRY <a href="mailto:jkyler@bkllawfirm.com">jkyler@bkllawfirm.com</a>