



**Portland General Electric Company**  
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June 26, 2025

***Via Electronic Filing***

Public Utility Commission of Oregon  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: UM 1103 PGE's Application for Deferral of Costs Related to Intervenor Funding**

Attention 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, 2025.

PGE received authorization to continue to defer Intervenor Funding costs through Commission Order No. 24-182. A Notice of Application has been provided to the parties on the UM 1103 and UE 435 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-8644 or Tom Kenny at (503) 547-3116.

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/ Greg Batzler*

Greg Batzler  
Manager, Revenue Requirement

GB/dm  
Enclosure  
cc: UM 1103 and UE 435 service lists

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1103**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Application for Deferral of Costs Related to  
Intervenor Funding

**PORTLAND GENERAL ELECTRIC  
COMPANY’S APPLICATION FOR  
DEFERRAL REAUTHORIZATION**

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, 22-506, 22-451, 23-033, and 25-025, Portland General Electric Company (PGE) requests reauthorization to defer intervenor funding costs as described below, for the 12-month period July 1, 2025 through June 30, 2026.

I. Deferral History:

In Order No. 03-388, the Commission 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.

Table 1 below lists amendments to the IFA as well as the intervenor funding agreement pursuant to HB 2475 for environmental justice communities, and the associated Commission orders.

**Table 1  
Intervenor Funding Approval and Amendments**

<b>IFA</b>	<b>OPUC Order No.</b>	<b>Docket No.</b>	<b>Effective Date</b>	<b>Expiration Date</b>
Original Agreement	03-388	AR 462	07/02/03	12/31/07
First Amendment	07-564	UM 1357	12/19/07	12/31/12
Second Amendment	12-452	UM 1357	01/01/13	12/31/17
Third Amendment	15-335	UM 1357	10/02/15	12/31/17
Fourth Amendment	18-017	UM 1929	01/17/18	12/31/22
Fifth Amendment	22-506	UM 2264	12/29/22	12/31/27
<b>Justice Funding Agreement (JFA)</b>	<b>OPUC Order No.</b>	<b>Docket No.</b>	<b>Effective Date</b>	<b>Expiration Date</b>
Interim Agreement	22-043	UM 2211	02/10/22	N/A
Agreement	23-033	UM 2211	02/08/23	12/31/24
Extension of Agreement	24-337	UM 2211	10/01/24	12/31/25

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. In Order No. 22-506, the Commission approved the Fifth Amendment, which supersedes and replaces all previous IFA orders. The Fifth Agreement continues the three funds from which intervenor funding grants can be made while adding a separate account for the Issue Fund called the Case-Certified Account. This new account will ensure that a minimum level of funding will be available for case-certified entities even when an Issue Fund account might otherwise be depleted.

House Bill (HB) 2475 was enacted into state law on September 25, 2021, and took effect on January 1, 2022. Section 3 of HB 2475 amended ORS 757.072 to allow for intervenor funding (in addition to the intervenor funding made available under the IFA) for environmental justice and low-income organizations with the total aggregate financial assistance to all organizations that represent low-income residential customers and/or residential customers that are members of

environmental justice communities not to exceed \$500,000 annually. As a result of this amendment to ORS 757.072, on February 10, 2022, through Order No. 22-043, the Commission approved an interim agreement for interim funding for environmental justice and low-income organizations that included provisions for the deferral and amortization of intervenor funding made available under interim intervenor funding agreements (“Interim Intervenor Funding Agreements”). Since then, the Commission approved a justice funding agreement (JFA) for environmental justice and low-income organizations consistent with HB 2475, through Order No. 23-033 and further extended that JFA through December 2025 through Order No. 24-337. Cost recovery and any associated deferral of any intervenor funding made available under the JFA are authorized by Order No. 24-337 and by Commission rule adopted pursuant to Order No. 23-137 (AR 652, OAR 860-001-0900).

PGE filed an application with the Commission for an order authorizing PGE to defer IFA costs, which was approved and adopted by Commission Order No. 03-561. PGE also filed an application with the Commission for an order authorizing PGE to defer both IFA costs and Interim Intervenor Funding Agreements costs, which was approved and adopted by Commission Order No. 24-182. PGE requests reauthorization to defer intervenor funding costs (inclusive of intervenor funding made available under both the IFA and JFA), as described below, for the 12--month period July 1, 2025, through June 30, 2026. 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>
6/30/2024	7/01/24-6/30/25	25-025	2/5/2025
6/30/2023	7/01/23-6/30/24	24-182	6/11/2024
6/29/2022	7/01/22-6/30/22	22-451	11/18/22
6/29/2021	7/01/21-6/30/22	21-255	8/12/21
6/25/2020	7/01/20-6/30/21	21-069	2/25/21
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, 2025 and June 30, 2026, to intervenors under the most recent IFA, and to intervenors under the JFA.

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

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

a. Description of Utility Expense or Revenue

For the 12-month period of July 1, 2025, through June 30, 2026, 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, the Issue Fund (General Account and Case-Certified Account), and the JFA.

b. Reasons for Deferral

Commission Order No. 03-561 authorized PGE's accounting process for the IFA grant funds. Commission Order No. 23-033 authorized PGE to defer for later amortization intervenor funding made available under the JFA. PGE has been deferring funds pursuant to the IFA since 2003, and the latest Commission Order No. 25-025, is about to expire. PGE will continue to incur IFA expenses until December 31, 2027, pursuant to the Fifth Amended and Restated IFA, approved by the Commission through Order No. 22-506. Without reauthorization, the current authorization to defer costs will expire on June 30, 2025.

PGE requests to continue to use the deferral mechanism as approved in Order No. 25-025, including any expenses accrued, under the fifth amendment of the IFA, and the JFA. Moreover, PGE requests that the additional amounts it is required to pay to the six funds during the period of July 1, 2025, through June 30, 2026, 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 estimates the following amounts could be deferred, during the 12-month period after

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

**Table 3  
Funds and Amounts to be Deferred**

<b>Fund</b>	<b>Amounts to be Deferred</b>
CUB Fund	\$0
Pre-Authorized Matching Fund	\$346,315
Issue Fund (General Account)	\$22,500
Issue Fund (Case-Certified Account)	\$0
JFA Pre-Certification Fund	\$0
JFA Case Fund	\$0

Based on this, PGE estimates the following intervenor funding account balances 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 2025</b>	<b>2025</b>	<b>Balance 2026*</b>
<b>CUB</b>	\$123,249	\$0	\$123,249
<b>Matching</b>	\$603,630	\$346,315	\$949,945
<b>ISSUE (General and Case-Cert)</b>	\$329,430	\$22,500	\$351,930
<b>JFA (Interim, Pre-Cert, Case)</b>	\$179,036	\$0	\$179,036
		<b>Estimated Total Balance</b>	<b>\$1,604,160</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, in 2020 through Advice No. 19-32, in 2023 through Advice No. 22-40, and in 2024 through Advice no. 24-35. As the IFA renewal modifies funding payment

<sup>1</sup> The Intervenor Funding Agreement (IFA) was amended and restated through OPUC Order No. 22-506, continuing intervenor funding through December 31, 2027, and establishing Annual Grant amounts to be made available for each utility account.

amounts, PGE will update the accruals and estimated balances as appropriate.

The current IFA and JFA<sup>2</sup> permit intervenors to request grants from the various funds at any time during the calendar year, though the proposed deferral period runs from July 1, 2025, to June 30, 2026. Amounts will be debited to the deferral account as funds are dispersed.<sup>3</sup> Subject to certain conditions, balances in the funds may roll over 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. Pursuant to the terms of the JFA, the Commission will decide as to how to recover the Justice Funding grants from the various customer classes of the affected Participating Public Utility or Utilities.

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 2025 and June 2026:

Please see Section II (c) and (d) above for estimated entries and projected deferrals

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<sup>2</sup> Justice Funding Pre-Certification Fund applications for any given year are due by November 10 of the prior year. If an intervenor achieves pre-certification, this serves as their grant request. Justice Funding Case Fund grant requests are similar to the current IFA guidelines.

<sup>3</sup> See Commission Order No. 22-506, Appendix A, Page 12

through June 30, 2026.

b. The reason for continuing deferred accounting

PGE seeks approval to continue the IFA Deferral pursuant to the latest Commission Order No. 25-025 as described in Section (II)(b) above, and the latest IFA through December 2027 and JFA through December 2024.

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  
Phone: (503) 464-8929  
E-Mail: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

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Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, OR 97204  
Phone: (971) 489-3933  
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In addition, the names and addresses to receive notices and communications via the email service list are:

Tom Kenny, Regulatory Analyst  
E-Mail: [thomas.kenny@pgn.com](mailto:thomas.kenny@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 Nos. 03-388, 22-506, 22-043, and 23-033, which state that the Commission shall allow the Participating Public Utilities to recover in rates all amounts paid for intervenor funding made available under the IFA (as amended) and JFA. 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 Commission Order No. 22-506 and expires in December

2027. The JFA's term was created through Commission Order No. 23-033 and extended through Commission Order No. 24-337, it expires in December 2025.

- b. Prudence: None required.
- c. Sharing: Intervenor funding costs are not subject to a sharing mechanism.
- d. Rate Spread/Rate Design: Rates are spread on a cents per kilowatt-hour basis to the appropriate customer classes per Commission Order 22-506, Appendix A, Page 28.
- 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 1, 2025, to June 30, 2026.

DATED this 26<sup>th</sup> day of June 2025.

Respectfully Submitted,

*/s/ Greg Batzler*

Greg Batzler  
Manager, Revenue Requirement  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
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UM 1103

Exhibit 1

Funding Account Listing

**The Exhibit has been retained in its native format**

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

PORTLAND GENERAL ELECTRIC  
COMPANY

Application for Deferral of Costs Related to  
Intervenor Funding

**PORTLAND GENERAL ELECTRIC  
COMPANY'S NOTICE OF  
APPLICATION FOR DEFERRAL  
REAUTHORIZATION**

On June 26, 2025, Portland General Electric Company (PGE) filed an Application with the Public Utility Commission of Oregon (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 31, 2025.

Dated this 26th day of June 2025.

*/s/ Greg Batzler*

Greg Batzler

Manager, Revenue Requirement

Portland General Electric Company

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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 Docket Nos. UM 1103 and UE 435.

Dated at Portland, Oregon, this 26<sup>th</sup> day of June 2025.

*/s/ Greg Batzler*

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

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