



Portland General Electric Company
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June 30, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street, Ste. 100
P. O. Box 1088
Salem, OR 97308-1088

Re: UM 2019 PGE's Application to Update Prior Reauthorization Request and Reauthorize Deferred Accounting of Costs Associated with Wildfire Risk Mitigation Measures

Enclosed for filing is Portland General Electric Company's (PGE) application to update its prior reauthorization request and reauthorize deferred accounting of costs associated with wildfire risk mitigation measures.

A Notice regarding the filing of this application has been provided to the parties on the UM 2019 and UE 394 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488.

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

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

JF/np

Enclosure
cc: Service Lists: UE 394, UM 2019

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2019

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

Deferral of Costs Related to Wildfire Risk
Mitigation Measures

**Application to (1) Update Prior
Reauthorization Request and (2)
Reauthorize Deferred Accounting of Costs
Associated with Wildfire Risk Mitigation
Measures**

Pursuant to ORS 757.259, OAR 860-027-0300, Commission Order No. 22-129, and Senate Bill (SB) 762, Portland General Electric Company (PGE) hereby submits this application to (1) update PGE’s request for deferral reauthorization that was filed July 1, 2021 (“2021 Deferral Application”) and (2) request reauthorization to defer for later rate-making treatment incremental and decremental expenses and capital associated with PGE’s wildfire mitigation activities and the expenses and capital incurred in the development, implementation, and operation of PGE’s wildfire protection plans¹ for the period of January 1, 2022 through December 31, 2022. PGE will make a subsequent filing for approval of a rate schedule and automatic adjustment clause with an associated balancing account mechanism consistent with SB 762.

In support of the application (Application) PGE states:

1. PGE is a public utility in the state of Oregon and its rates, service and accounting practices are subject to the regulation of the Commission.

¹ PGE filed its 2022 Wildfire Mitigation Plan on December 30, 2021, in Docket UM 2208. This is the “wildfire protection plan” required by SB 762. PGE uses these terms interchangeably.

2. This Application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items for later incorporation into rates.
3. Written communications regarding this Application should be addressed to:

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

Jaki Ferchland, Manager Revenue Requirement
E-mail: jacquelyn.ferchland@pgn.com

I. Deferral History

In 2019, PGE filed its initial application for the deferral of costs related to wildfire mitigation measures. The initial application sought to defer for later ratemaking treatment the incremental operating and maintenance (O&M) costs associated with wildfire risk mitigation measures. PGE's initial application indicated that while the development and implementation of a comprehensive wildfire mitigation plan is a multi-year effort, immediate steps could be taken to reduce wildfire risks. PGE filed an application to reauthorize the deferral from July 1, 2020 through June 30, 2021. Then, the 2021 Deferral Application was filed seeking to reauthorize the deferral for the July 1, 2021 through June 30, 2022 period. All three previously filed applications in this docket are awaiting Commission action.

Since PGE first filed its deferral application in 2019, several significant events have occurred. First, the Oregon state legislature passed SB 762, which became effective on July 19, 2021. SB 762 directs utilities to develop and implement risk-based wildfire protection plans, to be filed with and evaluated by the Commission.² SB 762 also directs that “[a]ll reasonable operating costs incurred by, and prudent investment made by, a public utility to develop, implement or operate a wildfire protection plan...are recoverable in the rates of the public utility” and that the Commission “shall establish an automatic adjustment clause, as defined in ORS 757.210, or another method to allow timely recovery of the costs.”³

Consistent with the requirements of SB 762, PGE then filed its first Wildfire Mitigation Plan in December 2021. That Wildfire Mitigation Plan for calendar year 2022 was approved by the Commission in Order 22-132. In the first half of 2022, PGE’s general rate case in Docket No. UE 394 was an active proceeding. In the general rate case, PGE proposed incorporating the 2022 Wildfire Mitigation Plan costs in the 2021 Deferral Application and submitted a method for recovering those deferred costs. Although the Commission did not approve the cost recovery mechanism, its April 25, 2022 Order No. 22-129 did not reject the deferral request. Instead, the Commission acknowledged PGE’s request to update the pending wildfire mitigation deferral request to include incremental spending for the 2022 Wildfire Mitigation Plan. The Commission directed any request to update the deferral application or reauthorization be filed in this docket.⁴ The Commission also directed PGE to establish a deferral to track any underspending from its planned budgets for the Wildfire Mitigation Plan.

² SB 762, Section 2.

³ SB 762, Section 3(8).

⁴ UM 394, Order No. 22-129, pg. 26.

In light of those events and the guidance from the Commission, PGE seeks Commission authority to update the 2021 Deferral Application to include incremental and decremental costs related to the 2022 Wildfire Mitigation Plan beginning on January 1, 2022 as well as authority to continue deferring incremental and decremental cost related to the 2022 Wildfire Mitigation Plan through December 31, 2022. This will enable PGE to align this deferral with the timeframe of its annual Wildfire Mitigation Plans (calendar year basis). Accordingly, later this year, PGE will file for reauthorization for the period of January 1, 2023 through December 31, 2023, subject to annual renewals thereafter.

II. Update to Application to Deferral Reauthorization Filed on July 1, 2021

The 2021 Deferral Application sought to reauthorize the deferral of costs for wildfire mitigation measures during the July 1, 2021 through June 30, 2022 timeframe. At the time of filing for the 2021 Deferral Application, those costs were estimated to be approximately \$7 million. In Section IV of this Application, PGE provides updated information regarding the forecasted expenses and capital incurred in the development, implementation and operation of PGE's 2022 Wildfire Mitigation Plan beginning January 1, 2022. The forecasted amounts in Section IV replace the estimates provided in the 2021 Deferral Application.

III. Deferral of Underspending in Compliance with Commission Order No. 22-129

In Order No. 22-129, the Commission directed PGE to establish a deferral to track underspending. This UM 2019 deferral will track both incremental and decremental spending (that is, unspent amounts relative to test year forecast) compared to base rates. Section IV provides updated information on PGE's forecasted spending under the 2022 Wildfire Mitigation Plan compared to what is included in base rates. Since 2023 forecasts have yet to be developed, information on any changes in the forecast for the following year (i.e., calendar year 2023) will be

provided with the Company’s deferral reauthorization application for calendar year 2023 later this year.

IV. Forecasted Calendar Year 2022 Expenses and Capital Incurred in the Development, Implementation and Operation of PGE’s 2022 Wildfire Mitigation Plan

This section provides PGE’s forecasted expenses and capital incurred in the development, implementation, and operation of PGE’s 2022 Wildfire Mitigation Plan for calendar year 2022. PGE implemented new rates on May 9, 2022. Prior to May 9, 2022, there were no wildfire risk mitigation expenses or capital included in base rates. Starting May 9, 2022, base rates include the amount of O&M expenses shown in Table 1 and \$6.0 million of capital placed in service by April30, 2022. The development of these amounts occurred in the second quarter of 2021, prior to PGE filing its 2022 General Rate Case in July 2021, all of which occurred prior to the passage of SB 762 and PGE’s development and submittal of its 2022 Wildfire Mitigation Plan.

**Table 1
Wildfire Risk Mitigation O&M Included in Base Rates Effective May 9, 2022 (\$M)**

Activity	Annualized	May 9 – Dec 31, 2022
Wildfire Mitigation Management	6.6	4.3
Advanced Wildfire Risk Reduction (AWRR)	12.8	8.4
Enhanced Vegetation Management (EVM)	4.2	2.7
TOTAL	23.6	15.4

PGE’s 2022 Wildfire Mitigation Plan describes the efforts PGE undertakes to reduce the risk that electric utility infrastructure could cause a fire, while limiting the impacts of specific mitigation activities, such as Public Safety Power Shutoff (PSPS) events, on customers. PGE’s Wildfire Mitigation Plan discusses PGE’s wildfire risk mitigation assessment, including designation of High Risk Fire Zones (HRFZ), operating protocols, asset management and

inspections, vegetation management (including the advanced wildfire risk reduction (AWRR) program and Enhanced Vegetation Management (EVM) techniques), community outreach and public awareness, PSPS events, and research and development. As the 2022 Wildfire Mitigation Plan makes clear, wildfire-related planning and research are a year-round endeavor and PGE will continually adapt and evolve its practices and actions to mitigate wildfire risk.

Based on the 2022 Wildfire Mitigation Plan and related requirements under SB 762, PGE has updated its forecasted expenses and capital to be incurred in the development, implementation, and operation of the 2022 Wildfire Mitigation Plan, plus additional work that has been identified subsequent to the submission of the 2022 Wildfire Mitigation Plan to the Commission in late December 2021.

A. Updated Forecast of 2022 O&M Expenses

Table 2 shows PGE’s updated total forecast of O&M expenses for calendar year 2022. The amount of 2022 incremental O&M costs to be included in this deferral is shown in the last row of Table 2.

**Table 2
Updated Forecast of 2022 Wildfire Risk Mitigation O&M Expenses (\$M)**

Activity	Jan 1 – May 8, 2022	May 9 – Dec 31, 2022	Total
Wildfire Mitigation in Burn Scar Zones	12.1	5.8	17.9
Wildfire Mitigation – Non-Vegetation Management Activity	1.9	4.3	6.2
Advanced Wildfire Risk Reduction (AWRR)	5.8	15.7	21.5
Total 2022 O&M Forecast	19.8	25.8	45.6
Total amount included in base rates	0.0	15.4	15.4
Total Incremental O&M Expenses Forecasted for Deferral in 2022	19.8	10.4	30.2

The “burn scar zones” are areas that were damaged by previous wildfires, most specifically the 2020 Labor Day wildfire. While significant work has been performed to clear burned trees from these areas already as a part of PGE’s 2020 Labor Day Wildfire Emergency deferral (Docket No. UM 2115), there is additional work to be performed to prevent the risk of future fires in these areas. Immediately following the wildfires, PGE crews identified and removed dead or damaged trees that were at risk of falling onto PGE equipment and causing a fire hazard. At the time, there were trees that appeared green and healthy and were not removed. However, a number of those trees were impacted by the wildfires and now pose wildfire ignition hazards that need to be mitigated. It is imperative to clear these areas to mitigate the risk of future wildfires. As a result, and given the time that has passed since the 2020 Labor Day wildfires, PGE believes these efforts are more appropriately considered wildfire mitigation, and the associated costs are included within this deferral reauthorization.

The Advanced Wildfire Risk Reduction (AWRR) program focuses on HRFZ areas and performs annual inspections of all overhead line mileage within HRFZ areas, optimizes vegetation management strategies based upon inspection results, implements Enhanced Vegetation Management (EVM) techniques, performs quality assurance and quality control of vegetation management inspection and mitigation work completed by crews, documents its vegetation management activities and coordinates vegetation management activities with counties, municipalities and external agencies.

Non-vegetation wildfire mitigation costs include staffing, wildfire training, Community Resource Center costs, and outreach and education.

B. Updated Forecast of 2022 Capital Expenditures

Prior to the May 9, 2022 rate effective date, \$6.0 million of wildfire-related capital was placed in service. For the balance of calendar year 2022, PGE forecasts \$9.6 million of additional capital to be placed in service. These capital investments include installation of weather monitoring stations, air quality monitors, artificial intelligence high-definition cameras, and vipers/reclosers in HRFZs, and replacing copper conductor with aluminum conductor steel-reinforced cable.

V. OAR 860-027-0300(3) Requirements

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

A. Description of Utility Expense for Which the Deferred Accounting is Requested.

See Deferral History above. PGE seeks reauthorization to continue to defer costs associated with PGE's wildfire risk mitigation activities as described above. Without reauthorization this deferral will expire on June 30, 2022. PGE seeks to defer the incremental and decremental costs, compared to what is included in base rates, for calendar year 2022. Later this year, PGE will file for reauthorization for January 1, 2023 to December 31, 2023 in order to align this deferral period with the timeframe of its Wildfire Mitigation Plans (that is, on a calendar-year basis).

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e), and for the reasons discussed above, PGE seeks deferred accounting treatment for incremental wildfire risk mitigation costs. The granting of this Application will minimize the frequency of rate changes and/or match appropriately the costs borne by and benefits received by customers. PGE is separately seeking application of an automatic adjustment clause.

C. Proposed Accounting for Recording Amounts Deferred.

If the deferred amount is a credit (refund), PGE proposes to record it as a regulatory liability in FERC account, 254 Other Regulatory Liability, with a debit to FERC account 407.3 Regulatory Debits. If the deferred amount is a debit (collection), PGE proposes to record it as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets) and credit the appropriate FERC expense accounts. When specific identification of the particular source of the regulatory asset cannot be reasonably made, then FERC account 407.4 (Regulatory Credits) will be credited. In the absence of a deferred accounting order, the costs would be debited to the appropriate cost accounts.

D. Estimate of Amounts to be Recorded for the Next 12 Months.

PGE estimates that the incremental O&M costs for the twelve months of January 1, 2022 through December 31, 2022, related to wildfire risk mitigation to be approximately \$30.2 million, as shown in Table 2 above. For May 9, 2022 through December 31, 2022, PGE forecasts \$9.6 million of additional capital to be placed in service.

E. Notice

A copy of the Notice of Application for deferred accounting treatment and a list of persons served with Notice are attached to the application as Exhibit A. In compliance with the provisions of 860-027-0300(6), PGE is serving notice of application on the service lists of Docket No. UE 394 and UM 2019.

VI. Summary of Filing Conditions

A. Earnings Review

Recovery of incremental wildfire risk mitigation costs will be subject to an earnings review in accordance with ORS 757.259(5) until such time an automatic adjustment clause is approved

by the Commission, in which case cost recovery associated with this deferral will not be subject to an earnings review since it would be subject to an automatic adjustment clause.

B. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of this deferral's annual reauthorization filings or, upon approval of an automatic adjustment clause application to update the relevant schedule.

C. Sharing

All prudently incurred cost and benefits will be collected from or refunded to customers with no sharing mechanism.

D. Rate Spread/Rate Design

The rate spread/rate design will be consistent with the prevailing rate spread/rate design at the time of the amortization.

E. Three percent test (ORS 757.259(6))

The amortization of the deferred costs will be subject to the three percent test in accordance with ORS 757.259(6), which absent certain exceptions limits aggregated deferral amortizations during a year to no more than three percent of the utility's gross revenues for the preceding year.

VII. Conclusion

For the reasons stated above, PGE requests permission to update its 2021 Deferral Application and the authority to continue deferring incremental and decremental, compared to base rates, expenses and capital related to wildfire risk mitigation for calendar year 2022.

DATED this June 30, 2022.

Respectfully Submitted,

/s/ Jaki Ferchland

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Exhibit A

Notice of Application to Reauthorize Deferred Accounting of Costs Associated Wildfire Risk Mitigation Measures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2019

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY

Deferral of Costs Related to Wildfire Risk
Mitigation Measures

**Application to (1) Update Prior
Reauthorization Request and (2)
Reauthorize Deferred Accounting of Costs
Associated with Wildfire Risk Mitigation
Measures**

On June 30, 2022, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission or OPUC) updating a prior reauthorization application and seeking an order reauthorizing deferral of costs associated with wildfire risk mitigation.

Approval of PGE's application will not authorize a change in rates.

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 30, 2022.

Dated June 30, 2022.

/s/ Jaki Ferchland

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application to Update Prior Reauthorization Request and to Reauthorize Deferred Accounting of Costs Associated Wildfire Risk Mitigation** to be served by electronic mail to those parties whose email addresses appear on the attached service lists for OPUC Docket No. UE 394 and UM 2019.

Dated at Portland, Oregon, this 30th day of June 2022.

/s/ Jaki Ferchland

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