

PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: June 2, 2020

REGULAR  CONSENT  EFFECTIVE DATE June 3, 2020

DATE: May 21, 2020

TO: Public Utility Commission

FROM: Scott Gibbens

THROUGH: Bryan Conway, Michael Dougherty, and John Crider **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:  
(Docket No. ADV 1115/Advice No. 20-11)  
Schedule 689 New Load Direct Access (NLDA) Housekeeping Filing.

**STAFF RECOMMENDATION:**

Staff recommends that the Commission approve Portland General Electric's (PGE) housekeeping changes to Schedule 689, NLDA.

**DISCUSSION:**

Issue

Whether the Commission should approve Advice No. 20-11 and allow PGE's suggested revisions to Schedule 689 to go into effect on June 3, 2020.

Applicable Rule

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable. See ORS 757.210. ORS 757.325 prohibits unjust discrimination, and ORS 757.310(2) prohibits a public utility from charging a customer a rate or an amount for service that is "different from the rate or amount the public utility charges any other customer for a like and contemporaneous service under substantially similar circumstances."

Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules. Filings that propose any change in rates, tolls,

charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. See ORS 757.220; OAR 860-022-0015.

ORS 757.600 to 757.689 authorize and regulate the provision of the “direct access” (Direct Access) option in Oregon. The Commission’s rules implementing these statutes are set forth in OAR Chapter 860, Division 038.

### Analysis

#### *Background*

Commission Order No. 20-002 (Order) approved in part PGE’s proposed NLDA tariff, filed as Advice No. 19-02. On March 20, 2020, PGE filed Advice No. 20-06, proposing amendments to Rule C regarding emergency curtailment and updating the Short-Term Emergency Curtailment Plan. In addition, Advice No. 20-06 proposed applicable updates to Schedule 689, New Large Load Cost-of-Service Opt-Out, as well as a few housekeeping changes to the schedules. At the April 21, 2020, Public Meeting, the Commission denied PGE’s requested changes to Rule C and the associated Schedule 689 Special Condition tariff changes. The Commission directed PGE to refile the Schedule 689 housekeeping tariff items separately. The purpose of this filing is to comply with the Commission’s direction following the April 21, 2020, Public Meeting.

#### *Advice No. 20-11 Changes*

PGE proposes the following changes as a part of Advice No. 20-11:

##### Schedule 689

- Clarification on the calculation of customer load.
- Ten business day deadline to return the NLDA service agreement.
- One grammatical edit.

#### *Analysis*

In reviewing the Company’s application and Commission direction, Staff has no concerns regarding the proposed changes made by PGE. The first change defines the way in which a customer’s load will be calculated for application towards the program cap. This is not a substantive change to the cap calculation, but provides a clearer description of the methodology to provide more transparency. The second change defines a deadline by which the customer must return the NLDA service agreement once tendered by PGE. This change is a reflection of Staff and PGE’s efforts to ensure an expedient and efficient process for a program that has shown higher demand than originally anticipated. Further it is a reasonable deadline set by the Company and not unduly burdensome. The final change is to fix a grammatical error found in the tariff. Staff found no errors in the Company’s filing.

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### Conclusion

The Company's proposed changes are in compliance with the Commission's previous direction and Staff finds all of the changes reasonable. Staff found no errors and had no concerns with the Company's filing. Staff finds that the filed tariff sheets will result in fair, just, and reasonable rates.

### **PROPOSED COMMISSION MOTION:**

Approve PGE's advice No. 20-11, and allow the filed tariff sheets to go into effect on June 3, 2020.

ADV 1115/Advice No. 20-11.