



Oregon

Kate Brown, Governor

Public Utility Commission

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June 2, 2020



BY EMAIL

Portland General Electric Company

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RE: Advice No. 20-11

At the public meeting on June 2, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1115. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

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**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.

SCHEDULE 689 (Continued)

APPLICABLE (Continued)

The expected load for each Customer will always be captured and counted toward the cap limit for the first 60 months of service. Following 60 months of service on Schedule 689, the customer's actual load factor (LF) will be applied to the contracted demand (MW) to calculate a customer's MWA to be captured and counted toward the New Large Load Program cap and the total amount of load under the limit will be adjusted at such time of inquiry, in accordance with actual loads.

(C)
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MONTHLY RATE

The Monthly Rate will be the sum of the following charges at the applicable Delivery Voltage per Service Point (SP)*:

| | Delivery Voltage | | |
|----------------------------------|------------------|----------------|------------------------|
| | <u>Secondary</u> | <u>Primary</u> | <u>Subtransmission</u> |
| <u>Basic Charge</u> | \$3,340.00 | \$1,890.00 | \$3,970.00 |
| <u>Distribution Charges**</u> | | | |
| The sum of the following: | | | |
| per kW of Facility Capacity | | | |
| First 4,000 kW | \$1.53 | \$1.49 | \$1.49 |
| Over 4,000 kW | \$1.22 | \$1.18 | \$1.18 |
| per kW of monthly On-Peak Demand | \$2.61 | \$2.53 | \$1.27 |
| <u>System Usage Charge</u> | | | |
| per kWh | (0.024) ¢ | (0.025) ¢ | (0.025) ¢ |
| <u>Administrative Fee</u> | \$0.00 | \$0.00 | \$0.00 |

* See Schedule 100 for applicable adjustments.

** The Customer's load, as reflected in the opt-out agreement executed between the Customer and PGE, may be higher than that reflected in a minimum load agreement for purposes of calculating the minimum monthly Facility Capacity and monthly Demand for the SP, for any Customer with dedicated substation capacity and/or redundant distribution facilities.

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SCHEDULE 689 (Continued)

The Existing Load Shortage Transition Adjustment for the first 60 months is equal to 75 percent of fixed generation costs plus net variable power cost transition adjustments during the first 60 months after enrollment in this rate schedule. The Existing Load Shortage Transition Adjustment after 60 months of service on this rate schedule is equal to 100 percent of fixed generation costs plus net variable power cost transition adjustments.

The Customer may be exempted from the Existing Load Transition Adjustment if the Customer can demonstrate that the change in load in question is not due to load shifting activity described in OAR 860-038-0740. The Company will provide written notification to the Customer at least 30 days prior to charging the Existing Load Shortage Transition Adjustment. The Customer must demonstrate the change in load by providing a written request for exemption that includes explanation for the change in load and support from available documentation. The Company will approve or deny the request of the Customer within 90 days and will not charge the Existing Load Transition Adjustment within this time period.

ENROLLMENT

The Customer must notify the Company of its intent to enroll in this Schedule and execute an opt out agreement at the earlier of one year prior to the expected energization date of the new meter or upon entering a written and binding service agreement for distribution service with the Company. The date of energization date will be agreed upon between the Customer and the Company within a written and binding agreement for service under this Schedule provided by the Company to the Customer. Upon energization, the customer will begin service on PGE daily market energy option until the Customer's chosen ESS commences service. Customer enrollment may be contingent upon additional agreements between the Company and the Customer, including but not limited to Minimum Load Agreements. The Company will not accept applications for service that exceed the current program cap, or load remaining under the enrolled cap. Customer applications with expectations of load to grow beyond the program cap will require separate application and approval by the Commission. (C)

A customer will have ten (10) business days to sign the NLDA service agreement once tendered by PGE. If a Customer executes an opt out agreement for Direct Access Service under this schedule, acceptance of an Enrollment Direct Access Service Request (DASR) is required by the Company. The Company will notify the ESS when to send the enrollment DASR. Prerequisites and notification requirements are as contained in Rule K. (C)

Applicants that do not meet the conditions above, or that are found in breach of the opt out agreement between the Customer and the Company are not eligible for enrollment/continued enrollment under this rate schedule. If the Customer or the Customer's selected ESS cannot demonstrate creditworthiness, the Customer will not be eligible for service under this Rate Schedule and will be enrolled in an applicable cost-of-service based rate.

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