

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 29, 2021**

REGULAR CONSENT EFFECTIVE DATE July 1, 2021

DATE: June 21, 2021

TO: Public Utility Commission

FROM: Bret Farrell

THROUGH: Bryan Conway, Caroline Moore, and Scott Gibbens **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1271/Advice No. 21-14)
Schedule 38 and Schedule 538 - Revises Large Nonresidential Optional
Time-Of-Day Standard Service Applicability Language.

STAFF RECOMMENDATION:

Staff recommends that the Commission approve Portland General Electric's (PGE or Company) filing updating the applicability language for Schedule 38 and Schedule 538 with an effective date of July 1, 2021.

DISCUSSION:

Issue

Whether the Commission should approve PGE's proposed updates to the Applicability section of Schedule 38 Large Nonresidential Optional Time-Of-Day Standard Service and Schedule 538 Large Nonresidential Optional Time-of-Day Direct Access Service to mirror PGE's Schedule 83 for Large Nonresidential Standard Service.

Applicable Rule or Law

Under ORS 757.205(1):

Every public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules, which shall be open to public inspection, showing all rates, tolls, and charges which it has established and which are in force at the time for

any service performed by it within the state, or for any service in connection therewith or performed by any public utility controlled or operated by it.

The Commission may approve tariff changes if they are deemed fair, just, and reasonable. ORS 757.210.

Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025.

OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

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.

Tariff filings to be effective on less than 30 days following notice of the change may be authorized with a waiver of less than statutory notice pursuant to ORS 757.220 and OAR 860-022-0020.

Analysis

On May 24, 2021, PGE filed Advice No. 21-14 and on May 25, 2021, the Company filed replacement sheets to include the fifteenth revision of sheet 538-1 in addition to sheet 38-1.

In this filing, PGE proposes to update the Applicability section in Schedule 38 Large Nonresidential Optional Time-Of-Day Standard Service and Schedule 538 Large Nonresidential Optional Time-of-Day Direct Access Service to mirror PGE's Schedule 83 for Large Nonresidential Standard Service. The proposed change provides Large Nonresidential Customers continuity between Schedule 38/Schedule 538 and Schedule 83 since they are meant to be applicable to the same customer class.

PGE states in the filing that currently if a Schedule 38 or Schedule 538 customer exceeds 200 kW more than once, they are automatically migrated to Schedule 83, which is not the intent of Schedule 38 or 538.

Under the proposed change, the customer would move to Schedule 85 should they exceed the 200 kW Demand threshold more than six times, rather than being moved to

Schedule 83. This change is only applicable to those customers who qualify for Schedules 38 and 83.

PGE's proposal would change the applicability language for Schedule 38 and Schedule 538 as follows:

Original Language

Schedule 38

This optional schedule is applicable to Large Nonresidential Customers: 1) served at Secondary voltage with a monthly Demand that does not exceed 200 kW more than once in the preceding 13 months; or 2) who were receiving service on Schedule 38 as of December 31, 2015.

Schedule 538

This optional schedule is applicable to Large Nonresidential Customers who have chosen to receive service from an Electricity Service Supplier (ESS), and: 1) served at Secondary voltage with a monthly Demand that does not exceed 200 kW more than once in the preceding 13 months; or 2) who were receiving service on Schedule 38 as of December 31, 2015

Proposed Language

Schedule 38

This optional schedule is applicable to Large Nonresidential Customers: 1) served at Secondary Demand Voltage whose Demand has not exceeded 200 kW more than six times in the preceding 13 months and has not exceeded 4,000 kW more than once in the preceding 13 months, or with seven months or less of service has not had a Demand exceeding 4,000 kW; or 2) who were receiving service on Schedule 38 as of December 31, 2015.

Schedule 538

This optional schedule is applicable to Large Nonresidential Customers who have chosen to receive service from an Electricity Service Supplier (ESS), and: 1) served at Secondary Demand Voltage whose Demand has not exceeded 200 kW more than six times in the preceding 13 months and has not exceeded 4,000 kW more than once in the preceding 13 months, or with seven months or less of service has not had a Demand exceeding 4,000 kW; or 2) who were receiving service on Schedule 38 as of December 31, 2015.

This proposed change does not increase, decrease, or otherwise change existing rates, or impact revenues for PGE.

After reviewing the filing, Staff issued an information request inquiring about the timing and reasoning for the filing.

In their response to the information request, PGE stated that they were unaware that customers were migrating to Schedule 83 because of the difference in maximum demand applicability until recently. Upon discovering this issue, PGE planned to file this advice filing to align Schedule 38 and Schedule 538 with Schedule 83.

Conclusion

Based on Staff's analysis, Staff recommends that the Commission allow the advice filing to go into effect to update the Applicability section for Schedule 38 Large Nonresidential Optional Time-Of-Day Standard Service and Schedule 538 Large Nonresidential Optional Time-of-Day Direct Access Service to mirror PGE's Schedule 83 for Large Nonresidential Standard Service.

PROPOSED COMMISSION MOTION:

Approve PGE's revised Schedule 38 Large Nonresidential Optional Time-Of-Day Standard Service and Schedule 538 Large Nonresidential Optional Time-of-Day Direct Access Service and proposed modifications as described in Advice No. 21-14, effective with service on and after July 1, 2021.