



**Portland General Electric Company**  
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March 1, 2022

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

Re: **UM \_\_\_\_\_ PGE's Application for Deferral of Costs Associated with the Flexible Load Demand Response Pilots**

Filing Center:

Pursuant to ORS 757.259, OAR 860-027-0030 and Commission Order No. 22-023 , Portland General Electric Company (PGE) hereby requests authorization to defer certain costs associated with certain PGE's Flexible Load Demand Response Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UE 394 service list.

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](mailto:pge.opuc.filings@pgn.com).

Sincerely,

*/s/ Jaki Ferchland*

Jaki Ferchland  
Manager, Revenue Requirement

JF/np  
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM \_\_\_\_\_

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

PGE Deferral of Costs Associated with the  
Flexible Load Demand Response Pilots

**Application for Deferred Accounting for  
Costs Associated with the Flexible Load  
Demand Response Pilots**

Pursuant to ORS 757.259, OAR 860-027-0300, and Public Utility Commission of Oregon (Commission or OPUC) Order No. 22-023, Portland General Electric Company (PGE) hereby submits this Application to request authorization to defer operations and maintenance (O&M) costs associated with certain PGE Flexible Load Demand Response Pilots, which are amortized through Schedule 135. In Docket No. UM 2141, PGE proposed a Flexible Load Plan to provide holistic and transparent planning, budgeting, and reporting of pilots related to flexible load and demand response pilots. PGE requests this application be effective from March 1, 2022, through December 31, 2022. Thereafter, PGE will submit annual reauthorizations to align all demand response budgets with the multi-plan year plan on which the flexible load budgets will be based. PGE will submit updates to the multi-year plan in August each year for Commission approval of the plan for the following calendar year.

Commission Order No. 22-023 adopted OPUC Staff’s recommendation that “PGE consolidate the budgets for these four pilots [Peak Time Rebate, Time-of-Day, Residential Smart Thermostat, and Energy Partner Demand Response] and the Testbed Phase II into a single, new deferral authorization request for the flexible load portfolio.”<sup>1</sup> As a result, this application

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<sup>1</sup> Commission Order No. 22-023, Appendix A, Page 16.

combines five demand response pilots: Nonresidential Demand Response Pilot (PGE Schedule 26), Residential Direct Load Control Pilot (PGE Schedule 5), Peak Time Rebate and Time-of-Use (PGE Schedule 7), and Residential Testbed Pilot (PGE Schedule 13). The initial applications for these pilots were submitted as part of Docket Nos. UM 1514, UM 1708, and UM 1976. We request this deferral to be effective from the date of this filing until December 31, 2022. Additionally, we request that this Application be subject to the automatic adjustment clause. In support of this application PGE states:

1. PGE is a public utility in the state of Oregon and its rates, service and accounting practices are subject to regulation by the Commission.
2. This application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items.
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
Email	jacquelyn.ferchland@pgn.com

## **I. OAR 860-027-0300(3) Requirements**

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

### **A. Background Description**

In alignment with the policies and requirements of the State of Oregon and Commission, PGE developed several demand response pilots to help address decarbonization goals, assist customers in managing their energy consumption and total energy costs, and enhance operational performance and efficiency. PGE's demand response pilots comply with Oregon's policy directives and support PGE's decarbonization and performance imperatives.

*Nonresidential Demand Response Program (PGE Schedule 26)*

PGE first filed for this deferral via Docket No. UM 1514 on December 29, 2010, first received approval for this pilot via OPUC Order No. 11-182, and has filed reauthorization requests and received approvals for the pilot annually thereafter.

The Nonresidential Demand Response Program is designed to reduce peak demand requirements during specific time windows in the winter and summer seasons by incenting customers to reduce their energy consumption during those times. PGE expects the primary source of this reduced demand (load) will be from large nonresidential customers, with an option for small and medium nonresidential customers to participate as well. This program provides capacity; and it may evolve to provide intra-hour grid services to support reliability and renewables integration. As of January 2022, the program has built 26.8 MW of summer capacity and 21.9 MW of winter capacity.

*Residential Direct Load Control Thermostat (DLCT) Pilot (PGE Schedule 5)*

PGE first filed for this deferral via Docket No. UM 1708 on October 3, 2014, first received approval for this pilot via OPUC Order No. 15-203, and has filed reauthorization requests and received approvals for the pilot annually thereafter.

The DLCT Pilot aims to enroll and operate connected residential thermostats to control electric heating and cooling load. This pilot provides firm capacity; to participate in the pilot,

PGE residential customers must operate either a ducted heat pump, electric forced-air furnace, or central air conditioner. As of January 2022, the pilot has built 28 MW of summer capacity and 9 MW of winter capacity.

*Flex 2.0 – Peak Time Rebate (PTR) and Time-of-Use (TOU)(PGE Schedule 7)*

PGE first filed for this deferral via Docket No. UM 1708 on October 3, 2014 received approval via OPUC Order No. 15-203, and has filed reauthorization requests and received approvals

The Flex 2.0 Residential Pricing Pilot consists of two offerings: Peak Time Rebates and a new TOU rate. Both provide energy use optimization by shifting use out of high demand periods to provide peak reduction.

PTR: The vast majority of PGE’s residential customer base is eligible to participate in PTR, and enrollment increased by approximately 34,000 residential customers by the end of 2021. The PTR pilot provides educational energy saving tips and rewards customers for shifting their energy use during typically 3-4 hour “event” periods when energy demand or prices are high. This helps PGE use more sustainable energy resources, lower costs, and provide customers with reliable energy. costs are higher and renewable energy sources are less plentiful. Customers are notified one day prior to the event via text and/or e-mail, based on their preference, and encouraged to shift usage during the event hours the next day. They also typically receive a same-day event reminder. After the event, they are notified of the result of their specific effort and, if applicable, their earned incentive. Customers earn \$1.00 for every kWh they shift during an event, and the rebate appears as a credit on their next monthly bill. There is no “penalty” should a customer use more than expected energy during an event, making PTR a no-risk, “win-only” offering for our customers.

In 2021, the load shift impact ranged between 10 MW to 17 MW. Slightly more than half of our residential customers earned rebates during each event; the average value of each rebate was approximately \$2 to \$3 per event.

TOU: Time of Use (also referred to as Time of Day) is a rate designed with a focus on encouraging behavioral change and associated load impact. More than 1,600 customers have enrolled in the program since its introduction May 1, 2021, and PGE expects that number to increase to 17,000 by EOY 2022 pending introduction of an online rate calculation tool (an essential tool in the customer's decision-making process) and increased enrollment outreach.

Time of Day is a critical component in the company's overall product engagement and DER strategy. As such it is the "glue" that can bind multiple products and services together (Smart Thermostat, EV Charging pilot, and Peak Time Rebates) in a way that delivers a curated experience for a customer based on known preferences, needs, and eligibility. Enabling a clear customer journey that paves the pathway toward product bundling of this nature will drive customer satisfaction, engagement, and retention while supporting PGE's strategic objectives.

*Smart Grid Testbed (SGTB or Testbed) Pilot Phase II (PGE Schedule 13)*

PGE first filed for this deferral via Docket No. UM 1976 on November 5, 2018, first received approval for this pilot via OPUC Order No. 19-425, and has filed reauthorization and received approvals for the pilot annually thereafter.

The SGTB Pilot selected three neighborhoods in relation to three substations (Roseway, Delaware, and Island) in three cities (Portland, Milwaukie, and Hillsboro, respectively), collectively representing approximately 20,000 PGE customers. These substations and the customers taking service from them collectively create a representative subset of PGE's customers across the residential, commercial, and industrial customer types. Customers in these

neighborhoods participate in a range of pilots and demonstrations with some of the pilot enrollments on an opt-out basis. The Testbed team coordinated related demand response customer offerings within the Testbed pilot area, such as pilots for customer energy storage, electric vehicle charging, and where possible, with the Energy Trust's energy efficiency products. The coordination of all these DR offerings with the Testbed is expected to provide insights into interactive effects of running several different pilots within the same customer premises or system geography. Also, the Testbed is expected to provide insights into coordinated demand response product and program offerings as PGE aligns our DR activity with the Energy Trust and the Northwest Energy Efficiency Alliance to take advantage of benefits around co-messaging, sharing delivery channels, and incentives.

B. Reasons for Deferral

Pursuant to ORS 757.259(2)(e) and for the reasons discussed above, PGE seeks deferred accounting treatment for costs associated with the Flexible Load Demand Response Pilots. The approval of this Application will support the use of an automatic adjustment clause and associated balancing account so that the referenced costs can be kept distinct and separate from PGE's other costs. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers.

C. Proposed Accounting for Recording Amounts Deferred

PGE proposes to record the deferral 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 the total incremental Flexible Load Demand Response Pilots amount to defer in the next twelve months to be approximately \$8.2 million as listed in Table 1 below.

**Table 1**  
**Approximate annual expenses (000's)**

	2021 Actuals	2022 Forecast	2-year Total
Schedule 26	\$3,014	\$2,368	<b>\$5,382</b>
TOU	\$164	\$835	<b>\$999</b>
PTR	\$993	\$955	<b>\$1,948</b>
DLCT	\$2,485	\$2,834	<b>\$5,319</b>
SGTB – Phase II	\$-	\$1,197	<b>\$1,197</b>
	<b>\$6,657</b>	<b>\$8,188</b>	<b>\$14,845</b>

E. Notice

A copy of the Notice of Application for Deferral of Costs Associated with the Flexible Load Demand Response Pilots and a list of persons served with Notice are attached to this Application as Attachment A. In compliance with OAR 860-027-0300(6), PGE is serving Notice of Application on the service lists for UM 1514, UM 1708, UM 1976, and UE 394, PGE's current general rate case.

**II. Summary of Filing Conditions**

A. Earnings Review

Cost recovery associated with this deferral will not be subject to an earnings review because 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 PGE's deferral or amortization filings.



C. Sharing

No sharing mechanism applies to the Flexible Load Demand Response Pilot costs.

D. Rate Spread/Rate Design

The rate spread/rate design will be performed in accordance with PGE Schedule 135.

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

The amortization of the Flexible Load Demand Response Pilots' deferred costs will be subject to the three percent test in accordance with ORS 757.259 (7) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

**III. Conclusion**

For the reasons stated above, PGE requests approval to defer the costs associated with the Flexible Load Demand Response Pilots effective March 1, 2022.

DATED this 1<sup>st</sup> day of March 2022.

*/s/ Jaki Ferchland*

Jaki Ferchland  
Manager, Revenue Requirement  
Portland General Electric Company  
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## **Attachment A**

### **Notice of Application for Deferral of Costs Associated with the Flexible Load Demand Response Pilots**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM \_\_\_\_\_**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

PGE Deferral of Costs Associated with the  
Flexible Load Demand Response Pilots

**Application for Deferred Accounting for  
Costs Associated with Flexible Load  
Demand Response Pilots**

On March 1, 2022, Portland General Electric Company (PGE) filed an Application with the Public Utility Commission of Oregon (the Commission or OPUC) for an Order authorizing deferral of costs associated with the Flexible Load Demand Response Pilots.

Approval of PGE’s Application as proposed will support the use of an automatic adjustment clause rate schedule and balancing account to reflect the incremental costs associated with the Flexible Load Demand Response Pilots.

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 April 1, 2022.

Dated this 1<sup>st</sup> day of March 2022.

*/s/ Jaki Ferchland*  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application for the Deferral of Costs Associated with the Flexible Load Demand Response Pilots** to be served by electronic mail to those parties on the attached service list for OPUC Docket No. UE 394, and to the service lists for Dockets UM 1514, UM 1708, and UM 1976.

Dated at Portland, Oregon, this 1<sup>st</sup> day of March 2022.

*/s/ Jaki Ferchland*

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