



**Portland General Electric**  
121 SW Salmon Street • Portland, OR 97204  
portlandgeneral.com

January 31, 2024

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street, S.E.  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: Advice No. 24-03, Schedule 25 Nonresidential Direct Load Control Pilot Update**

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rule (OAR) 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 19, with a requested effective date of **March 20, 2024**:

- First Revision of Sheet No. 25-1
- First Revision of Sheet No. 25-2
- First Revision of Sheet No. 25-3
- First Revision of Sheet No. 25-4
- Original Sheet No. 25-5

The purpose of this filing is to update the Schedule 25 Nonresidential Direct Load Control pilot to add a Bring Your Own Thermostat (BYOT) option to the tariff, allowing commercial customers to participate in the pilot with their own pre-existing, qualified thermostat. This tariff change also removes the restriction of calling events on weekends to align this tariff with the other demand response options.

The BYOT option allows for increased participation through an expanded list of qualified internet-connected smart thermostats that customers may have already installed at their business or that came with the space. Further, this lowers the barrier to entry and allows for more participants in the Direct Load Control Pilot.

To satisfy the requirements of OAR 860-022-0025, PGE responds as follows:

This change does not increase, decrease, otherwise change existing rates, or impact revenues. The enrollment incentives and event season participation incentives are recovered through Schedule 135.

A redline version of Schedule 25 is also included as a courtesy.

PGE Advice No. 24-03  
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Please direct any questions regarding this filing to Casey Manley at [casey.manley@pgn.com](mailto:casey.manley@pgn.com) Please direct all formal correspondence and requests to the following email address [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing & Tariffs

Enclosures

PGE Advice No. 24-03  
Courtesy redline version of Schedule 25

## SCHEDULE 25 NONRESIDENTIAL DIRECT LOAD CONTROL PILOT

### PURPOSE

This Direct Load Control Pilot is a demand response option for eligible nonresidential Customers. The Direct Load Control Pilot offers incentives to allow the Company to control thermostats during Direct Load Control Events while providing a customer override. The Company provides advance notice to participating Nonresidential Customers for Direct Load Control Events. The Pilot is expected to be conducted from December 1, 2017 through May 31, 2025.

### DEFINITIONS

Central Air Conditioning – Air conditioner tied into a central ducted forced air system.

~~Direct Installation – Thermostat delivery model in which a PGE technician, or implementation contractor technician representing PGE, installs thermostat(s) at a qualifying customer Site at a reduced cost to the Customer and enables the thermostat(s) to participate in the Pilot.~~

Direct Load Control – A remotely controllable switch that allows the utility to operate an appliance, often by cycling. In terms of this pilot, direct load control allows the Company to change the set point or cycle the Nonresidential Customer's heating or cooling through the Customer's Qualified Thermostat in order to reduce the Customer's energy demand.

Direct Load Control Event – A period of time in which the Company will provide direct load control.

Ducted Heat Pump – Heat pump heating and cooling system hooked into a central ducted forced air system.

Electric Forced Air Heating – An electrical resistance heating system tied into a central ducted forced air system.

Event Notification – The Company will issue a notification of a Direct Load Control Event to participating Customers. Participating Nonresidential Customers must choose at least one method for receipt of notification. Notification methods may include email, text, auto-dialer phone call, on thermostat display screen, or via mobile app notification. Notification may also be available on the Company's website.

Event Season – The pilot has two event seasons: the Summer Event Season and the Winter Event Season.

Holidays – The following are holidays for purposes of the pilot: New Year's Day (January 1), Martin Luther King Day (third Monday in January), President's Day (third Monday in February), Independence Day (July 4), Labor Day (first Monday in September), Thanksgiving Day (fourth Thursday in November), and Christmas Day (December 25). If a holiday falls on a Saturday, the preceding Friday will be designated the holiday. If a holiday falls on a Sunday, the following Monday will be designated the holiday.

## SCHEDULE 25 (Continued)

### DEFINITIONS (Continued)

Non-Ducted HVAC System Thermostat Demonstration – A demonstration within the smart grid test bed that meets Special Conditions 8 through 10. Demonstrations are limited in scope and will not interfere with the operations of the Nonresidential DLC Pilot.

~~Summer Event Season – Includes the successive calendar months June through September.~~

~~Winter Event Season – Includes the successive calendar months November through February.~~

Qualified Site – Nonresidential Customer building served under qualifying PGE rate Schedule (as defined in Applicable section below) with a unique PGE service address and utility meter. Additionally, Qualified Sites meet HVAC system requirements defined in Eligibility section below.

Qualified Thermostat – Thermostats that are Company-approved have been integrated with Company's demand response management system for event calling.

~~Summer Event Season – Includes the successive calendar months June through September.~~

~~Winter Event Season – Includes the successive calendar months November through February.~~

### AVAILABLE

In all territory served by the Company.

### APPLICABLE

To qualifying Nonresidential Customers served under Schedules 32, 38, 47, 49, 75, 83, 85, 89, and 90. The Company will limit participation to 7,000 Qualified Thermostats. Nonresidential Customers will remain on their base schedule and will be eligible for the incentives described in this schedule.

### ELIGIBILITY

Eligible Nonresidential Customers must have a Network Meter. Nonresidential Customers must have a Qualified Thermostat connected to the internet and the heating or cooling system at their expense, except as provided in the Incentives section of this schedule. To participate in the Winter Event Season, the Nonresidential Customer must have a Ducted Heat Pump or Electric Forced Air Heating. To participate in the Summer Event Season, the Nonresidential Customer must have Central Air Conditioning or a Ducted Heat Pump.

## SCHEDULE 25 (Continued)

### DIRECT LOAD CONTROL EVENT

Direct Load Control Events occur for one to five hours. The Company may call two events per day but will not exceed five cumulative hours for the day. During Direct Load Control Events the Customer may allow the Company to control their thermostat for the duration of the event. The Customer has the option not to participate by overriding the temperature setpoint via the thermostat. The Company initiates Direct Load Control Events with Event Notification. The Company will call Direct Load Control Events only during the Event Seasons. Direct Load Control Events will not be called on ~~weekends or~~ Holidays. Reasons for calling events may include but are not limited to: energy load forecasted to be in the top 1% of annual load hours, forecasted temperature above 90 or below 32, expected high generation heat rates and market power prices, and/or forecasted low or transitioning wind generation. The Company will call no more than 150 event hours per Event Season.

### ENROLLMENT

The Customer may enroll at any time but must participate for the minimum number of hours described in the incentive section.

### INCENTIVES

#### BRING YOUR OWN THERMOSTAT

This delivery channel allows the Customer to use their Qualified Thermostat, which must be connected to the internet and the electric heating or cooling system, at the Customers' expense, to participate in Direct Load Control Events and receive incentives. One-time Incentives of up to \$200 per thermostat may be issued for signing up for this delivery channel. Customers receive up to \$60 per Qualified Site for each Event Season they participate. A Customer participating in all Event Seasons receives up to \$120 per Qualified Site per Pilot year. To receive payment for an Event Season, all Qualifying Thermostats at the Qualified Site must participate in at least 50% of the event hours for which the Customer is eligible to participate in that Event Season.

#### DIRECT INSTALLATION

Participating Customers receive a Qualified Thermostat for signing up for the Direct Load Control Pilot's Direct Installation channel. A Customer may receive multiple Qualified Thermostats for separate spaces subject to verification by the Company. A Customer co-pay of up to \$60 per installed thermostat is required for participation. Customers receive up to \$60 per Qualified Site for each Event Season they participate. A Customer participating in all Event Seasons receives up to \$120 per Qualified Site per Pilot year. Incentives are paid to the Customer with an automated clearing house (ACH,) check, bill credit, or generic gift card. To receive payment for an Event Season, all Qualifying Thermostats at the Qualified Site must participate in at least 50% of the event hours for which the Customer is eligible to participate in that Event Season.

**SCHEDULE 25 (Continued)**

**SPECIAL CONDITIONS (Continued)**

- ~~1. Customers that reenroll in the program are not eligible for additional Qualified Thermostats for signing up. A Customer continuing service at a new location is not considered a new enrollment.~~
- ~~2. If the participating Customer moves to a different location, the Customer may continue participation if the new location meets the eligibility requirements.~~
- 3.1. The Company will defer and seek recovery of all pilot costs not otherwise included in rates.
- 4.2. The Company is not responsible for any direct, consequential, incidental, punitive, exemplary, or indirect damages to the participating Customer or third parties that result from Air Conditioning Cycling, ~~or~~ changing the thermostat set point, or the functionality of the device.
- ~~5.3.~~ The Company shall have the right to select the cycling schedule and the percentage of the Customer's heating or cooling systems to cycle at any one time, up to 100%, at its sole discretion.
- ~~6.4.~~ The Company shall have the right to pre-heat or pre-cool the Site as part of the Direct Load Control event in order to thermally condition the space to increase occupant comfort and site performance for the duration of the event.
- ~~7.5.~~ The provisions of this schedule do not apply for any period that the Company interrupts the Customer's load for a system emergency or any other time that a Customer's service is interrupted by events outside the control of the Company. The provisions of this schedule will not affect the calculation or rate of the regular service schedule and associated charges and Customers will not be charged for energy not used or demand not set during Direct Load Control Events.
- ~~8.6.~~ The Company may engage with Customers who have existing qualified thermostats installed at their Sites to enroll them in the pilot. Customers with pre-existing thermostats that were not installed through the Direct Installation channel are eligible for seasonal incentives.
- 9.7. PGE has the right to remove a Customer from the pilot when good cause is shown including, but not limited to, poor customer responsiveness, consistent customer non-participation in called events, or issues with customer equipment that impact customer's participation.

**SCHEDULE 25 (Concluded)**

SPECIAL CONDITIONS (Continued)

PERTAINING TO BRING YOUR OWN THERMOSTAT

1. Customers that reenroll in the program are not eligible for a second payment for signing up. A Customer continuing service at a new location is not considered a new enrollment.
2. If the participating Customer relocates to a different location, they may continue their participation in the program, provided that the new location meets the eligibility requirements.

PERTAINING TO DIRECT INSTALLATION

1. Customers that reenroll in the program are not eligible for additional Qualified Thermostats for signing up.
2. If the participating Customer relocates to a different location, they may continue their participation in the program, provided that the new location meets the eligibility requirements.

**TERM**

This pilot term is December 1, 2017 through May 31, 2025.



**SCHEDULE 25  
NONRESIDENTIAL DIRECT LOAD CONTROL PILOT**

**PURPOSE**

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## SCHEDULE 25 (Continued)

### DEFINITIONS (Continued)

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Qualified Thermostat – Thermostats that are Company-approved have been integrated with Company's demand response management system for event calling.

Summer Event Season – Includes the successive calendar months June through September. (M)

Winter Event Season – Includes the successive calendar months November through February. (M)

### AVAILABLE

In all territory served by the Company.

### APPLICABLE

To qualifying Nonresidential Customers served under Schedules 32, 38, 47, 49, 75, 83, 85, 89, and 90. The Company will limit participation to 7,000 Qualified Thermostats. Nonresidential Customers will remain on their base schedule and will be eligible for the incentives described in this schedule.

### ELIGIBILITY

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## SCHEDULE 25 (Continued)

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Direct Load Control Events occur for one to five hours. The Company may call two events per day but will not exceed five cumulative hours for the day. During Direct Load Control Events the Customer may allow the Company to control their thermostat for the duration of the event. The Customer has the option not to participate by overriding the temperature setpoint via the thermostat. The Company initiates Direct Load Control Events with Event Notification. The Company will call Direct Load Control Events only during the Event Seasons. Direct Load Control Events will not be called on Holidays. Reasons for calling events may include but are not limited to: energy load forecasted to be in the top 1% of annual load hours, forecasted temperature above 90 or below 32, expected high generation heat rates and market power prices, and/or forecasted low or transitioning wind generation. The Company will call no more than 150 event hours per Event Season.

(C)

### ENROLLMENT

The Customer may enroll at any time but must participate for the minimum number of hours described in the incentive section.

### INCENTIVES

(C)

### BRING YOUR OWN THERMOSTAT

(N)

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### DIRECT INSTALLATION

(N)

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**SCHEDULE 25 (Continued)**

**SPECIAL CONDITIONS**

- |  |                |
|--|----------------|
|  | (T)            |
|  | (T)            |
|  | (D)            |
| 1. The Company will defer and seek recovery of all pilot costs not otherwise included in rates.  | (T) (M)        |
| 2. The Company is not responsible for any direct, consequential, incidental, punitive, exemplary, or indirect damages to the participating Customer or third parties that result from Air Conditioning Cycling, changing the thermostat set point, or the functionality of the device.   | (T)<br>(C) (M) |
| 3. The Company shall have the right to select the cycling schedule and the percentage of the Customer's heating or cooling systems to cycle at any one time, up to 100%, at its sole discretion.   | (T)            |
| 4. The Company shall have the right to pre-heat or pre-cool the Site as part of the Direct Load Control event in order to thermally condition the space to increase occupant comfort and site performance for the duration of the event.   | (T)            |
| 5. The provisions of this schedule do not apply for any period that the Company interrupts the Customer's load for a system emergency or any other time that a Customer's service is interrupted by events outside the control of the Company. The provisions of this schedule will not affect the calculation or rate of the regular service schedule and associated charges and Customers will not be charged for energy not used or demand not set during Direct Load Control Events. | (T)            |
| 6. The Company may engage with Customers who have existing qualified thermostats installed at their Sites to enroll them in the pilot. Customers with pre-existing thermostats that were not installed through the Direct Installation channel are eligible for seasonal incentives.   | (T)            |
| 7. PGE has the right to remove a Customer from the pilot when good cause is shown including, but not limited to, poor customer responsiveness, consistent customer non-participation in called events, or issues with customer equipment that impact customer's participation.   | (T)            |
|  | (M)            |

**SCHEDULE 25 (Concluded)**

SPECIAL CONDITIONS (Continued)

PERTAINING TO BRING YOUR OWN THERMOSTAT

1. Customers that reenroll in the program are not eligible for a second payment for signing up. A Customer continuing service at a new location is not considered a new enrollment.
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PERTAINING TO DIRECT INSTALLATION

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2. If the participating Customer relocates to a different location, they may continue their participation in the program, provided that the new location meets the eligibility requirements.

**TERM**

This pilot term is December 1, 2017 through May 31, 2025.

(N)

(N)

(M)

(M)