

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: May 19, 2020**

REGULAR CONSENT EFFECTIVE DATE May 20, 2020

DATE: May 11, 2020

TO: Public Utility Commission

FROM: Anna Kim

THROUGH: Bryan Conway, Michael Dougherty, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 1710)
Request amendment to Order No. 15-200 to modify reporting requirements.

STAFF RECOMMENDATION:

Staff recommends that the Public Utility Commission of Oregon (Commission) modify Order No. 15-200 to adopt updated annual report requirements for Flex Peak Program, as requested by Idaho Power Company (Idaho Power or Company).

DISCUSSION:

Issue

Whether to modify Order No. 15-200 to adopt updates to Idaho Power Company's reporting requirements for the Flex Peak Program.

Applicable Law

Under ORS 756.568, the Commission may at any time, upon notice, rescind, suspend or amend any order.

In Docket No. UM 1710, the Commission issued Order No. 15-200, adopting Staff's proposed motion that:

Idaho Power file its request for cost-effective exceptions for specific DSM measures on an annual basis or, in years where Idaho Power has no need

for such a request, the Company file its annual DSM report electronically in the UM 1710 docket.

Analysis

On March 3, 2015, the Company requested in Advice No. 15-03 to submit Schedule 76 and create the Flex Peak Program, which is a voluntary demand response program for commercial and industrial customers. The Commission authorized this advice filing to take effect. Under this program, the Company operates demand response events each summer from June 15 to August 15.

Staff reviewed this request, and in a memo, Staff recommended that the program be approved, but requested additional reporting. Staff requested an annual Flex Peak Program report with specific metrics be submitted within 90 days of the conclusion of the Program season.¹

Staff specifically requested that the Flex Peak Program report include the following information:

1. Participating Customers;
2. Total number of sites;
3. Number of events called;
4. Total load dropped for each event;
5. Event duration;
6. Total capacity payments made;
7. Total energy payments made;
8. Number of customers who failed to meet their load;
9. Number of program applications denied due to Program subscription limit;
10. Benefits identified with each dispatch of the resource;
11. An assessment of whether the trigger or dispatch price is properly set to utilize the asset most often;
12. Any participant attrition;
13. Any issues the utility has identified meeting requests to participate in the program;
14. Any changes in baseline methodology taken or anticipated; and
15. What improvements Idaho Power and the program might benefit from.²

¹ Staff Report, Idaho Power Company: (Docket No. ADV7/Advice No. 15-03) Requests to create Schedule 76 – Flex Peak Program, April 14, 2015 pg. 9.

² Ibid, pg. 8.

Based on a Commission decision at the April 28, 2015, Public Meeting, Schedule 76 went into effect on May 1, 2015. Despite the absence of a Commission order to provide this documentation, the Company has been voluntarily submitting a report within 90 days of the end of the Program season including all requested information. This report is filed under Docket No. RE 169. Staff appreciates the reporting and additional analysis provided in this report.

Consistent with its reporting commitment reflected in Order No. 15-200, Idaho Power has filed its annual demand-side management (DSM) report in the UM 1710 docket since 2015. This annual report includes reporting on both energy efficiency and demand response programs. The Flex Peak Program report filed in RE 169 is included in its entirety within this report. The DSM report is typically filed in April of each year.³

On April 1, 2020, the Company filed the 2019 Demand-Side Management Annual Report. Enclosed with the report, the Company requested to file the Flex Peak Program report only once a year within UM 1710 and to discontinue the RE 169 report that had been filed within 90 days of the end of the season. This would allow the Company to provide the same information, but have more time to produce the report, and reduce the total number of filings while centralizing all DSM reporting in one document.

Staff finds this request to be reasonable, and supports clarifying that the stand-alone Flex Peak Program report is not required. Staff believes reporting within the DSM Report filed in UM 1710 is sufficient, and the Company should cease filing a separate report in RE 169. Additionally, while the Company is willing to continue all reporting as requested by Staff in the Staff memo concerning ADV 15-03, it does request authorization to cease to report on items 10 and 11:

10. Benefits identified with each dispatch of the resource;
11. An assessment of whether the trigger or dispatch price is properly set to utilize the asset most often.

The Company would like to provide information at an aggregate level across events, which would be more consistent with an Idaho Public Utility Commission settlement on the Company's demand response programs.

Staff believes this request is reasonable, and event-level reporting on these two items is no longer necessary. Rather, Staff recommends that the Company and Staff annually confer on the appropriate reporting details so that transparency is not lost, but all parties

³ Order No. 15-200 pg. 7.

have the flexibility to tailor reporting so that it is relevant. Staff therefore recommends the Commission modify its Order No. 15-200 so that it reads:

Idaho Power is directed to file its request for cost-effective exceptions for specific DSM measures on an annual basis and, regardless of a need for such a request, the Company is directed to file its annual DSM report electronically in the UM 1710 docket, including information on demand response programs.

Conclusion

Based on Staff's analysis of existing reporting by the Company, Staff believes that filing information on the Flex Peak Program once annually within the DSM Report is sufficient and initial submission of the report is not required. Staff recommends modifying Order No. 15-200 as described in the memo.

PROPOSED COMMISSION MOTION:

Adopt Staff's recommendation to modify Order No. 15-200 to update reporting requirements as outlined in this memo.