



Portland General Electric
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April 23, 2019

Via
puc.filingcenter@state.or.us

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, Suite 100
P. O. Box 1088
Salem, OR 97308-1088

**Re: UM 1938 Application for Reauthorization of the Deferral of Costs and Revenues
Associated with Transportation Electrification Pilots**

Pursuant to ORS 757.259, and OAR 860-027-0300, enclosed for filing is the Application of Portland General Electric Company ("PGE") for Reauthorization of the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots. PGE's original deferral application for the period May 7, 2018 through May 6, 2019 is awaiting Commission approval.

A Notice of Application regarding the filing of this application is attached. We have provided notification to the UM 1938 and UE 335 service lists. Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

If you have any questions or require further information, please call me at (503) 464-7805 or Alex Tooman at (503) 464-7623.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stefan Brown", is written over a light blue rectangular background.

Stefan Brown
Manager, Regulatory Affairs

SB:np
Enclosures

cc: UM 1938 and UE 335 Service Lists

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1938

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots)))))))))) Application for Reauthorization of the Deferral of Costs and Revenues Associated with Transportation Electrification Pilots
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Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (“PGE”) hereby respectfully requests authorization to continue to defer the costs and revenues associated with the Transportation Electrification Pilots (“Pilots”) approved by Public Utility Commission of Oregon (“Commission” or “OPUC”) Order No. 18-054 (Docket No. UM 1811). These Pilots are aimed at advancing state policy to accelerate transportation electrification in Oregon. We request this deferral to be effective as of the application filing date.

I. Deferral History.

PGE filed its initial request for the deferral in April 2018. That application also proposed that the deferral support an automatic adjustment clause rate schedule for the Pilots’ 10-year period as described below. PGE is currently awaiting Commission action on its initial application to defer costs associated with the Pilots. Thus, we have an unresolved initial deferral application and are now at the 12-month deadline for that deferral, prompting this “reauthorization” filing.

Based on Commission Order Nos. 18-423 and 19-053 (Docket No. UM 1909) and the opening of an investigation into recovery of capital-related costs (Docket No. UM 2004), PGE recognizes that approval of certain aspects of the initial deferral filing will depend on the final decision in UM 2004. Specifically, these aspects relate to PGE’s request for an automatic adjustment clause and a mechanism for tracking incremental capital that has closed to plant and is

used and useful to serve customers. As a result, work papers to this filing provide detail regarding capital expenditure for informational purposes.

In accordance with Commission Order No. 18-054 and OAR 860-087-0030 that approved the Pilots, PGE is launching three Pilots: Electric Avenue (10 years), TriMet Mass Transit (10 years), and Education and Outreach (3 years) and will incur incremental costs, including cost related to evaluations, for the Pilots. The details of the Pilots are discussed in PGE's supplemental application for transportation electrification programs filed March 15, 2017 (Docket No. UM 1811) and are summarized as follows:

- Electric Avenue Pilot (including procurement, software, engineering studies, outreach, maintenance and payment process expenses);
- Support of Tri-Met Mass Transit (including procurement, management and maintenance expenses);
- Education and Outreach pilot expenses (including specialized trainings, builders and developer outreach, ride and drive events, and regional market transformation activities); and
- Pilot Evaluation costs.

During 2018, PGE began implementing the Pilots as described in Attachment A. Planned activities for the Pilots are also discussed in Attachment A.

II. OAR 860-027-0300 Requirements

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

a. Description of Amounts

PGE proposes that the deferral continue for 10 years and is capped at a maximum allowable cost of \$4.3 million (10-year net present value in 2017 dollars) as approved by Commission Order No. 18-054, and listed in Table 1, below.

Table 1
Maximum Allowable Costs (\$000)
10-Year Net Present Value (2017 Dollars)

Pilot	Amount
TriMet Electric Mass Transit Pilot	\$800
Education and Outreach Pilot	\$400
Electric Avenue Pilot	\$2,600
Evaluations	\$500
Total	\$4,300

b. Reasons for Deferral

See Deferral History. The granting of this Application will minimize the frequency of rate changes and/or match appropriately the costs borne by and benefits received by customers. As PGE presented in the UM 1811 Transportation Electrification workshops, approval of a cost-recovery mechanism is necessary to proceed with the Pilots because the costs are not included in customer prices or any other recovery mechanism. PGE expects the deferred amount to be recovered or refunded in a manner approved by the Commission.¹

Although PGE's initial application addressed the Pilots' capital costs and proposed that the deferral support the use of an automatic adjustment clause rate schedule to recover those costs, we understand that a Commission decision in Docket No. UM 2004 will likely determine the regulatory treatment of those aspects.

c. Proposed Accounting for Recording Amounts Deferred.

PGE proposes to record the deferred amount as a regulatory asset in FERC account 182.3, Other Regulatory Assets, with a credit to FERC account 456, Other Revenue.

¹ Earlier this year, PGE filed Schedule 150 to recover incremental costs associated with these Pilots. The Commission, at its April 23, 2019 regular public meeting, suspended the tariff for investigation to occur over six months

d. Estimate of Amounts to be Recorded for the Next 12 months.

As shown in Table 2 below, PGE estimates the net costs of the Pilots to be approximately \$0.4 million for the next 12 months (see work papers for additional detail).

Table 2
Pilot Costs Over the Next 12 Months (000's)

Pilot	2019 Forecast	2020 Forecast	Estimated Totals
Electric Avenue	\$66	\$13	\$79
TriMet ²	0	0	0
Education and Outreach	\$187	\$45	\$232
Evaluation	\$86	\$40	\$128
Totals	\$339	\$98	\$437

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with Notice are attached to the application as Attachment B. In compliance with the provisions of 860-027-0300(6), PGE is serving Notice of Application on PGE's most recent General Rate Case (OPUC Docket No. UE 335) service list.

III. Summary of Filing Conditions.

a. Earnings Review

PGE proposes that cost recovery associated with the Pilots not be subject to an earnings review since it would be subject to an automatic adjustment clause.

b. Prudence Review

PGE will submit Pilot evaluation reports that will provide detailed cost summaries. A prudence review can also be performed during the Pilot's operations.

² Net costs for TriMet equal zero.

c. Sharing

All prudently incurred costs and benefits would be collected or refunded from or to customers with no sharing mechanism.

d. Rate Spread/Rate Design

Costs will be allocated using the applicable rate schedule's forecasted energy based on an equal percent of revenues applied on a cents per kWh basis to each applicable rate schedule.

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

The amortization of the Pilot's deferred costs will be subject to the three percent test in accordance with the 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.

IV. PGE Contacts

The authorized addresses to receive notices and communications in respect to this Application are:

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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:

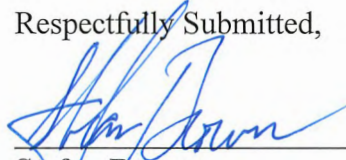
Stefan Brown, Manager
E-mail: stefan.brown@pgn.com

V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the costs and revenues associated with the Pilots.

DATED this April 23, 2019.

Respectfully Submitted,



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Attachment A

Implementation Detail for Transportation Electrification Pilots

Electric Avenue Network

Electric Avenue Network Expansion 2018 Activity

In 2018, Portland General Electric Company's (PGE's) Customer Energy Solutions (CES) department worked in the following key areas regarding Electric Avenue: site acquisition, site design and development, hardware and software sourcing.

Site Acquisition

Site acquisition began with the team working with PGE's Geospatial Information Services (GIS) department to determine where there are higher concentrations of electric vehicles (EVs) and to model the expected growth in EV ownership in the coming years. Data sources included existing Direct Current Quick Chargers (DCQC), Oregon Census Blocks, existing EVs in our service territory, personas created by PGE's Customer Insights department, and projected traffic volumes in the year 2025. Through data processing and analysis, we can visualize where there will be the greatest demand for new EV charging stations now and in the future. Equipped with the information from the GIS process and analysis, the team then began identifying areas of interest. Working closely with PGE's Local Government Affairs department and PGE's Key Customer Management department, the team conversed with several entities to gauge interest in being a site host for an Electric Avenue. In parallel with the site host engagement process, the team made field visits to sites of interest to analyze how each site met the siting criteria of visibility, accessibility, amenities, proximity to the distribution grid and proximity to underserved communities. These field visits allowed the team to identify prime locations for development and pursue the execution of site host agreements. In 2018, three of the six sites (Approved in OPUC Order No. 18-054) were acquired with fully executed agreements: Milwaukie (10834 SE McLoughlin Blvd, Milwaukie, OR 97222), Hillsboro (2295 SE Tualatin Valley Highway, Hillsboro, OR 97123), and East Portland (next to 4124 SE 82nd Ave, Portland, OR 97266).

Hardware and Software Selection

PGE's Supply Chain Management department issued a request for proposals (RFPs) in February 2018 for EV charging hardware and back-end software services. An internal steering committee reviewed bids from approximately nine vendors and recommended three vendors for in-person presentations to representatives from PGE's Market Insights, Information Technology, Operations and Maintenance, Transmission and Distribution, Supply Chain, Property Management, and CES departments. In April 2018, representatives from PGE's CES and Operations and Maintenance teams conducted final reviews of hardware providers through factory and demonstration site visits.

The outcome of this process resulted in the selection of BTC Power DCQC, Level 2 hardware, and Greenlots' backend software services. In July 2018, PGE's Supply Chain Management team negotiated contract terms and conditions, issued purchase orders for the equipment required for Electric Avenue locations one through three, and received and installed the hardware required for the Milwaukie Electric Avenue (discussed further below).

Site Design and Development

The team decided to pursue site design and development through the design-bid-build approach. Partnering with a local engineering firm to manage the site design process, the team held several site visits, meetings and consultative sessions with the site host to finalize the site designs for sites

one and two. Upon finalized designs for two sites, a formal construction RFP process was held for both locations, including a site walk, before the construction contracts were awarded. Site one, located in downtown Milwaukie, began development in November 2018 while plans for the Hillsboro location were finalized.

Electric Avenue Network Expansion 2019 Activity

PGE continued to focus on site acquisition, site development, and commissioning activities in Q1 and early Q2 of 2019.

Site Acquisition

PGE continued site acquisition activities into early 2019 with the acquisition of the fourth location in Wilsonville (8200 SW Wilsonville Rd, Wilsonville, OR 97070). Negotiations for locations five and six are ongoing.

Hardware and Software Selection

PGE placed an equipment order for locations four and five in early 2019 through the vendors selected in 2018. The equipment orders for location six will be placed once the final site design is determined.

Site Design and Development

Construction of the Milwaukie location was completed in early Q1 and a grand opening event was held on April 6, 2019. Construction of the Hillsboro location began in February 2019 and a grand opening event will be held May 18. After design and engineering work was completed for the Milwaukie and Hillsboro locations, PGE determined that a design, bid, and build approach resulted in inefficient coordination between design and construction firms. For locations four through six, PGE switched their design and development procurement strategy to a design – build approach. PGE’s Supply Chain team collected complete bids through a RFP process and a design - build contract was awarded.

PGE will continue work through 2019 with the East Portland and Wilsonville sites entering the engineering and permitting stages in Q2. PGE expects these locations, as well as locations five and six, to be developed and commissioned by the end of 2019.

Operations and Maintenance

PGE entered into operations and maintenance contracts with the hardware provider, BTC Power, to conduct routine annual maintenance and emergency repairs. PGE’s internal operations and maintenance staff also began conducting remote monitoring and periodic on-site inspections.

Education and Outreach

Electric Avenue grand openings are an opportunity to raise awareness of the new charging infrastructure within the local communities, which we leverage to increase awareness in our service territory through various communication channels. Our focus is to create an event that is compelling for residents and lets them see the infrastructure in person (including contracting with local food vendors, entertainment and family activities), learn about EVs and EV charging, and experience an EV through coordinated ride and drive’s which we have partnered with Forth to deliver. We are coordinating with local government on messaging strategy and tactics.

Electric Avenue Network Expansion 2020 Expected Activity

PGE anticipates focusing on network operations and maintenance and marketing activities in 2020.

Operations and Maintenance

PGE expects internal operations and maintenance resources to continue conducting remote monitoring and periodic on-site inspections in coordination with a third-party vendor for routine maintenance and emergency repairs.

Education and Outreach

PGE expects to continue marketing our Electric Avenue infrastructure to encourage utilization, support EV adoption by addressing fast charging availability concerns, and providing resource to EV adopters with home charging challenges.

TriMet

TriMet Mass Transit 2.0 2018 Activity

PGE's CES team spent 2018 negotiating and executing the agreement between TriMet and PGE, providing technical support and project management services, and developing a bus charging infrastructure operations and maintenance program. During this time, TriMet began the construction of the overhead fast charging infrastructure at Sunset Transit Center and the overnight depot charging infrastructure at its Merlo Garage facility.

Contract Negotiations

PGE's CES, Legal, and Operations and Maintenance teams spent the first quarter of 2018 negotiating the terms and conditions for PGE's ownership of the charging infrastructure required for TriMet's electric bus pilot. The agreement was fully executed in April of 2018 and includes provisions for the transfer of funds between PGE and TriMet, the conditions under which PGE would accept ownership of the infrastructure, and the operations and maintenance services that PGE would provide during the pilot. PGE provided project funding to TriMet shortly after contract execution.

Technical Support and Project Management

PGE's CES, Transmission and Distribution, Service Design, and Operations and Maintenance teams provided technical support and project management services throughout the year. PGE provided guidance on the most flexible and cost-effective methods of connecting the charging infrastructure at Sunset Transit Center and Merlo Garage to PGE's distribution grid, insight into site layout and construction, and held regular meetings with TriMet, Center for Transportation and the Environment (CTE, TriMet's project implementation contractor), and other vendors.

Operations and Maintenance Program Development

PGE's CES and Operations and Maintenance team staff worked with TriMet, New Flyer (bus manufacturer), and ABB (charging infrastructure manufacturer) to develop a charging infrastructure operations and maintenance program. The program will utilize PGE staff to remotely monitor the equipment and conduct visual inspections as needed with ABB staff providing remote diagnostic, routine maintenance, and emergency repair services.

TriMet Mass Transit 2.0 2019 Activity

PGE continues to provide technical support, project management, and operations and maintenance services.

Technical Support and Project Management

PGE's CES and Operations and Maintenance teams continue to provide technical support and project management services during site construction and commissioning. Construction of charging infrastructure at Sunset Transit Center and Merlo Garage were completed by early to mid-2019.

Operations and Maintenance Program Development

PGE completed contract negotiations with ABB and New Flyer and purchased spare parts for repairs. As the equipment is fully commissioned and is found to meet PGE's acceptance criteria,

PGE will accept ownership of the charging infrastructure and formally begin providing operations and maintenance services. This is expected to happen in the summer or fall of 2019.

Education and Outreach

PGE partnered with TriMet on the promotion of the electric bus, as well as the opening event. We supported the event with the production and distribution of collateral, branded charging infrastructure and through mass market communications and press release. We will also support customer open house events intended to familiarize the public with the new bus line and benefits of electrified mass transit.

TriMet Mass Transit 2.0 2020 Expected Activity

PGE anticipates focusing on infrastructure operations and maintenance and marketing activities in 2020.

Operations and Maintenance

PGE expects internal operations and maintenance resources to continue conducting remote monitoring and period inspections in coordination with a third-party vendor for routine maintenance and emergency repairs.

Market Transformation

Market Transformation 2018 Activity

Chargeway

PGE's CES team worked with Supply Chain and Legal to negotiate and contract with Chargeway to deploy Chargeway Beacons in local auto dealerships. Chargeway utilizes a simple number and color system to explain charging capabilities of all EV's available in the marketplace. The agreement was fully executed in October 2018 and covers deployment of three Chargeway Beacons in EV auto dealerships throughout our service territory. We placed our first Chargeway Beacon at Wilsonville Chevrolet in November 2018. We trained the staff on the features and benefits of the Chargeway Beacon and platform. In addition to Beacon placement, we labeled our Electric Avenue infrastructure using the Chargeway nomenclature. We are the first utility nationally to partner with Chargeway.

Market Transformation 2019 Activity

Portland International Auto Show

PGE partnered with Forth, PacifiCorp, Clark PUD, and Chargeway to sponsor the Electric Avenue EV display at the 2019 Portland International Auto Show January 24th-27th. Electric Avenue's goal is to bring together regional partners to promote EVs, and EV charging to likely car buyers. In addition to EV's and EV charging, we also had several Chargeway Beacons on display at the auto show to help familiarize attendees with electric fuel, and how the Chargeway platform can make it easier to drive an EV.

Roadmap 12

Roadmap is the nation's largest EV conference and is hosted each year by Forth. PGE has chosen to be a presenting sponsor of this event, and recognizes its value in bringing together, utilities, policy makers, nonprofits, government and auto manufacturers to discuss issues related to the mass adoption and deployment of EVs, and its supporting infrastructure. Roadmap will be taking place at the Oregon Convention Center on June 18th & 19th.

Transportation Network Company Promotion

Both Uber and Lyft have developed platforms which enable users to select a "Green Option" when requesting a ride on the app. PGE recognizes this as an opportunity to get more riders in EVs, with the intent of educating and addressing myths about EVs. We are working with Lyft to develop a promotion code, as well as marketing materials to accompany drivers during the promotional period. We intend to deploy this promotion in Q3 of 2019.

Market Transformation 2020 Expected Activity

Portland International Auto Show

PGE expects to partner with Forth on Electric Avenue at the Portland International Auto Show in 2020.

Technical Assistance/Builder Outreach

Technical Assistance/Builder Outreach 2019 Activity

PGE will develop technical assistance and builder outreach, marketing materials, program tools, calculators and web content in support of the expansion of our engagement efforts. Once developed we will have targeted communications promoting EVs benefits and charging options. We will focus on are commercial, retail, multifamily, and developer customer groups.

Technical Assistance/Builder Outreach 2020 Expected Activity

PGE expects to continue our efforts to engage and support commercial customers and developers in their efforts to implement commercial/residential charging at their developments.

Attachment B

Notice of Application for Reauthorization of the Deferral of Costs and Revenues Associated with the Transportation Electrification Pilots

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1938

**In the Matter of the Application of Portland) Notice of Application for Reauthorization
General Electric Company for an Order) of the Deferral of Costs and Revenues
Approving the Deferral of Costs and) Associated with the Transportation
Revenues Associated with Transportation) Electrification Pilots
Electrification Pilots**

On April 23, 2019, Portland General Electric Company (“PGE”) filed an application with the Public Utility Commission of Oregon (the “Commission”) for an Order authorizing deferral of costs and revenues associated with transportation electrification Pilots

Approval of PGE’s Application will support the use of an automatic adjustment clause rate schedule, which will provide for changes in prices reflecting incremental costs associated with the Pilots.

Persons who wish to obtain a copy of PGE’s application will be able to access it on the Commission website.

Any person who wishes to submit written comments to the Commission on PGE’s application must do so no later than May 23, 2019.

Dated this April 23, 2019




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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application for the Reauthorization of the Deferral of Costs and Revenues Associated with the Transportation Electrification Pilots** to be served by electronic mail to those parties whose email addresses appear on the attached service list to those parties on the attached service lists for OPUC Dockets UM 1938 and UE 335.

Dated at Portland, Oregon, this 23rd day of April, 2019.



Stefan Brown

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UM 1938

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