



Portland General Electric

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April 23, 2024

Via Electronic Filing

Public Utility Commission of Oregon
P. O. Box 1088
Salem, OR 97308-1088

**RE: UM 1938 Application to Reauthorize Deferred Accounting of Costs and Revenues
Associated with Transportation Electrification Pilots**

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with PGE's Transportation Electrification Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UE 416 and UM 1938 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488, or email Stephen Leeb at stephen.leeb@pgn.com

Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Senior Manager, Revenue Requirement

JF/dm
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1938**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Reauthorization of Deferred
Accounting of Costs Associated with the
Transportation Electrification Pilots.

**PORTLAND GENERAL ELECTRIC
COMPANY'S REQUEST FOR
DEFERRAL REAUTHORIZATION**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (PGE) hereby respectfully requests reauthorization to defer the costs and revenues associated with the Transportation Electrification Pilots (TE Pilots or Pilots) approved by the Public Utility Commission of Oregon (Commission or OPUC) in Order No. 18-054 and later modified by Order No. 19-385 (Docket No. UM 1811). We request this reauthorization to be effective April 23, 2024, through April 22, 2025. PGE has proposed that the amounts deferred for this program be placed into base rates within the 2025 general rate case filed under Docket UE 435. Should this proposal be adopted, this deferral will end December 31, 2024.

I. Deferral History

In alignment with the State of Oregon's policy direction of promoting transportation electrification,¹ PGE's TE Pilots support increasing access to the use of electricity as a transportation fuel and are consistent with PGE's decarbonization, electrification, and performance imperatives.

¹ ORS 757.357(2).

In accordance with Commission Order Nos. 18-054 and 19-385 as well as OAR 860-087-0030, PGE launched three TE Pilots: Electric Avenue (10 years), TriMet Mass Transit (10 years), and Education and Outreach (3 years), and has and will incur incremental costs, including costs 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.

Due to the COVID-19 pandemic, many of the Education and Outreach events were cancelled as in-person activities were limited. Commission Order Nos. 18-054 and 19-385 both limit the Education and Outreach activities to three years ending in April 2021. In the April 23, 2021 application to reauthorize deferred accounting in this docket, PGE requested an extension of education & outreach activities due to the COVID-19 pandemic. The reauthorization application was approved in Order No. 21-475 without objection to the extension. As of the end of 2021, the education and outreach budget was mostly exhausted and only minor reporting fees were incurred in 2022, marking the conclusion of the Education and Outreach Pilot.

Completed activities for 2023 and the planned activities for 2024 for all three TE Pilots are described in Attachment A, “Implementation Detail for Transportation Electrification Pilots.”

To address these Pilots’ costs, PGE has filed and received authorization for deferred accounting as shown in Table 1, below.

**Table 1
UM 1938 Authorizations**

Filing Date	Deferral Period	Order No.
4/23/2018	4/23/2018 – 4/22/2019	20-381
4/23/2019	4/23/2019 – 4/22/2020	20-381
2/21/2020	Supplemental filing to clarify deferral	20-381
4/23/2020	4/23/2020 – 4/22/2021	20-381
4/23/2021	4/23/2021 – 4/22/2022	21-475
4/22/2022	4/23/2022 – 4/22/2023	23-255
4/21/2023	4/23/2023 – 4/22/2024	23-256
4/23/2024	4/23/2023 – 4/22/2024	Pending

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 the 10 years of the Pilots and be capped at a maximum allowable operations and maintenance (O&M) costs of \$3.8 million as approved by Commission Order No. 19-385 and listed in Table 2 below.

**Table 2
Maximum Allowable O&M Costs (\$000)**

Pilot	Amount
TriMet Electric Mass Transit Pilot (net)	\$0
Education and Outreach Pilot	\$480
Electric Avenue Pilot	\$2,787
Evaluations	\$580
Total	\$3,847

b. Reasons for Deferral

See Deferral History. The granting of this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers.² As PGE presented in the UM 1811 Transportation Electrification workshops and in subsequent deferral filings, 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.

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 net costs of the Pilots to be approximately \$0.4 million for the next 12 months and are included in the calendar year forecasts as presented in Table 3 below. Forecast amounts for 2025 are included in our 2025 GRC, UE 435.

Table 3
Pilot O&M Costs (Net of applicable revenues)*

	2018	2019	2020	2021	2022	2023	2024	
Pilot:	Actual	Actual	Actual	Actual	Actual	Actual	Forecast	Total
Electric Avenue	\$2,966	\$(333)	\$538	\$(41,526)	\$(63,591)	\$695,449	\$65,000	\$658,503
Trimet	\$	\$	\$	\$	\$(42,646)	\$	\$(75,000)	\$(117,646)
Education and Outreach	\$46,479	\$69,438	\$155,619	\$135,252	\$7,500	\$	\$	\$414,592
Evaluation	\$40,783	\$83,626	\$	\$210,942	\$70,428	\$90,678	\$36,956	\$533,413
Total	\$90,229	\$152,731	\$156,461	\$304,669	\$(28,310)	\$786,127	\$26,956	\$1,488,862

² ORS 757.259 (2)(e).

*Please note that numbers are reflective of corrections in prior years reflected in 2021 and 2023.

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with the Notice of Application are attached to the application as Attachment B. In compliance with the provisions of OAR 860-027-0300(6), PGE is serving the Notice of Application on the UM 1938 and UE 416 service lists.

III. Summary of Filing Conditions

a. Earnings Review

Cost recovery associated with the Pilots will be subject to an earnings review in accordance with ORS 757.259(5).

b. Prudence Review

PGE will submit Pilot evaluation reports that will provide detailed cost summaries. If and when PGE proposes cost recovery for the TE programs in this filing, all costs will be subject to a prudence review per the stipulation in UM 1811, subject to OPUC Order No. 19-385.

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 Pilots' deferred costs will be subject to the three percent test in accordance with ORS 757.259(6) and (8), which limits aggregated deferral amortizations 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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Assistant General Counsel
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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, Senior Manager Revenue Requirement
Email: jacquelyn.ferchland@pgn.com

V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the costs and revenues associated with the Pilots, effective April 23, 2023.

DATED this 23rd day of April 2023.

Respectfully Submitted,

/s/ Jaki Ferchland

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UM 1938

Attachment A

Implementation Detail for Transportation Electrification Pilots

Electric Avenue Pilot

Electric Avenue Network 2023 Activity

1. Operations and Maintenance

PGE continued software and cellular service agreements with Shell Greenlots. Due to the Electric Avenue charging equipment being out of warranty, PGE built out its maintenance staff with trained and certified PGE Wiremen and Wiremen Helpers to support inspection, testing and repair of our charging infrastructure. In addition, we procured a surplus of spare parts for Level 2 and DC fast charging equipment. PGE continued to use internal operations and maintenance resources to conduct remote monitoring and periodic on-site inspections for routine maintenance and to detect the need for emergency repairs. The downtime of chargers increased in 2023 and replacement of the chargers was investigated. New chargers were identified and will be replaced in 2024 through a previously established DEQ funded Clean Fuels grant supporting the replacement of non or low functioning public charging infrastructure.

Electric Avenue Network Expected 2024 Activity

1. Operations and Maintenance

In 2024 our field and maintenance crew will be focused on maintaining our current charging infrastructure consisting of 180 ports, replacing the Electric Avenue pilot chargers with updated charger technology, and support the expansion of our charging infrastructure to include pole charging and fleet charging.

2. Schedule 50 rate change proposal

In UE 435, filed in February 2024, PGE has proposed changes to Schedule 50, the retail charging rate at PGE's public charging options. To support the wide-range of EV options with battery sizes and charging speeds, PGE proposed moving from a flat rate per session to a per kwh rate for both Level 2 charging and DCFC charging. This rate has been constructed to be comparable with the weighted average of mid and off-peak time of day ("TOD") residential rates plus an on-peak adder for on-peak charging that is comparable to the TOD on-peak rates. PGE also proposed an income-qualified discount to the per kwh rate to support the equitable transition of EV ownership and public charging for PGE income-qualified customers. This will help support an equitable transition in light of the monthly subscription removal from Schedule 50 due to the change in charger technology. Based on customer input, an idle fee has been proposed which begins 10 minutes after a car has completed its charge. Schedule 50 proposed changes will not be implemented in 2024 but will be implemented pending the decision and timing of UE 435.

3. Marketing

PGE plans to conduct communications regarding the change in chargers and functionality at Electric Avenues. There will be marketing activities to increase awareness of current and future retail charging, including Electric Avenues and on street/pole charging. The goal will be to raise awareness of public charging options such as neighborhood charging through pole charging along with Electric Avenues to support underserved communities in making an equitable transition to electric vehicle ownership.

TriMet Mass Transit Pilot

In 2018, OPUC approved a pilot with TriMet whereby PGE owns, operates, and maintains high-powered charging infrastructure for TriMet's first all-electric bus line. Throughout 2018, PGE worked closely with TriMet to design, install, commission, and operate the proposed electric bus charging infrastructure. PGE provided guidance on the most flexible and cost-effective methods to connect the charging infrastructure at Sunset Transit Center and Merlo Garage to PGE's distribution grid, provided insight into site layout and construction, and held regular meetings with TriMet and other construction contractors.

TriMet Mass Transit 2.0 2023 Activity

PGE continued work in 2023 on charging infrastructure operations and maintenance. Post pandemic recovery showed increased ridership use of electric buses which led to increased use of charging infrastructure. The PGE Electric Vehicle operations and maintenance (EV O&M) team completed replacement of the depot boxes provided by ABB and worked through some interoperability issues between two differing Battery Electric Bus (BEB) manufacturers, which improved uptime by 5% year over year to the current 98%+ annual average. Fixing the interoperability issues increased TriMet confidence in transitioning more of their fleet to electric transit buses. As a result, they have ordered additional buses and participated in PGE's Fleet Partner pilot to support the expansion of their charging infrastructure in additional locations.

1. Operations and Maintenance

PGE internal operations and maintenance resources continued conducting remote monitoring and periodic inspections in coordination with a third-party vendor for routine maintenance and emergency repairs. In 2023, PGE completed warranty installations to replace vital components of TriMet's charging infrastructure that were being damaged by weather and effecting performance. PGE's EV operations and management team completed charger manufacturer training and has added more PGE electricians and technician helpers for the installation, inspection, testing, and repair of transit bus charging infrastructure. With consistent maintenance and regular monitoring, the chargers at TriMet have been performing above the 98% uptime threshold. PGE did not defer expenses related to TriMet Mass Transit Pilot Activities.

TriMet Mass Transit 2.0 2024 Expected Activity

For 2024 PGE will continue with the revamped annual maintenance plan to ensure chargers are running and meeting uptime metrics.. PGE does not anticipate incurring any expenses that will be deferred in future program years.

Education and Outreach Detail

PGE has focused its Education and Outreach in two areas: Market Transformation and Technical Assistance/Commercial Outreach. Market Transformation is aimed at redefining electric fuel for our customers and the vehicle sales community. The education and outreach budget has been exhausted and no deferral activities are planned in 2024.

Attachment B

Notice of Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with Transportation Electrification Pilots

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1938

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Reauthorization of Deferred
Accounting of Costs Associated with the
Transportation Electrification Pilots.

**PORTLAND GENERAL ELECTRIC
COMPANY'S NOTICE OF REQUEST
FOR DEFERRAL
REAUTHORIZATION**

On April 23, 2023, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission) for an Order reauthorizing deferral of costs and revenues associated with Transportation Electrification Pilots.

Approval for deferred accounting treatment will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

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 19, 2023.

DATED this 23rd day of April 2023.

/s/ Jaki Ferchland

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with 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 416.

Dated at Portland, Oregon, this 23rd day of April 2023.

/s/ Jaki Ferchland

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