



**Portland General Electric Company**  
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February 22, 2022

***Via Electronic Filing***

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

**RE: UM 2003 PGE's Application for Reauthorization of Deferral of Costs Associated with PGE's Electric Vehicle Charging Pilots**

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization of the Deferral of Costs Associated with PGE's Electric Vehicle Charging Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UE 394 and UM 2003 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.

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 2003**

IN THE MATTER OF  
PORTLAND GENERAL ELECTRIC COMPANY  
DEFERRAL OF COSTS ASSOCIATED WITH EV  
CHARGING PILOTS

**APPLICATION FOR  
REAUTHORIZATION OF DEFERRAL OF  
COSTS ASSOCIATED WITH PGE's  
ELECTRIC VEHICLE CHARGING  
PILOTS**

Pursuant to ORS 757.259, OAR 860-027-0300, and Commission Order No. 21-132, Portland General Electric Company (PGE) respectfully requests reauthorization to continue to defer costs associated with the two Electric Vehicle Charging Pilots (EV Charging Pilots or Pilots). PGE requests this reauthorization be effective February 22, 2022, through February 21, 2023, and be subject to an automatic adjustment clause recovered through Schedule 150 as requested in PGE Advice Filing No. 21-18.

**I. Deferral History.**

Public Utility Commission of Oregon (Commission or OPUC) Order No. 18-054 adopted a stipulation that authorized PGE to undertake three transportation electrification pilots and provided guidance for PGE to propose two additional pilots. The stipulating parties agreed that PGE will propose one residential and one business EV Charging Pilot within one year of the February 16, 2018, date of Order No. 18-054. In compliance, PGE submitted its EV Charging Pilot proposals as part of the initial filing in this docket on February 15, 2019. On February 22, 2019, PGE filed an amended application to correct the effective date of the deferral application and the filing condition related to Rate Spread/Rate Design. PGE filed and received authorizations for this deferral as shown in Table 1 below.

**Table 1**

<b>Filing Date</b>	<b>Renewal Period</b>	<b>Order No.</b>
2/15/2019	2/22/19 – 2/21/20	20-381
2/21/2020	2/22/20 – 2/21/21	20-381
2/11/2021	2/22/21 – 2/21/22	21-132

*Residential EV Charging Pilot*

The Residential EV Charging Pilot aims to encourage EV adoption by financially supporting and facilitating the installation of qualified connected charging stations. In addition, the Pilot explores mechanisms to realize the value of the delivery of grid services (demand response, daily load shifting, and load following) via the connected chargers. As part of the Residential EV Charging Pilot, PGE provides rebates (standard, income eligible and bring-your-own) to customers for the hardwired installation of qualifying Level 2 connected EV home chargers<sup>1</sup>. All rebate and incentive customers also receive seasonal performance rewards for participation in Smart Charging Program (grid services).

The Residential EV Charging Pilot had a soft launch on October 22, 2020 and was focused on PGE employees and targeted EV owners. Pilot participants were asked to provide feedback on their experience and were actively engaged in improving the customer experience. Twenty-four PGE customers were enrolled in the Pilot by January 3, 2021, with 12 requesting enrollments into the Schedule 7 Time of Use rate. Additionally, on December 2020, PGE launched the EV dealership referral program. Currently Chargeway Beacons are located in twelve local dealerships to test the referral process and the Pilot’s communication with customers. On January 4, 2021, PGE began efforts to market the Pilot to the entire residential segment. As of January 31, 2022, there are 480 enrolled customers with a 1.7% unenrollment

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<sup>1</sup> The exact characteristics of a qualifying charger will be based on a Request for Information and related responses by vendors.

rate, see Table 2 below for additional detail. PGE is targeting Pilot enrollment of 2,250 additional customers by year end 2022.

Table 2 – Enrollment Data for Residential EV Pilot

<b>Rebate/Incentive Type</b>	<b>Enrollments</b>	<b>Unenrollments</b>	<b>Total Applications</b>
Standard	425	10	435
Income Eligible	40	0	40
Bring Your Own Charger (BYOC)	15	2	17
<b>TOTAL</b>	<b>480</b>	<b>12</b>	<b>492</b>

*Business EV Charging Rebate Pilot*

PGE’s Business EV Charging Rebate Pilot aims to enable business customers to deploy charging infrastructure while assembling a portfolio of distributed energy resources that will be able to create future system value.

PGE’s Business EV Charging Rebate Pilot is designed to mitigate issues with cost, complexity, and effort that otherwise may preclude businesses from installing charging infrastructure. Through the pilot, PGE supports nonresidential customer deployments of charging infrastructure and reduces their associated costs. On July 17, 2020, PGE submitted a modified proposal for the Business EV Charging program pilot, designed to reflect the amended stipulation adopted by Commission Order No. 19-385 in Docket No. UM 1811. The modified proposal entailed a rebate of \$500 per charging port for non-residential customers installing qualified networked chargers and a rebate of \$2,300 per charging port for income-qualified multifamily properties. On December 15, 2020, the Commission approved PGE Schedule 52, which implemented the modified proposal effective December 18, 2020. Consequently, the Business EV Charging Rebate Pilot launched on December 18, 2020, with a new website, a list of 12 qualified products, application checklist, online application, and Frequently Asked Questions. On May 27, 2021, PGE submitted ADV 1273, a tariff amendment to increase the value of the standard rebate from \$500 per qualifying Level 2 port to \$1,000 per qualifying Level

2 port, effective July 1, 2021. On June 29, 2021, the Commission approved the tariff amendment in ADV 1273. Because the overall budget for the Pilot was established in the stipulation for Commission Order 19-385, this change did not increase the Pilot budget, and instead reduced the number of rebates issued, from approximately 1,000 rebates to approximately 588 rebates.

In 2021, there were eight total applicants for this program. Eight ports have been confirmed as installed, and \$4,000 in rebate payments have been issued to two customers, with an additional \$4,000 in rebate payments being issued in early 2022. Two additional customer applications are in progress and awaiting additional documentation. The two remaining applicants were not qualified for the rebate due to not installing qualified chargers or installing them prior to the tariff effective date.

#### **OAR 860-027-0300 Requirements.**

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

a. Description of Utility Expense for Which Deferred Accounting is Requested.

See Deferral History above.

b. Reasons for Deferral

Pursuant to ORS 757.259(2)(e), and for the reasons discussed above, PGE seeks deferred accounting treatment for the incremental operation and maintenance (O&M) costs associated with the EV Charging Pilots. 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.

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 expense accounts.

d. Estimate of Amounts to be Recorded Over the Next 12 Months

PGE expects to incur O&M costs of approximately \$1.9 million in 2022 for the Residential EV Charging Pilot, as provided in Table 3 below. Residential EV charging 2020 and 2021 expenses were significantly below the original forecast due to the delayed timing of various manufacturer integration costs now expected to be delivered in 2022.

**Table 3: Residential EV Charging Pilot Expected Costs**

In 000's	Actual			Forecast			
	2019	2020	2021	2022	2023	2024	2025
Administrative Costs -- EV	\$4.1	\$22.0	\$193.0	\$243.3	\$309.3	\$72.8	\$33.6
Administrative Costs -- Smart Charging	\$4.1	\$31.4	\$128.7	\$163.2	\$218.7	\$192.3	\$155.3
Incentives -- EV	\$ -	\$5.6	\$194.3	\$1,316.9	\$907.0	\$29.9	\$ -
Incentives -- Smart Charging	\$ -	\$ -	\$ -	\$147.1	\$94.9	\$163.8	\$195.4
<b>Total Costs</b>	<b>\$8.2</b>	<b>\$58.9</b>	<b>\$516.0</b>	<b>\$1,869.5</b>	<b>\$1,529.9</b>	<b>\$458.8</b>	<b>\$384.3</b>

The total cost of the Business EV Charging Rebate Pilot is capped at \$1 million pursuant to Commission Order No. 19-385. PGE expects to incur O&M costs of approximately \$443,000 in 2022, as provided in Table 4 below.

**Table 4: Business EV Charging Rebate Pilot Expected Costs**

In \$000s	Actual			Forecast		
	2019	2020	2021	2022	2023	Total
Rebates	\$ -	\$ -	\$4.0	\$318.0	\$318.0	\$640.0
Education & Outreach	\$ -	\$ -	\$30.6	\$50.0	\$49.0	\$129.6
Administrative Costs	\$52.4	\$26.4	\$1.5	\$50.0	\$50.0	\$180.3
Evaluation	\$ -	\$ -	\$ -	\$25.0	\$25.0	\$50.0
<b>Total Costs</b>	<b>\$52.4</b>	<b>\$26.4</b>	<b>\$36.1</b>	<b>\$443.0</b>	<b>\$443.0</b>	<b>\$1,000.9</b>

e. Notice

A copy of the Notice of Application for Reauthorization of Deferral of incremental O&M costs associated with the EV Charging Pilots and a list of persons served with the Notice are

attached to the Application as Attachment A. In compliance with the provisions of 860-027-0300 (6), PGE is serving Notice of Application on the UE 394 Service List, PGE's current general rate case, and the UM 2003 Service List.

**II. The following is provided pursuant to OAR 860-027-0300(4):**

a. Description of Deferred Account Entries

Please see sections II (a) and II(c) above.

b. The Reason for Continuing Deferred Accounting

PGE seeks approval to continue to defer incremental O&M costs associated with the two EV Charging Pilots proposed with PGE's initial deferral application. Without reauthorization this deferral will expire on February 21, 2022.

**III. Summary of Filing Conditions.**

a. Earnings Review

Cost recovery associated with this deferral will not be subject to an earnings review since 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 their review of this deferral's annual reauthorization filing or application to update Schedule 150.

c. Sharing Percentages

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

d. Rate Spread / Rate Design

Applicable costs will be allocated to each schedule using the applicable schedule's forecasted energy (including direct access cost of service) based on an equal percent revenue applied on a cents-per-kWh basis with direct access priced at cost of service.

e. Three Percent Test (OAR 757.259 (6))

The amortization of the 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.

**IV. PGE Contacts**

The authorized addresses to receive notices and communications in respect to this

Application are:

Loretta Mabinton  
Managing Assistant General Counsel  
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Portland OR 97204  
(503) 464-7822  
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PGE-OPUC Filings  
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Portland General Electric Company  
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Portland OR 97204  
(503) 464-7805  
pge.opuc.filings@pgn.com

In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Megan Stratman, Regulatory Consultant  
E-mail: [megan.stratman@pgn.com](mailto:megan.stratman@pgn.com)



V. **Conclusion**

For the reasons stated above, PGE requests permission to continue to defer the Deferred Amount as described herein from the date of this application.

DATED this 22<sup>nd</sup> day of February 2022.

*/s/ Jaki Ferchland*

Jaki Ferchland,  
Manager, Revenue Requirement  
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121 SW Salmon St., 1WTC 0306  
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## **Attachment A**

### **Notice of Application for Reauthorization of Deferral of Costs Associated With PGE's Electric Vehicle Charging Pilots**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 2003**

IN THE MATTER OF  
PORTLAND GENERAL ELECTRIC COMPANY  
DEFERRAL OF COSTS ASSOCIATED WITH EV  
CHARGING PILOTS

**NOTICE OF APPLICATION FOR  
REAUTHORIZATION OF DEFERRAL OF  
COSTS ASSOCIATED WITH PGE's  
ELECTRIC VEHICLE CHARGING  
PILOTS**

On February 22, 2022, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission or OPUC) for an Order authorizing the continuance of the deferral of operation and maintenance (O&M) costs associated with the Electric Vehicle Charging 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 March 22, 2022.

Dated: February 22, 2022

*/s/ Jaki Ferchland*

Jaki Ferchland  
Manager, Revenue Requirement  
Portland General Electric Company  
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(503) 464-7488  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Reauthorization of Deferral of Costs Associated with PGE's Electric Vehicle Charging Pilots** to be served by electronic mail to those parties whose email addresses appear in the attached service lists for OPUC Docket No. UE 394 and UM 2003.

Dated at Portland, Oregon, this 22<sup>nd</sup> day of February, 2022.

*/s/ Jaki Ferchland*

**Jaki Ferchland**  
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