



Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

February 22, 2023

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.

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

JF/dm
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. 22-263, 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, 2023, through February 21, 2024, and be subject to an automatic adjustment clause recovered through Schedule 150 as approved in Commission Order No. 22-129 and Advice Filing 22-38.

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. Then in UE 394, PGE asked to recover deferred costs for UM 2003 under Schedule 150 and according to HB 2165 which allows for costs to be allocated to all customers based on total revenues. On April 25, 2022, Order 22-129 affirmed

that PGE can collect for current EV pilots under Schedule 150 but denied the ability to allocate costs under HB 2165 and instead ordered costs for existing EV pilot programs to be recovered consistent with distribution revenues. PGE filed and received authorizations for this deferral as shown in Table 1 below.

Table 1

Filing Date	Renewal Period	Order No.
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
2/22/2022	2/22/22 – 2/21/23	22-263

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 residential 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, bring-your-own, and vehicle telematics) to customers for the hardwired installation of qualifying Level 2 connected EV home chargers.¹ All rebate and incentive customers also receive seasonal performance incentives for participation in the Smart Charging Pilot (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 residential pilot by January 3, 2021, with 12 requesting

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

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 nine local dealerships to test the referral process and the Pilot’s communication with customers. On January 4, 2021, PGE began efforts to market the residential pilot to the entire residential segment. As of January 1, 2023, there are 2,230 enrolled customers with a 3% unenrollment rate. See Table 2 below for additional details. PGE is targeting residential pilot enrollment of 3,880 customers by year end 2023.

**Table 2
Enrollment Data for Residential EV Pilot**

Rebate/Incentive Type	Enrollments	Unenrollments	Total Enrollments
Standard	1,105	33	1,072
Income Eligible	93	6	87
Bring Your Own Charger (BYOC)	28	2	26
Vehicle Telematics	1,072	27	1,045
TOTAL	2,298	68	2,230

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 business 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 Rebate 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 to \$1000 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 business pilot was established in the stipulation for Commission Order 19-385, this change did not increase the budget, and instead reduced the number of rebates issued, from approximately 1,000 to 588 rebates.

In 2022, there were twenty-two total applicants for this program. Seventy-four ports were installed, and \$74,000 in rebate payments were issued to seventeen customers. The cost actuals for 2022 rebate payments include payments made to customers who submitted 2021 applications, which needed additional documentation, and were paid in 2022. Four applicants were not qualified for the rebate because they did not install qualified chargers. One application received late in 2022 needed additional review and will be processed in 2023.

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 \$1.7 million in 2023 for the Residential EV Charging Pilot, as provided in Table 3 below.

**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	\$46.3	\$134.0	\$91.0	\$ -
Administrative Costs -- Smart Charging	\$4.1	\$31.4	\$128.7	\$107.2	\$591.7	\$659.7	\$686.4
Incentives -- EV	\$ -	\$5.6	\$194.3	\$488.4	\$650.6	\$310.0	\$ -
Incentives -- Smart Charging	\$ -	\$ -	\$ -	\$47.7	\$304.0	\$400.0	\$400.0
Total Costs	\$8.2	\$58.9	\$516.0	\$689.5	\$1,680.3	\$1460.7	\$1086.4

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 \$432,000 in 2023, as provided in Table 4 below.

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

In \$000s	Actual			Forecast		Total
	2020	2021	2022	2023	2024	
Rebates	\$ -	\$4.0	\$78.8	\$419.0	\$365.0	\$866.8
Education & Outreach	\$ -	\$30.6	\$0.7	\$2.0	\$ -	\$33.2
Administrative Costs	\$26.4	\$1.5	\$2.9	\$4.0	\$3.0	\$90.1
Other	\$ -	\$ -	\$5.8	\$7.0	\$3.0	\$15.8
Total Costs	\$26.4	\$36.1	\$88.1	\$432.0	\$371.0	\$1,005.9

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 most recent 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, 2023.

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

As established in Docket No. UE 394, Commission Staff and parties agreed that PGE Schedule 150 costs associated with UM 2003 should be allocated based on an equal percent of distribution revenue applied on a cents-per-kWh basis.

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

The amortization of the pilots' deferred costs will not be subject to the three percent test, 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:

Kim Burton
Assistant General Counsel
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
(573) 356-9688
kim.burton@pgn.com

PGE-OPUC Filings
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street
Portland OR 97204
(503) 464-8172
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

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 22nd day of February 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon St, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: jacquelyn.ferchland@pgn.com

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, 2023, 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.

Approval of PGE's Application will not authorize a change in PGE's rates but will permit consideration of rate treatment in a subsequent proceeding.

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 19, 2023.

Dated: February 22, 2023

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon St, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: jacquelyn.ferchland@pgn.com

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 22nd day of February, 2023.

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement
Portland General Electric Company
121 SW Salmon St, 1WTC0306
Portland, OR 97204
Telephone: 503.464.7488
E-Mail: jacquelyn.ferchland@pgn.com

**SERVICE LIST
OPUC DOCKET No. UE 394**

RALPH CAVANAGH NATURAL RESOURCES DEFENSE COUNCIL	111 SUTTER ST FL 20 SAN FRANCISCO CA 94104 rcavanagh@nrdc.org
LAUREN MCCLOY NW ENERGY COALITION	811 1ST AVE SEATTLE WA 98104 lauren@nwenergy.org
MICHELLE ORTON-BROWN WALMART	morton- brown@parsonsbehle.com
WILLIAM STEELE (C) BILL STEELE AND ASSOCIATES, LLC	PO BOX 631151 HIGHLANDS RANCH CO 80164 w.steele1@icloud.com
AWEC	
JESSE O GORSUCH (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 jog@dvclaw.com
CORRINE MILINOVICH (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY, STE. 450 PORTLAND OR 97201 com@dvclaw.com
TYLER C PEPPLER (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com
CALPINE SOLUTIONS	
GREGORY M. ADAMS (C) (HC) RICHARDSON ADAMS PLLC	515 N 27TH ST BOISE ID 83702 greg@richardsonadams.com
GREG BASS CALPINE ENERGY SOLUTIONS, LLC	401 WEST A ST, STE 500 SAN DIEGO CA 92101 greg.bass@calpinesolutions.com
KEVIN HIGGINS (C) (HC) ENERGY STRATEGIES LLC	215 STATE ST - STE 200 SALT LAKE CITY UT 84111- 2322 khiggins@energystrat.com

FRED MEYER

JUSTIN BIEBER (C)
FRED MEYER/ENERGY
STRATEGIES LLC

215 SOUTH STATE STREET,
STE 200
SALT LAKE CITY UT 84111
jbieber@energystrat.com

KURT J BOEHM (C)
BOEHM KURTZ & LOWRY

36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

JODY KYLER COHN (C)
BOEHM KURTZ & LOWRY

36 E SEVENTH ST STE 1510
CINCINNATI OH 45202
jkylercohn@bkllawfirm.com

NIPPC

CARL FINK
BLUE PLANET ENERGY LAW
LLC

628 SW CHESTNUT ST, STE
200
PORTLAND OR 97219
cmfink@blueplanetlaw.com

SPENCER GRAY
NIPPC

sgray@nippc.org

**OREGON CITIZENS UTILITY
BOARD**

WILLIAM GEHRKE (C)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97206
will@oregoncub.org

MICHAEL GOETZ (C)
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY STE 400
PORTLAND OR 97205
mike@oregoncub.org

Share OREGON CITIZENS'
UTILITY BOARD
OREGON CITIZENS' UTILITY
BOARD

610 SW BROADWAY, STE
400
PORTLAND OR 97205
dockets@oregoncub.org

PGE

PORTLAND GENERAL
ELECTRIC

pge.opuc.filings@pgn.com

KIM BURTON
PORTLAND GENERAL
ELECTRIC

121 SW SALMON STREET
PORTLAND OR 97204
kim.burton@pgn.com

JAY TINKER (C)
PORTLAND GENERAL
ELECTRIC

121 SW SALMON ST 1WTC-
0306
PORTLAND OR 97204
pge.opuc.filings@pgn.com

SBUA

JAMES BIRKELUND
SMALL BUSINESS UTILITY
ADVOCATES

548 MARKET ST STE 11200
SAN FRANCISCO CA 94104
james@utilityadvocates.org

DIANE HENKELS (C)
SMALL BUSINESS UTILITY
ADVOCATES

621 SW MORRISON ST. STE
1025
PORTLAND OR 97205
diane@utilityadvocates.org

STAFF

STEPHANIE S ANDRUS (C)
Oregon Department of Justice

BUSINESS ACTIVITIES
SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@doj.state.or.us

MATTHEW MULDOON (C)
PUBLIC UTILITY COMMISSION
OF OREGON

PO BOX 1088
SALEM OR 97308-1088
matt.muldoon@puc.oregon.gov

WALMART

VICKI M BALDWIN (C)
PARSONS BEHLE & LATIMER

201 S MAIN ST STE 1800
SALT LAKE CITY UT 84111
vbaldwin@parsonsbehle.com

**SERVICE LIST
OPUC DOCKET No. UM 2003**

KIM BURTON PORTLAND GENERAL ELECTRIC	121 SW SALMON STREET PORTLAND OR 97204 kim.burton@pgn.com
--	---

HEATHER COHEN PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 heather.b.cohen@puc.oregon.gov
---	--

KATHY ZARATE PUBLIC UTILITY COMMISSION OF OREGON	201 HIGH ST SE STE 100 SALEM OR 97301 kathy.zarate@puc.oregon.gov
--	---

AWEC

BRADLEY MULLINS MOUNTAIN WEST ANALYTICS	VIHILUOTO 15 KEPELE FI-90440 brmullins@mwanalytics.com
--	--

TYLER C PEPPLER DAVISON VAN CLEVE	1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com
--------------------------------------	--

GREENLOTS

THOMAS ASHLEY GREENLOTS	925 N. LA BREA AVE., 6TH FL LOS ANGELES CA 90038 tom@greenlots.com
----------------------------	---

**OREGON CITIZENS UTILITY
BOARD**

MICHAEL GOETZ OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY STE 400 PORTLAND OR 97205 mike@oregoncub.org
--	--

ROBERT JENKS OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
---	--

Share OREGON CITIZENS' UTILITY BOARD OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
--	--

PGE

PORTLAND GENERAL ELECTRIC	pge.opuc.filings@pgn.com
------------------------------	--------------------------

MEGAN STRATMAN
PORTLAND GENERAL
ELECTRIC

megan.stratman@pgn.com

STAFF

MITCH MOORE
PUBLIC UTILITY COMMISSION
OF OREGON

PO BOX 1088
SALEM OR 97308-1088
mitch.moore@puc.oregon.gov

ERIC SHIERMAN
PUBLIC UTILITY COMMISSION
OF OREGON

201 HIGH ST SE
SUITE 100
SALEM OR 97301
eric.shierman@puc.oregon.gov