



Portland General Electric Company
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February 11, 2021

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 335 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/np
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2003

IN THE MATTER OF
PORTLAND GENERAL ELECTRIC COMPANY
DEFERRAL OF COSTS AND REVENUES
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. 20-381, Portland General Electric Company (PGE) respectfully requests reauthorization to defer for later rate-making treatment costs associated with the two Electric Vehicle Charging Pilots (EV Charging Pilots or Pilots). PGE will seek amortization of the Deferred Amount in a future Commission proceeding. PGE requests this reauthorization be effective February 22, 2021 through February 21, 2022.

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. The Commission approved PGE's Pilot deferral applications for periods starting on February 22, 2019 and February 22, 2020 via Order No. 20-381 on October 27, 2020.

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 to customers for the installation of qualifying connected EV home chargers¹ as well as 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. Chargeway Beacons worked with three local dealerships to test the referral process and the Pilot's communication with customers. The launch resulted in 19 successful customer referrals for Pilot information. On January 4, 2021, PGE began efforts to market the Pilot to the entire residential segment. The pilot includes a network of electricians as a resource for customers, integration of the original equipment manufacturers with our demand response management system, and the start of calling demand

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

response events as part of the grid services. PGE is targeting Pilot enrollment of 1,000 additional customers by year end 2021.

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 will mitigate issues with cost, complexity, and effort that otherwise may preclude businesses from installing charging infrastructure. Through the pilot, PGE will support nonresidential customers' deployments of charging infrastructure and reduce 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 entails 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 11 qualified products, application checklist, online application, and Frequently Asked Questions.

II. 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 estimates to incur total O&M costs of approximately \$8.9 million over the fourteen-year period of the Residential EV Charging Program Pilot, as provided in Table 1 below. Residential EV charging 2020 expenses were significantly below the original forecast due to the delayed timing of various manufacturer integration costs now expected to be delivered in 2021.

Table 1: Residential EV Charging Pilot Expected Costs

In \$000s	Total	2019 Actual	2020 Actual	2021 Forecast	2022 Forecast	2023 Forecast	2024 Forecast	2025-2033 Forecast
Costs								
Administrative Costs	4,417	8	53	1,203	528	528	265	1,831
Incentives Paid	4,499	0	6	801	1,084	1,002	194	1,413
Total Costs	8,916	8	59	2,004	1,612	1,530	459	3,244

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 \$300,000 in 2021, as provided in Table 2 below.

Table 2: Business EV Charging Rebate Pilot Expected Costs

In \$000s	2019 Actual	2020 Actual	2021 Forecast	2022 Forecast	2023 Forecast	Total
Rebates			132	269	210	611

Education & Outreach			89	0	0	89
Administrative Costs	52	26	54	54	39	225
Evaluation			25	25	25	75
Total Costs	52	26	300	348	274	1,000

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 335 Service List, PGE’s last general rate case, and the UM 2003 Service List.

III. 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 for later rate-making treatment 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 22, 2021.

IV. Summary of Filing Conditions.

a. Earnings Review

The Deferred Amounts associated with the EV Charging Pilots will be subject to an earnings review in accordance with ORS 757.259(5).

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of the amortization request.

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.

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.

V. PGE Contacts

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

Application are:

Douglas C. Tingey
Associate General Counsel
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PGE-OPUC Filings
Rates & Regulatory Affairs
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Portland, OR 97204
Phone: 503.464.7805
E-mail: 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:

Alina Nestjorkina, Regulatory Analyst
E-mail: alina.nestjorkina@pgn.com

VI. 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 11th day of February 2021.

/s/ Jaki Ferchland

Jaki Ferchland,
Manager, Revenue Requirement
Portland General Electric Company
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 AND REVENUES
ASSOCIATED WITH EV CHARGING PILOTS

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

On February 11, 2021, 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 11, 2021.

Dated: February 11, 2021

/s/ Jaki Ferchland

Jaki Ferchland

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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 335 and UM 2003.

Dated at Portland, Oregon, this 11th day of February, 2021.

/s/ Jaki Ferchland

Jaki Ferchland

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