



Portland General Electric Company
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February 21, 2020

Via Electronic Filing

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

RE: UM 2003 PGE's Application for Reauthorization of Deferral of Costs and Revenues 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 and Revenues 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 1811 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7805.

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

Sincerely,

A handwritten signature in black ink that reads "Jaki Ferchland". The signature is written in a cursive, flowing style.

Jaki Ferchland
Manager, Revenue Requirement

np/JF
Enclosure
cc: Service Lists: UE 335 and UM 1811

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

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs and Revenues Associated with PGE’s Electric Vehicle Charging Pilots

Application for Reauthorization of Deferral of Costs and Revenues Associated with PGE’s Electric Vehicle Charging Pilots

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (PGE) hereby respectfully requests reauthorization to defer for later rate-making treatment incremental operation and maintenance (O&M) costs associated with the two Electric Vehicle Charging Pilots (EV Charging Pilots or Pilots) proposed with PGE’s initial and amended deferral application (Deferred Amount) and subject to PGE’s supplemental filing dated February 21, 2020. PGE will seek amortization of the Deferred Amount in a future Commission proceeding. If approved, this reauthorization will be effective February 22, 2020 through February 21, 2021.

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.

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 will explore 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 will provide incentives to customers for the installation of qualifying connected EV home chargers¹ as well as annual performance incentives for participation in grid services.

For more details about the Residential EV Charging Pilot please see Section 2 of PGE's EV Charging Pilot Proposals, provided as Attachment A to PGE's amended deferral application filed on February 22, 2019.

Business EV Charging Pilot

PGE's Business EV Charging Pilot is expected 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 Pilot aims to 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. PGE is currently modifying the Business EV Charging program pilot design to reflect the amended stipulation adopted by Commission Order No. 19-385 in Docket No. UM 1811. The amended stipulation states that:

"PGE agrees to propose a workplace charging and/or fleet charging program within one-year of the date of the Stipulation, conditioned on Commission approval of the Stipulation. The approximate

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

total cost of the proposal to be charged to customers will be \$1M (only nominal O&M costs will be charged to customers in this proposal). The program shall be open to both cost-of-service and direct access customers. The proposed \$1M results from a removal of \$1M from the PGE's proposed Education and Outreach budget in its application. PGE will also separately consider developing programs to increase access to electricity as a transportation fuel at multifamily dwellings.” (Order 19-385 at 3.)

On February 22, 2019, PGE filed an amended application for deferral of net benefits or costs associated with the Residential and the Business EV Charging Pilots. Pursuant to communications with OPUC Staff, PGE supplemented its initial deferral application on February 21, 2020, proposing several modifications to our initial filing. PGE is currently awaiting Commission action on its initial application. Consequently, PGE has an unresolved initial deferral application and requests reauthorization for the subsequent deferral period.

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

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

PGE estimates to incur total O&M costs of approximately \$9.1 million over the fourteen-year period of the Residential EV Charging Program Pilot, as provided in Table 1 below. The estimated nominal cost amount for the first year of the Residential EV Charging Pilot is \$1.3 million.

Table 1: Residential EV Charging Pilot Expected Costs

EV RESIDENTIAL COST SUMMARY		Total Nominal					
(Excl. Capital Carrying Costs)	\$000s	Year 1	Year 2	Year 3	Year 4	Year 5	Years 6-14
Costs							
Administrative Costs	5,154	900	902	887	755	202	1,508
Incentives Paid	3,985	418	657	829	310	116	1,654
Total Costs	9,139	1,318	1,559	1,716	1,065	319	3,162

The total cost of the Business EV Charging Pilot is capped at \$1 million pursuant to Commission Order No. 19-385. PGE expects to incur O&M costs of approximately \$0.2 million over the next 12 months, as provided in Table 2 below.

Table 2: Business EV Charging Pilot Expected Costs

EV BUSINESS COST SUMMARY		March 2020 - February 2021
(Excl. Capital Carrying Costs)		
Costs		
Rebates		61,000
Education & Outreach		88,000
Labor Resources		75,000
Evaluation		15,000
Total Costs		239,000

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, 2020.

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.

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 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:

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Rates & Regulatory Affairs
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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 Cristea, Sr. Regulatory Analyst
E-mail: stefan.cristea@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 21st day of February 2020.



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Attachment A

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

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

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Costs and Revenues Associated with PGE's Electric Vehicle Charging Pilots

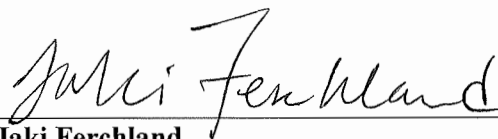
Notice of Application for Reauthorization of Deferral of Costs and Revenues Associated with PGE's Electric Vehicle Charging Pilots

On February 21, 2020, 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 and revenues 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, 2020.

Dated: February 21, 2020



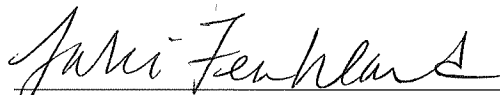
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Reauthorization of Deferral of Costs and Revenues 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 1811.

Dated at Portland, Oregon, this 21st day of February, 2020.



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