



Oregon

Kate Brown, Governor

Public Utility Commission

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June 18, 2019



BY EMAIL

Karla Wenzel

Portland General Electric Company

pge.opuc.filings@state.or.us

RE: Advice No. 19-13

At the public meeting on June 18, 2019, the Commission adopted Staff's recommendation in this matter docketed as ADV 977. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 18, 2019

REGULAR CONSENT EFFECTIVE DATE June 19, 2019

DATE: June 10, 2019

TO: Public Utility Commission

FROM: Sabrina Soldavini and George Compton

THROUGH: Jason Eisdorfer, John Crider, and Marianne Gardner **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC: (Docket ADV No. 977/Advice No. 19-13) Updates Schedule 6, Residential Pricing Pilot.

STAFF RECOMMENDATION:

Approve Portland General Electric's (PGE or Company) Advice No. 19-13, proposed updates to Schedule 6 Residential Pricing Pilot, effective for service on and after June 19, 2019, on less than statutory notice.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve PGE's request to update its Schedule 6 Residential Pricing Pilot, on less than statutory notice (LSN).

Applicable Law

ORS 757.205(1) states that a public utility must file schedules showing all rates, tolls, and charges for service that have been established and are in force at the time.

OAR 860-022-0025 requires that new tariff filings include statements showing the new rates, the number of customers affected, the impact on annual revenue, and the reasons supporting the proposed tariff.

Filings that make any change in rates, tolls, charges, rules or regulations must be filed with the Commission at least 30 days before the effective date of the changes.

ORS 757.220. The Commission may approve tariff changes on less than 30 days' notice for good cause shown. *Id.*

The Commission reviews tariffs filed under ORS 757.205 and 757.210 to determine whether they are fair, just and reasonable.

Analysis

Background

Portland General Electric submitted this advice filing to the Commission on June 5, 2019, pursuant to ORS 757.205, ORS 757.210, and OAR 860-022-0025, with a requested effective date of June 19, 2019. With its filing, the Company proposes revisions to Schedule 6 Residential Pricing Pilot, requesting an extension of the program, and incorporating recent changes related to PGE's Flexible Residential Pricing Program.¹ Due to the timing of the filing, an LSN was included with the filing.

Extension of Flex 1.0 Program

As referenced above, the Company's filing proposes the extension and modification of its Schedule 6 Residential Pricing Pilot, also referred to as Flex 1.0. Flex 1.0 is a demand response program designed to test several Time of Use (TOU) and Time of Day (TOD) rates, both with and without Peak Time Rebates (PTR). This program, offered through Schedule 6, is currently set to expire on June 30, 2019.

On February 8, 2019, the Company submitted Advice No. 19-03. Its intent was to incorporate as part of the standard Residential Service Schedule 7, a) a PTR option, and b) a Flex 2.0 two-tier TOU option piloted in the Schedule 6 Flex 1.0 program. The Company states that its goal was to have its Flex 2.0 program in effect before the termination of Schedule 6, enabling customers currently enrolled in Flex 1.0 to more seamlessly transition to Schedule 7, minimizing potential rate changes, and preserving the option to remain on a TOU/TOD plan. However, the Company is continuing its work with Staff to refine the TOU/TOD aspect of its Flex 2.0 program. As such, in this advice filing the Company proposes to extend Schedule 6/Flex 1.0 Pilot until September 30, 2019, allowing time before its termination for the Company's new Schedule 7 TOU/TOD program to be rolled out.

Staff supports this extension as it ensures customers currently enrolled in the Schedule 6 pilot (approximately 34,000 customers) are not abruptly switched away from a TOU/TOD option before the full Schedule 7 Flex 2.0 program is implemented, and eliminates the possibility of customers being forced to change schedules prematurely, only to have their rates potentially change again once the new Schedule 7 offerings are put into place this fall.

¹ See Docket No. ADV 920, Advice No. 19-03, Staff Report for Public Meeting.

Peak Time Rebate Addition & Mirroring Language

In addition to extending the length of the residential pricing pilot program, this filing proposes to mirror within Schedule 6 the recently approved incorporation of the PTR program in Schedule 7. The change modifies the PTR incentive level and adds a PTR Window in the mornings from 7-11 AM. The Company notes in its filing that it is proposing the inclusion of the PTR incentive alignment to avoid any customer confusion and “perceived inequities, given that PTR events are going to be called for Schedule 6 and Schedule 7 customers.”

Staff has reviewed the changes to Schedule 6, and supports the modifications to mirror Schedule 7 PTR language, and agrees with the Company’s assessment that the alignment of PTR incentive levels helps resolve concerns about inequities between customers on the two Schedules.

Effects of Filing

PGE’s proposed modifications to Schedule 6 do not change existing rates, and thus will not affect the Company’s revenue. Staff finds that the 33,800 customers currently enrolled in Schedule 6, Residential Pricing Pilot will not be harmed by the extension of, or modifications to, the Flex 1.0 program.

Conclusion

Based on Staff’s analysis of PGE’s advice filing, Staff finds the proposed changes result in rates that are fair, just and reasonable. Staff recommends the Commission approve PGE’s application on less than statutory notice.

PROPOSED COMMISSION MOTION:

Approve PGE’s application to update Schedule 6, Residential Pricing Pilot subject to service on and after June 19, 2019, on less than statutory notice.

**SCHEDULE 6
RESIDENTIAL PRICING PILOT
(NO NEW SERVICE)**

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PURPOSE

This residential pricing pilot is a demand response option for eligible residential Customers. The pricing pilot is designed to test several time of use options and peak time rebates. The Company will provide advance notice to participating Customers for peak time rebate events. The pilot is expected to be active through September 30, 2019.

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DEFINITIONS

Event Notification – the Company will issue a notification of a Peak Time Rebate event (as described in the Peak Time Rebate Event section of this tariff) to participating Customers the day prior to the Peak Time Rebate event. Participating Customers must choose at least one method for receipt of notification. Available notification methods include email, text, or other available option. The Company will not call PTR events for more than two consecutive days. The Company will call PTR events only in Event Seasons. Prior to each Event Season, the Company will remind the enrolled Customers that they are on the pilot, the Customer's pricing option, that they may participate in Peak Time Rebate events (if applicable), and ways to be successful on the pilot.

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Event Season – the pilot has two event seasons: the Summer Event Season and the Winter Event Season.

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Holiday – the following are holidays for purposes of the pilot: New Year's Day (January 1), Memorial Day (last Monday in May), Independence Day (July 4), Labor Day (first Monday in September), Thanksgiving Day (fourth Thursday in November), and Christmas Day (December 25). If a holiday falls on a Saturday, the preceding Friday will be designated the holiday. If a holiday falls on a Sunday, the following Monday will be designated the holiday.

Peak Time Rebate (PTR) Program – customers choosing the PTR program are eligible to receive a rebate by reducing Energy use during Company-called events, relative to each Customer's baseline Energy use, as determined by the Company.

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Summer Event Season – the summer event season includes the successive calendar months June through September.

Winter Event Season – the winter event season includes the successive calendar months December through February.

AVAILABLE

In all territory served by the Company.

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SCHEDULE 6 (Continued)

APPLICABLE

Subject to selection by the Company, eligible Residential (Schedule 7) Customers may elect to participate in the pilot as described in the Enrollment section of this tariff. The Company will select the pricing option under Monthly Rate. Eligible Customers must have a Network Meter. See the Special Conditions section for a list of relevant eligibility criteria. Customers participating in the pricing pilot will be transferred from Schedule 7 to Schedule 6 for the duration of the pilot.

MONTHLY RATE

The sum of the following charges per Service Point (SP)* will apply to Customers participating in the pricing pilot:

<u>Basic Charge</u>	\$11.00	
<u>Transmission and Related Services Charge</u>	0.243	¢ per kWh
<u>Distribution Charge</u>	4.662	¢ per kWh
<u>Energy Charge</u>		

See options that follow. The Company will choose the Energy price option for each Customer.

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* See Schedule 100 for applicable adjustments.

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Advice No. 19-13
Issued June 5, 2019
James F. Lobdell, Senior Vice President

Filing Center
06/05/2019

Effective for service
on and after June 19, 2019

SCHEDULE 6 (Continued)

MONTHLY RATE (Continued)

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Day/Night Time of Use

Energy Charge

Off-Peak Period	3.923	¢ per kWh
On-Peak Period	10.023	¢ per kWh
First 1,000 kWh block adjustment	(0.722)	¢ per kWh

All Year Long

	AM												PM										
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11
Standard Day Mon. - Fri.	Off Peak						On Peak															Off Peak	
Saturdays, Sundays, and Holidays	Off Peak																						

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SCHEDULE 6 (Continued)

MONTHLY RATE (Continued)

Day/Night Time of Use with PTR

Energy Charge

Off-Peak Period	3.923	¢ per kWh
On-Peak Period	10.023	¢ per kWh
First 1,000 kWh block adjustment	(0.722)	¢ per kWh
 PTR Credit	 100.00	 ¢ per kWh

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Summer Hours (May 1 – October 31)

	AM												PM											
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	
Standard Day Mon. - Fri.	Off Peak						On Peak												Off Peak					
Day with PTR (when called*)	Off Peak						Off	PTR Window 2-4 Hours				On Peak				PTR Window 2-5 Hours				On Peak	Off Peak			
Saturdays, Sundays, and Holidays	Off Peak																							

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Winter Hours (November 1 – April 30)

	AM												PM											
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	
Standard Day Mon. - Fri.	Off Peak						On Peak												Off Peak					
Day with PTR (when called*)	PM	Off Peak						On Peak						PTR Window 2-5 Hours				On Peak	Off Peak					
	-or-																							
	AM	Off Peak						Off	PTR Window 2-4 Hours				On Peak								Off Peak			
Saturdays, Sundays, and Holidays	Off Peak																							

* The Company will call Peak Time Rebate events only in Event Seasons. Events will not be called on Holidays. Customers pay Energy Charges based on a standard day, but are also eligible for a Peak Time Rebate.

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SCHEDULE 6 (Continued)

MONTHLY RATE (Continued)

Two Period Time of Use with Peak Time Rebate

Energy Charge

Off-Peak Period	4.750	¢ per kWh
On-Peak Period	14.050	¢ per kWh
First 1,000 kWh block adjustment	(0.722)	¢ per kWh
 PTR Credit	 100.00	 ¢ per kWh

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Summer Hours (May 1 – October 31)

	AM											PM											
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11
Standard Day Mon. - Fri.	Off Peak											On Peak					Off Peak						
Day with PTR (when called)	Off Peak					PTR Window 2-4 Hours			Off Peak			PTR Window 2-5 Hours					Off Peak						
Saturdays, Sundays, and Holidays	Off Peak																						

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Winter Hours (November 1 – April 30)

	AM											PM											
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11
Standard Day Mon. - Fri.	Off Peak					On Peak			Off Peak			On Peak					Off Peak						
Day with PTR (when called*)	PM	Off Peak					On Peak			Off Peak			PTR Window 2-5 Hours					Off Peak					
	-or-																						
	AM	Off Peak					PTR Window 2-4 Hours			Off Peak			On Peak					Off Peak					
Saturdays, Sundays, and Holidays	Off Peak																						

* The Company will call Peak Time Rebate events only in Event Seasons. Events will not be called on Holidays. Customers pay Energy Charges based on a standard day, but are also eligible for a Peak Time Rebate.

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Advice No. 19-13
Issued June 5, 2019

James F. Lobdell, Senior Vice President

Effective for service
on and after June 19, 2019

SCHEDULE 6 (Continued)

MONTHLY RATE (Continued)

Three Period Time of Use with Peak Time Rebate

Energy Charge

Off-Peak Period	3.313	¢ per kWh
Mid-Peak Period	8.313	¢ per kWh
On-Peak Period	14.413	¢ per kWh
First 1,000 kWh block adjustment	(0.722)	¢ per kWh
 PTR Credit	 100.00	 ¢ per kWh

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Summer Hours (May 1 – October 31)

	AM											PM											
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11
Standard Day Mon. - Fri.	Off Peak											Mid Peak	On Peak					Mid Peak	Off Peak				
Day with PTR (when called*)	Off Peak						PTR Window 2-4 Hours					Mid Peak	PTR Window 2-5 Hours					Mid Peak	Off Peak				
Saturdays, Sundays, and Holidays	Off Peak																						

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Winter Hours (November 1 – April 30)

	AM											PM											
	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11
Standard Day Mon. - Fri.	Off Peak						On Peak					Mid Peak	On Peak					Mid Peak	Off Peak				
Day with PTR (when called*)	PM	Off Peak						On Peak					Mid Peak	PTR Window 2-5 Hours					Mid Peak	Off Peak			
	-or-																						
	AM	Off Peak						PTR Window 2-4 Hours					Mid Peak	On Peak					Mid Peak	Off Peak			
Saturdays, Sundays, and Holidays	Off Peak																						

* The Company will call Peak Time Rebate events only in Event Seasons. Events will not be called on Holidays. Customers pay Energy Charges based on a standard day, but are also eligible for a Peak Time Rebate.

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SCHEDULE 6 (Continued)

PEAK TIME REBATE EVENT

Days in which the Company calls a Peak Time Rebate event during Event Seasons consist of standard day hours and pricing for Energy Charges. In addition, the Customer has the opportunity to reduce Energy use for two to five consecutive hours during the designated hours under Monthly Rate that the Company has declared a Peak Time Rebate event. The Company initiates Peak Time Rebate events with Event Notification. The Company will call Peak Time Rebate events only in the two Event Seasons: Summer Event Season and Winter Event Season. Peak Time Rebate events will not be called on weekends or Holidays. The Company may call a Peak Time Rebate event in the morning hours or the evening hours, but not both. Peak Time Rebate events will not be declared by the Company for more than two consecutive days. Reasons for calling events may include, but are not limited to: Energy load forecasted to be in the top 1% of annual load hours, forecasted temperature above 90 or below 32, expected high generation heat rates and market power prices, and/or forecasted low or transitioning wind generation.

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ENROLLMENT

Enrollment in this pilot is closed to new service. Unless this pilot is otherwise terminated, participating Customers will be enrolled for the entire pilot term.

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ADJUSTMENTS

Service under this schedule is subject to the same adjustments approved by the Commission for Schedule 7. Applicable adjustment schedules are summarized in Schedule 100.

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SCHEDULE 6 (Concluded)

SPECIAL CONDITIONS

1. The Customer may terminate service under this pilot at the next regularly scheduled meter reading if the Customer provides the Company two weeks notice prior to the next regularly scheduled meter read date.
2. If a Customer is removed from the pilot, the Customer is not eligible to re-enroll during the pilot period.
3. A Customer's election to participate in this pilot is based solely on the Customer's own analysis of the benefits of this schedule. The Company does not assure that participation in the pilot will result in reductions in the Customer's bill or that it will not increase costs to the Customer compared to other service options. For the pilot's first year, the Company will compare each Customer's bill to the bill they would have had under Schedule 7 standard blocked rates. If the Customer was billed for at least 10% more than they would have been billed under Schedule 7 standard blocked rates, the Company will refund the amount the Customer was billed that are in excess of 10% over that they would have been billed under Schedule 7 standard blocked rates by bill credit or a refund check.
4. The Company will defer and seek recovery of all pilot costs not otherwise included in rates, including the refunds from Special Condition 3.
5. The Company will update prices when Schedule 7 prices are updated, subject to Commission approval.
6. Customers enrolled in Time of Use under Schedule 7, Schedule 5 Direct Load Control Pilot Rider, Solar Payment Option, Net Metering, or Employee Discount are not eligible to participate in the pricing pilot. Customers must be eligible for Schedule 102 Regional Power Act Exchange Credit to be eligible to participate in the pricing pilot.

TERM

This pilot is active until September 30, 2019.

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Advice No. 19-13
Issued June 5, 2019
James F. Lobdell, Senior Vice President

Filing Center
06/05/2019

Effective for service
on and after June 19, 2019

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF <u>Portland General Electric Company</u> (UTILITY COMPANY))))))	UTILITY L.S.N. APPLICATION NO. <u>2240</u> (LEAVE BLANK)
TO WAIVE STATUTORY NOTICE.		

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
 Due to the requested effective date and the less than 30-day notice, PGE is also submitting an application requesting a waiver of legal statutory notice, pursuant to ORS 757.220 and OAR 860-022-0020. PGE has conferred with Staff on our need given the effective date.

The purpose of this filing is to: 1) update the term in Schedule 6 to continue the pilot through September 30, 2019 and make clear that the pilot is closed to new enrollments during this extension; 2) update the PTR program language and incentive levels to mirror approved changes to Schedule 7; and 3) remove the Standard Block with PTR option as these customers have already been transitioned to Schedule 7.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)

- First Revision of Sheet No. 6-1
- Fifth Revision of Sheet No. 6-2
- Third Revision of Sheet No. 6-3
- Third Revision of Sheet No. 6-4
- Third Revision of Sheet No. 6-6
- Third Revision of Sheet No. 6-8
- Original Sheet No. 6-9
- First Revision of Sheet No. 6-10

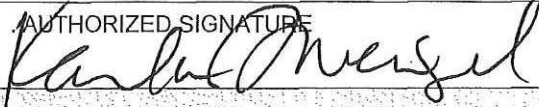
3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)

- Second Revision of Sheet No. 6-1
- Sixth Revision of Sheet No. 6-2
- Fourth Revision of Sheet No. 6-3
- Fourth Revision of Sheet No. 6-4
- Fourth Revision of Sheet No. 6-6
- Fourth Revision of Sheet No. 6-8
- First Revision of Sheet No. 6-9
- Second Revision of Sheet No. 6-10

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

A Waiver of Statutory Notice is requested due to the requested effective date of June 19, 2019

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): June 19, 2019

AUTHORIZED SIGNATURE 	TITLE Manager, Pricing & Tariffs	DATE June 5, 2019
PUC USE ONLY		
<input checked="" type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE <p style="text-align: center; color: blue; font-size: 1.2em;">6-19-19</p>	

AUTHORIZED SIGNATURE



DATE

6/18/19

PUC FORM FM260 (2-2015)