

June 5, 2019

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

RE: Advice No. 19-13, Schedule 6 Residential Pricing Pilot Update

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rule (OAR) 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **June 19, 2019**:

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

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.

This residential pricing pilot (also known as Flex 1.0) is a demand response option for eligible Residential Customers. The pricing pilot was designed to test several time of use (TOU or TOD) options with and without peak time rebates (PTRs), standard block prices with PTRs, and behavioral demand response by sending notification of events without an associated PTR. As originally designed, the TOU options include a simple day/night option, two period TOU, and three period TOU.

On February 8, 2019, PGE filed a tariff update to Schedule 7 Residential Service to implement Flex 2.0, the Flexible Residential Pricing Program, build on the Cadmus evaluation findings and recommendations. In moving from pilot to program, the intention of the filing was to provide two pricing options that were piloted on Schedule 6 (PTR and a two-tier TOU with PTR). In addition, PGE had planned for the Schedule 7 update to be effective prior to the Schedule 6 pilot term's expiration so that Schedule 6 customers would have a seamless experience when they transitioned to Schedule 7 to

either the new TOU rate or the Standard Block Rate, at the pilot's close. However, in response to PGE's proposed Schedule 7 updated TOU pricing, Staff raised questions and so PGE withdrew the TOU pricing to allow more time to address Staff's concerns.

PGE did not anticipate the amount of time that would be required to work through the TOU issues and Schedule 6's original termination date is coming near. To continue the intent of a seamless customer experience from Schedule 6 to 7 when the pilot ends, we make this filing. 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.

Term extension

PGE is extending the term of this pilot to offer a seamless transition for existing Schedule 6 customers to the new TOD rate, which is currently being developed with Staff input. Currently, there are only participants on TOU in Schedule 6; the Standard Block with PTR participants have been transitioned to the same option on Schedule 7. PGE did not want to move Schedule 6 TOU customers prematurely to Schedule 7 to either a) be on a TOU rate which would likely change and therefore the customer would experience two rate changes in three months; or b) be on the Standard Block Rate and less likely to then move to the new TOD rate when it rolls out in Fall 2019. Therefore, PGE is extending the term for the Schedule 6 pilot until the revised TOD rate rolls out. At that time, Customers who are on Schedule 6 and do not wish to move to the new TOD will be put on the Standard Block Rate (Residential Service Price Plan).

Mirroring language—Schedule 6 and Schedule 7

In addition to updating the pilot term, PGE is aligning the PTR language to match recently approved changes to Schedule 7. As part of PGE Advice No. 19-03, the Commission approved the PTR program in Schedule 7. PGE is updating Schedule 6 so that it mirrors the approved program including a change to the incentive level and adding a PTR Window in the mornings from 7-11 AM. Regarding the change in PTR incentive level, PGE is concerned about customer confusion and perceived inequities, given that PTR events are going to be called for Schedule 6 and Schedule 7 customers. In addition, there is potential for administrative confusion and burden to manage different incentive levels depending on whether a participating customer is on Schedule 6 or Schedule 7. Thus, this filing aligns them.

PGE Advice No. 19-13 Page 3

To satisfy the requirements of OAR 860-022-0025, PGE provides the following response:

The proposed revisions to Schedule 6, Residential Pricing Pilot, do not increase, decrease, otherwise change existing prices, or impact revenues. PGE has approximately 33,800 customers who choose to participate under this schedule. Should you have any questions or comments regarding this filing, please contact Kalia Savage at (503) 464-7432.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

Karla Wenzel

Manager, Pricing and Tariffs

Enclosures

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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<u>Event Season</u> – the pilot has two event seasons: the Summer Event Season and the Winter Event Season.

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<u>Holiday</u> – 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.

<u>Peak Time Rebate (PTR) Program</u> – 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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<u>Summer Event Season</u> – the summer event season includes the successive calendar months June through September.

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

AVAILABLE

In all territory served by the Company.

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:

Basic Charge	\$11.00

<u>Transmission and Related Services Charge</u> 0.243 ¢ per kWh

<u>Distribution Charge</u> 4.662 ¢ per kWh

Energy Charge

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.

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

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MONTHLY RATE (Continued)

Day/Night Time of Use with PTR

Energy Charge

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

PTR Credit 100.00 ¢ per kWh (C)

Summer Hours (May 1 – October 31)

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^{*} 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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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

Summer Hours (May 1 – October 31)

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Day with PTR (when called*)	-or-						
(when called)	AM	Off Peak	PTR Window 2-4 Hours	Off Peak	On Peak	Off Peak	
Saturdays, Sundays, Off Peak and Holidays							

^{*} 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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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 $100.00 ext{ } extit{$\phi$ per kWh}$ (C)

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(when called*)	-or-												
(when called)	AM	Off Peak	PTR Window 2-4 Hours	Mid Peak	On Peak	Mid Peak	Off Peak						
Saturdays, Sun and Holidays	days,	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.

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.

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.

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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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

BEFORE THE PUBLIC UTILITY	COMMISSION OF OREGON	1
IN THE MATTER OF THE APPLICATION OF) UTILITY L.S.N. APPLICATION	
Portland General Electric Company) NO.	
(UTILITY COMPANY)) (LEAVE BLANK)	
TO WAIVE STATUTORY NOTICE.)	
NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.		
1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(STALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL Due to the requested effective date and the less than 30-day waiver of legal statutory notice, pursuant to ORS 757.220 at need given the effective date. The purpose of this filing is to: 1) update the term in Schedumake clear that the pilot is closed to new enrollments during incentive levels to mirror approved changes to Schedule 7; customers have already been transitioned to Schedule 7.	RULES AND REGULATIONS AFFECTING of notice, PGE is also submitting an applied OAR 860-022-0020. PGE has conferned to continue the pilot through Septem this extension; 2) update the PTR progr	rHE SAME) cation requesting a red with Staff on our aber 30, 2019 and am language and
2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOV 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	V ON FILE KNOWN AND DESIGNATED AS:	(INSERT SCHEDULE
3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (I 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	NSERT SCHEDULE REFERENCE BY NUME	BER, PAGE AND ITEM)
4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NAME A Waiver of Statutory Notice is requested due to the request		
5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S	r) OR CHANGE(S): June 19, 2019	
ANTHORIZED SIGNATURE	TITLE	DATE

Manager, Pricing & Tariffs

EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE

PUC USE ONLY

☐ APPROVED

☐ DENIED

June 5, 2019

AUTHORIZED SIGNATURE	DATE

PUC FORM FM260 (2-2015)