



Portland General Electric Company
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January 10, 2023

Via Email

Public Utility Commission of Oregon
201 High Street SE, Suite 100
PO Box 1088
Salem, OR 97308-1088

Re: UM 2033 – Portland General Electric Company’s Transportation Electrification Plan (TEP)

Dear Filing Center:

Enclosed for filing in the above referenced docket is Portland General Electric Company’s motion requesting extension of TEP filing deadline waiver granted in Commission Order No. 21-484.

Sincerely,

A handwritten signature in blue ink that reads "Brendan J. McCarthy". The signature is written in a cursive style.

Brendan J. McCarthy
Assistant General Counsel

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2033

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Transportation Electrification Plan.

**PGE’S MOTION REQUESTING
EXTENSION OF FILING
DEADLINE WAIVER GRANTED IN
COMMISSION ORDER NO. 21-484**

I. INTRODUCTION

Portland General Electric Company (PGE or the Company) respectfully requests an extension of the Transportation Electrification (TE) Plan filing deadline waiver previously granted by the Public Utility Commission of Oregon (Commission or OPUC) in Order No. 21-484.¹

The Commission accepted PGE’s most recently filed TE Plan on February 14, 2020. Commission Staff (Staff) expressed to PGE that the waiver in Order No. 21-484 provides utilities with up to twelve additional months’ time to prepare their plans, from the original filing deadline under the previous Oregon Administrative Rule (OAR) Chapter 860, Division 87. Thus, PGE believes that Order No. 21-484 results in a new deadline for PGE of February 14, 2023 for filing of our three-year TE plan. The Commission granted the waiver in Order No. 21-484 to allow completion of rulemaking to revise the Division 87 rules, so utilities could file their next plans in compliance with the new rules. The Commission subsequently adopted revised rules with Order No. 22-336 on September 8, 2022.²

Notwithstanding the February deadline, PGE asks the Commission to exercise its discretion provided in revised OAR 860-087-0001(2) and 860-087-0020(2)(b)³ and set a new filing deadline

¹ OPUC Order No. 21-484, available online at <https://apps.puc.state.or.us/orders/2021ords/21-484.pdf>

² OPUC Order No. 22-386, available online at <https://apps.puc.state.or.us/orders/2022ords/22-336.pdf>

³ OAR Chapter 860, Division 87, available online at

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=4089>. OAR 860-087-0001(2) states the Commission’s authority to waive any of the rules in this division for good cause shown in response to a written request. OAR 860-087-0020(2)(b) states that “An electric company must present a draft TE Plan...on or before May 1, every three years starting in the year 2025, or as otherwise directed by the Commission.”

of on or before June 1, 2023, for PGE to present a draft of its next full TE Plan for Staff and stakeholder review and comment. In addition, PGE asks that the Commission grant a one-time waiver, for 2023, of the requirement under OAR 860-087-0030(1) that the Company must file a TE Plan Report on or before May 1.

With these waiver requests and delay, PGE aims to provide Staff and stakeholders access to PGE's Integrated Resource and Clean Energy Plans (IRP and CEP) to contribute to their evaluation of the impact on customers of the Company's TE Plan in the context of the broader Company effort to reduce economy-wide greenhouse gas emissions. This will also allow time for the Company to ensure the TE Plan is effectively coordinated with recently emerged federal funding opportunities for both PGE and entities with whom the Company may partner on specific TE-related activities.

II. SUPPORT FOR REQUEST

PGE has been working diligently to prepare a new TE Plan. The Company actively engaged in the UM 2165 investigation into a TE investment framework and the AR 654, Division 87 rulemaking process. At the same time, PGE mapped out a significant expansion of the range and scope of its activities in support of TE, as required by HB 2165 and consistent with the State of Oregon's TE and greenhouse gas emissions goals. As part of this planning effort, the Company held a series of five stakeholder workshops to share concepts and solicit feedback on its proposed TE portfolio and conducted a preliminary needs assessment to help guide ongoing engagement with and investment in underserved communities.

We believe this work provides a clear sense of the appropriate role for PGE in supporting its customers' transition to electric transportation options, and we crafted our draft TE Plan in a manner that reflects feedback received in the workshops held with stakeholders, especially with regards to scope and customer price impact. However, as we prepared to present a draft TE Plan, PGE heard strong interest in understanding how the Company plans to coordinate the IRP, CEP and TE Plan along with estimations of the combined cost and customer price impact. A June 1, 2023 filing deadline date would give PGE time to complete that coordinated planning effort and stakeholders time to gain an understanding of the IRP and CEP before the TE Plan is reviewed.

As indicated in previous discussions with Staff and stakeholders, the Company intends to include program years 2023, 2024 and 2025 in its next TE Plan. Given that our proposed filing date

would not result in plan acceptance or budget approval before the second half of 2023, however, we acknowledge this presents a potential conflict in the first year of the plan with the Company's responsibility to expend certain funds collected through the TE Monthly Meter Charge (MMC), as well as our ongoing responsibility to distribute funds collected on customers' behalf through the Clean Fuels Program (CFP). In addition, we are keenly aware that market interest in TE-related activity is building rapidly, with a resulting desire to see utilities such as PGE step up to ensure adequate TE programs and infrastructure are in place to meet EV charging needs in the near future.

To resolve this potential conflict, PGE proposes to file a single-year 2023 TE budget and program summary in the first quarter of the year, prior to filing the full TE Plan by June 1. At the direction of the Commission, this interim filing could take the form of a TE Plan update, as provided for in the Division 87 rules, and would focus on the proposed budget for expenditures of 2023 MMC revenues. We would also share information about planned expenditures of CFP funds for 2023. The Company would provide sufficient information in this interim filing to allow prompt Staff and stakeholder review and Commission action. Joined with already-approved TE-related programs and activities, this would allow PGE to continue its support for customer adoption of TE in 2023 while laying the groundwork for implementation of the full, three-year TE Plan once the Commission has reviewed and accepted it.

PGE has discussed these matters with Commission Staff, as well as representatives of the Citizens' Utility Board, the Northwest Energy Coalition, and the Green Energy Institute at Lewis & Clark College. Those parties have indicated they do not oppose the request for extension. In addition, as part of this filing, notice will be provided to the service lists for UM 1811 and UM 2033.

Lastly, the Company believes discussion and reporting of the Company's prior and current TE-related activity and results that will be included with the draft TE Plan PGE must present on or before June 1, if this waiver request is granted, would render the separate TE Plan Report required by May 1 under Division 87 redundant for 2023. In future TE Plan filing years, the Company understands it must file a separate TE Plan Report on activity completed under the Company's prior three-year TE Plan, notably including a report on expenditures in the format of the approved budget and a discussion of how the plan met the performance area categories described in the Division 87 rules. For 2023, however, the Company's prior TE Plan, filed in 2019, complies with the previous rules and does not entirely comport with the requirements of the new rules, particularly with respect to the budget and performance area categories. We anticipate that the discussion of prior and current

activities and results in the June 1, 2023 TE Plan filing would, however, be sufficient to allow the Commission to satisfy its oversight responsibilities and presumably help inform the Commission's decision on acceptance of the new three-year plan and approval of the proposed budget and program applications.

PGE remains fully committed to providing the comprehensive, portfolio-level TE planning and reporting content envisioned in the UM 2165 and AR 654 processes, to allow Staff and stakeholders and the Commission to evaluate and provide feedback and guidance on the Company's activities in support of TE. We believe the Commission's approval of this waiver request would be consistent with the intent of the new Division 87 rules. The waiver would allow the Company to meet both near and long term planning objectives while providing critical context for evaluation of our next TE Plan within our larger resource planning environment.

Absent Commission action to grant this waiver, PGE will present a new draft TE Plan to Staff and stakeholders by February 14, 2023. The Company will do this with the awareness that parties may have difficulty recommending changes to or endorsing PGE's proposals without the benefit of context and potential customer price impact provided by the upcoming IRP and CEP filings.

III. CONCLUSION

For the reasons stated above, should the Commission deem it appropriate, PGE respectfully requests that the Commission issue an Order extending its prior waiver of PGE's TE Plan filing deadline and waiving the 2023 TE Plan Report requirement.

Dated the 10th day of January, 2023.



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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused Portland General Electric's Motion Requesting Extension of Filing Deadline Waiver Granted in Commission Order No. 21-484 to be served by electronic mail to the following parties in OPUC Docket No. UM 2033 and UM 1811:

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Dated at Portland, Oregon, this 10th day of January, 2023.

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