

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: February 25, 2020**

**REGULAR** \_\_\_\_\_ **CONSENT**  X  **EFFECTIVE DATE**  March 1, 2020

**DATE:** February 18, 2020

**TO:** Public Utility Commission

**FROM:** Eric Shierman

**THROUGH:** Michael Dougherty and JP Batmale **SIGNED**

**SUBJECT:** PORTLAND GENERAL ELECTRIC:  
(Docket No. ADV 1081/Advice No. 20-01)  
Request to establish Schedule 16.

**STAFF RECOMMENDATION:**

The Oregon Public Utility Commission (Commission or OPUC) should approve Portland General Electric's (PGE or Company) Advice No. 20-01 with an expiration date of December 15, 2020.

**DISCUSSION:**

Issue

Whether the Commission should approve PGE's Advice No. 20-01, which establishes Schedule 16 for use in an electric vehicle (EV) pole charging research and development project (R&D).

Applicable Law

Energy utilities must file tariffs for services provided to retail customers pursuant to ORS 757.205 and 757.210. OAR 860-022-0025 and OAR 860-022-0030 set forth filing requirements for tariffs.

## Analysis

### *Background*

On September 30, 2019, PGE filed its Transportation Electrification Plan. This plan briefly described the deployment of charging stations on distribution poles.<sup>1</sup>

PGE filed Advice No. 20-01 on January 14, 2020, requesting a tariff for a distribution pole charging demonstration project. A tariff is needed to provide terms for implementing the project which will provide service to customers and to provide a session rate.

The Commission has already approved Advice No. 18-11, establishing Schedule 50, a tariff for PGE-owned public charging stations. In a phone call with Staff on February 5, 2020, PGE explained why the Company finds Schedule 50 inadequate for the purposes of this demonstration project. PGE asserted Schedule 50 was narrowly approved for public charging stations that have both level 2 chargers and direct current (DC) fast chargers. These pole chargers only have level 2 ports. PGE also finds the terms of Schedule 50 inadequate, because Schedule 50's prices may prevent a sufficient number of participants from participating in this demonstration. The terms of Schedule 16 provide this service at no cost to the EV operator.

PGE clarified for Staff what the difference is between a "demonstration project" and a pilot. The Company described a demonstration project as a proof of concept at the R&D stage of program development. PGE said a pilot project would require a larger scale. After some internal discussion, Staff has come to accept this distinction for this limited exploration of the use of distribution poles for EV charging.

Staff notes that few of the stated learnings from this demonstration project are dependent on the establishment of Schedule 16. PGE identified them as:

- Operational considerations for deploying charging on poles, including but not limited to design standards, safety considerations, installation costs, pole policies, installation practices, and processes diagrammed.
- City operational considerations such as permitting requirements, right-of-way constraints, parking designations.
- Customer awareness by surveying customers in the area on their awareness of the stations and the chargers' impact on their willingness to consider an EV.
- Evaluation of economics and potential program models.<sup>2</sup>

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<sup>1</sup> Page 118.

<sup>2</sup> PGE. Advice No. 20-01, *NEW Schedule 16, Electric Vehicle Pole Charging Demonstration Project* January 14, 2020, page 1.

Staff would note though, PGE installed these charging stations before Schedule 16's approval. So design standards and permitting requirements clearly don't require this tariff. Here is the distribution pole charger that already exists at SE 29th Avenue between SE Woodward and SE Clinton, Portland, OR:



And here is the distribution pole charger at SE 35th Place between SE Division and SE Clinton, Portland, OR:



*Staff Position*

There are three problems with providing this service at no cost to the EV operator. First, one of the stated purposes of the demonstration project that actually is dependent on the terms of the tariff is the evaluation of pole charging economics. Failing to bill

customers at the terms PGE would expect in a fully deployed program will compromise the economic analysis. Second, the terms of Schedule 16 may send unsustainable pricing signals to EV operators. Third, providing this service at no cost to EV operators may be an abuse of PGE's guaranteed profit position in the charging station business when other providers of this service must pay the terms of Schedule 38. Staff recommends the Commission approve Schedule 16, despite these three concerns, because of the short duration of the demonstration project, the location of the project, and because of PGE's approach to limiting costs.

The project will come to completion on December 15, 2020. This short duration will unlikely have a material impact on EV owners' price expectations. The Company has agreed in conversations with Staff that its intent is to have the relevant tariff sheets automatically expire on December 15, 2020.

One driver of this schedule is the lease on the charging equipment. PGE may be saving money in this demonstration project by experimenting first, before making major capital expenditures.

PGE is pioneering charging station deployment in an area dense with multifamily dwellings. This may broaden the exposure and availability of EV infrastructure beyond single-family residents, making this demonstration project as novel in 2020 for this neighborhood as public charging stations were for downtown Portland when Electric Avenue was first electrified in 2011.

Instead of amending the terms of this proposed tariff, Staff recommends amending PGE's filing to make clear that Schedule 16 will automatically expire when this demonstration project ends on December 15, 2020. This will give PGE the opportunity to maximize the number of program participants for observing the use of these two charging stations, knowing the economic analysis has been compromised.

Staff will be following the progress of this demonstration project closely. If the learnings at this R&D level lead to a proposal for a distribution pole charging pilot, Staff will expect the study of the pilot's economics to be a more central concern, making the terms of Schedule 50 or a new schedule a more appropriate choice in the future.

### Conclusion

Staff recommends the Commission approve PGE's Advice No. 20-01 with an automatic expiration date of December 15, 2020.

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**PROPOSED COMMISSION MOTION:**

Approve PGE's Advice No. 20-01, effective March 1, 2020 to December 15, 2020.

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