

ITEM NO. CA5

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: December 1, 2020**

REGULAR CONSENT EFFECTIVE DATE December 16, 2020

DATE: November 23, 2020

TO: Public Utility Commission

FROM: Eric Shierman

THROUGH: Bryan Conway, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1081/Advice No. 20-32)
Request to Extend Schedule 16.

STAFF RECOMMENDATION:

The Public Utility Commission of Oregon (OPUC or Commission) should approve Portland General Electric Company's (PGE or Company) Advice No. 20-32.

DISCUSSION:

Issue

Whether the Commission should approve Advice No. 20-32, PGE's proposal to extend for three months the current terms of Schedule 16, a tariff for the pole charging demonstration project.

Applicable Rule

Under ORS 757.205(1):

Every public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules which shall be open to public inspection, showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, or for any service in connection therewith or performed by any public utility controlled or operated by it.

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable. ORS 757.210. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

Filings that propose 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 change. ORS 757.220; OAR 860-022-0015. Tariff filings to be effective on less than 30 days following notice of the change may be authorized with a waiver of less than statutory notice pursuant to ORS 757.220 and OAR 860-022-0020.

OAR 860-022-0030(1) further requires that for tariff or schedule filings proposing increased rates, the utility must for each separate schedule, identify the total number of customers affected, the total annual revenue derived under the existing schedule, and the amount of estimated revenue which will be derived from applying the proposed schedule, the average monthly use and resulting bills under both the existing rates and the proposed rates that will fairly represent the application of the proposed tariff or schedules, and the reasons or grounds relied upon in support of the proposed increase.

Analysis

Background

On January 14, 2020, PGE first filed an advice letter proposing a special tariff for the Company's pole charging demonstration project, which sites electric vehicle service equipment (EVSE) on distribution poles. At the February 25, 2020 Public Meeting, Staff recommended the Commission approve this proposal, provided that the terms of offering the service for free expire on December 15, 2020. The Commission adopted Staff's recommendation.

In accordance with Staff's recommendation, PGE has been working on changing the terms of Schedule 16. On October 27, 2020, the Company notified Staff that by previously providing energy at no cost to the electric vehicle (EV) operator, the City of Portland (City) did not require a franchise fee. Now that PGE seeks to require payment from EV operators, the Company must negotiate a franchise agreement with the City municipal government. PGE is having delays reaching an agreement with the City. The three-month extension is to grant more time for PGE and the City to come to agreement.

Lessons Learned

Staff finds that the Company has demonstrated value in its initial findings from this R&D project. As a result, Staff recommends the Commission approve this three-month extension to avoid a disruption of service during negotiations with the City of Portland.

PGE’s advice letter includes an attached white paper summarizing the lesson learned from this R&D project. The Company believes the results signal success. Those results, in the table below, were taken from 233 active days of operation.¹

Key Performance Indicator	SE 29th Ave.	SE 35th Pl.
kWh used	3,874.634	7,524.346
Number of Unique Users	95	105
Number of Sessions	259	406
Number of Sessions per day	1.12	1.74
Average Duration of Stay	4 hours, 05 minutes and 50 seconds	4 hours, 16 minutes and 32 seconds
Average Charging time	2 hours, 47 minutes and 10 seconds	2 hours, 59 minutes and 20 seconds

PGE notes two problems that mitigated utilization of these two pole chargers during this experiment. The first is COVID-19. The second is that PGE sought EV-only parking from the City and was granted this exclusive use of the public parking space, but the City didn’t mark these spaces with notification of this exclusion until after the project’s implementation.

The SE 35th Place location was marked as “EV-only” in May. The SE 29th Ave location didn’t receive City markings until the end of August (see Figure 1 below). Though the two sites are in the same neighborhood, the one with earlier City signage delivered 94 percent more energy outlays. This may have served as a natural experiment for the importance of this EV-only status.

¹ See ADV 1081, Portland General Electric Company, PGE Electric Vehicle Pole Charging Demonstration Project, Attachment A, Table 3, November 3, 2019, page 13.



Figure 1: City Sign

Another important lesson this demonstration project produced is the potential for cost saving in comparison to parking lot stalls. Because the EVSE is sited closer to a distribution pole, the cost of the line extension and the site’s electrical work (make ready), are lower on a per port basis.²

Cost Category	Description	Parking Stall (\$/port)	Utility Pole (\$/port)
Utility Labor and Materials	Cost of primary conductor, secondary conductor, transformer (if applicable), meter equipment, and associated labor.	\$500 - \$1,000	\$500 - \$1,000
Make-ready Labor, Materials and EVSE Installation	Includes primary pathway (if applicable), secondary pathway, meter base, distribution panel, and branch circuit pathway and conductor, and associated labor. Mounting of EVSE to utility pole and/or connection to make-ready infrastructure.	\$4,100 - \$10,500	\$500 - \$1,000
Engineering, Design, Permits, and Fees	Civil / electrical engineering and design costs (if applicable), permits, and right-of-way / franchise fees (if applicable)	\$150 - \$300	\$1,210 - \$2,000
TOTAL		\$4,750 - \$11,800	\$2,210 - \$4,000

Staff finds enough value in these findings to recommend the Commission approve this three-month extension so the two existing sites’ service will not be interrupted on account of stalled negotiations with the City.

² See ADV 1081, Portland General Electric Company, PGE Electric Vehicle Pole Charging Demonstration Project, Attachment A, Table 2, November 3, 2019, page 11.

Next Steps

If a franchise agreement with the City can be achieved during this three-month extension, in addition to adding a fee for the EV operator, PGE plans to add up to three other sites outside the City of Portland. These other sites would be connected to a street light.

On October 14, 2020, PGE and Staff discussed the terms of a revised tariff. Rather than use the terms of the Company's tariff for its public charging stations (Schedule 50), PGE said the Company would like to offer terms more like its residential service block rate at 12 cents per kWh. Staff recommended using a time of use (TOU) rate such as Schedule 7's TOU option. This would be consistent with other public charging rates. The Company's Schedule 50 and other companies' use of Schedule 38 both incentivize off-peak charging. Since Schedule 7's TOU off-peak rate is just over 4 cents per kWh, this will also give EV operators an opportunity to charge at a significantly lower cost than 13 cents per kWh. Staff will be engaging with PGE over the next three months to resolve the charging rate situation prior to PGE's refiling in early 2021.

Conclusion

PGE deserves recognition for being the first electric company in Oregon to research the deployment of EVSE on distribution poles. Staff recommends the Commission approve this three-month extension to avoid a disruption of service during negotiations with the City of Portland.

PROPOSED COMMISSION MOTION:

Approve PGE's Advice No. 20-32.