



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

August 27, 2020

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

RE: Advice No. 20-25, Schedule 4, Multifamily Water Heater Pilot Extension

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 **October 1, 2020**:

Third Revision of Sheet No. 4-2
Third Revision of Sheet No. 4-4

The purpose of this filing is to extend the Multifamily Residential Demand Response Water Heater, also known as Multifamily Water Heater (MFWH), pilot through January 31, 2021. Currently, the pilot is set to expire on September 30, 2020. PGE had filed in Advice No. 20-05, extending the pilot from March 31, 2020 to September 30, 2020. Between the date of the last extension approval PGE has experienced unforeseen installation delays due to COVID-19 and associated customer safety concerns. This term extension will serve for PGE to install all contracted units up to the 10,000 water heater controls outlined by the existing tariff. Additionally, during this period PGE will review program activity in relation to current markets and provide Staff with information regarding a future proposal for continuation of Schedule 4.

To satisfy the requirements of OAR 860-022-0025, PGE responds as follows:

The proposed revisions to Schedule 4, Multifamily Water Heater Pilot, do not increase, decrease, otherwise change existing rates, or impact revenues; costs are being deferred in UM 1827 for later ratemaking treatment.

Please direct questions to Santiago Beltran Laborde at (503) 464-7902. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing and Tariffs

Enclosure
cc Nick Sayen, OPUC

SCHEDULE 4 (Continued)

APPLICABLE

Subject to selection by the Company, Residential Customers may participate in the pilot. Customers in multifamily residences (MFRs) will be the primary target of PGE's pilot. In cases of rental properties, the program will be structured as an opt-out program, meaning Customers will be automatically enrolled in the pilot if their property manager or property owner enrolls in the pilot and the Customer must withdraw from the program if they do not want to participate.

Customers will be given notice about this pilot at the time of installation of the communication interface. PGE will provide tenants with contact information and instructions on how to opt out of the pilot at the time of installation. If a Customer chooses to opt out of this pilot, the installed communication interface and any other installed PGE equipment will remain on the water heater. A Customer that has elected to opt out will be removed from the dispatch of direct load control events. A new Customer in a residence will be automatically enrolled in the pilot and will receive information and instructions on how to opt out of the pilot. PGE will be aware of a new tenant based on customer data from PGE's Customer Information System (CIS). The number of eligible Customers to participate in the pilot is 10,000 customer households. Customers will remain on Schedule 7 and will be eligible for the incentives described in this schedule.

ELIGIBILITY

For MFRs, PGE will initially select large complexes, negotiating with property manager or owners for the installation of retrofit devices as well as new demand response enabled water heaters. At PGE's discretion, the Company will select qualifying properties based on number of apartments, size of apartments, occupancy, and size of existing water heater.

DIRECT LOAD CONTROL EVENT

During the pilot there will be no limitation on the hours of Direct Load Control Events. This pilot will offer the ability for the Customer to override a direct load control event, under the terms listed in Special Condition 4 of this pilot. Residential Customers living in MFRs may opt out of the program at their discretion.

ENROLLMENT

The Customer enrollment period will be through January 31, 2021. PGE will enroll MFR Customers by contracting with the property manager or property owner. Unless this pilot is otherwise terminated, participating Customers will be enrolled for the entire pilot term.

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SCHEDULE 4 (Concluded)

SPECIAL CONDITIONS

Customer

1. The Customer may terminate service under this pilot voluntarily. The Customer will not receive a participation incentive if they withdraw or are removed from the pilot. The Customer must notify PGE to withdraw from the pilot.
2. If a Customer withdraws or is removed from the pilot, the Customer is not eligible for reenrollment during the pilot.
3. If the Customer moves from the enrolled residence during the term of the pilot, they are no longer eligible for the pilot.
4. The Customer may activate a 24-hour suspension from the pilot by notifying the Company through a Customer specific log-in page on the PGE website. A Customer may be removed from the pilot if they implement the override option excessively; an example of excessive is override use for more than 100 days, or more than 15 days in any 30-day period.
5. To receive a participation incentive, the Customer must respond to weekly surveys regarding the pilot.

PGE

6. PGE has the right to remove a Customer from the pilot at any time, for any reason.
7. PGE is not responsible for any direct, consequential, incidental, punitive, exemplary, or indirect damages to the participating Customer or third parties that result from Direct Load Control Events.
8. Communication interfaces installed onto the water heater will remain the property of the Company before, during and after the conclusion of the pilot. The customer shall return the device in a pre-paid postage box provided by PGE.
9. The provisions of this schedule do not apply for any time period that the Company interrupts the Customer's load for a system emergency or any other time that a Customer's service is interrupted by events outside the control of the Company.

TERM

The duration of this pilot is through January 31, 2021.

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