



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

April 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. 20-10, Schedule 7, Peak Time Rebate Event Participation

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 a proposed tariff sheet associated with Tariff P.U.C. No. 18 with a requested effective date of **June 3, 2020**.

Tenth Revision of Sheet No. 7-2

The purpose of this filing is to increase the maximum number of participants enrolled in PGE's Peak Time Rebate (PTR) Event option. This update increases the enrollment limit from the first 110,00 Residential Customers to 160,000 Residential Customers.

PGE requests this change because customer acceptance and adoption of the program far exceeded the enrollment forecast in 2019. Initially, PGE expected 55,000 customers to enroll by the end of 2019; instead almost 80,000 voluntarily chose to enroll in the program. In addition, the demand response value PGE expected, based on PGE's Flex 1.0 planning value fell short of the forecast due to the program differences. In order for PGE to achieve our Integrated Resource Plan (IRP) goal for the year, PGE intends to focus efforts on increasing Demand Response (DR) value and enrollment. PGE plans to target a strategic control growth of the program, focused on customers who can be most successful delivering DR value while PGE also delivers additional saving tips for those enrolled already, to help them achieve their savings potential. Program growth and maximizing customer level savings are fundamental to achieving cost effectiveness. The PTR program is expected to contribute 34MW's toward PGE's 2020 DR goal of 77 MW.

When PGE initially filed its PTR with the Commission to mitigate possible revenue risk and test the market, customer enrollment was capped at 110,000 Residential Customers to ensure there was no gaming. PGE has not identified evidence of gaming by customers.

PGE plans to evaluate the cost effectiveness of PTR after implementing several changes for the summer 2020 season. Provided they lead to improved cost effectiveness, PGE will follow up with a filing requesting to remove the participation limit.

PTR Background

After noting that demand response resources result in more efficient use of existing resources and reduce the need to procure new generating resources, resulting in reduced energy bills and improved environmental benefits, Senate Bill 1547¹ instructs PGE to acquire all cost-effective demand response resources as directed by the Commission. The Commission's objective is to achieve a significant degree of peak load reduction through customer demand response programs². PGE's residential PTR program aims to help achieve specific IRP-identified demand response goals. The PTR approach induces customers to shift their energy demand away from high peak-load time periods.

On February 8, 2019 PGE submitted Advice No. 19-03, which was approved by the Commission and effective on May 1, 2019. The purpose of the filing was to implement PGE's Schedule 7 Flexible Residential Pricing Program (Flex 2.0), which was piloted as Flex 1.0 from 2015-2018 in Public Utility Commission of Oregon Docket No. UM 1708. In moving from pilot to program, PGE revised its residential standard service option, Schedule 7 to include the Opt-in Peak Time Rebate option.

- Customers choosing to participate in this option provides a PTR as an incentive to customers who use less electricity during critical peak events. Participants are notified prior to the event. After a PTR event, PGE measures the customer's energy reduction based on the customer's energy use compared to the customer's baseline usage to determine the amount of hourly kilowatt reduction and the amount of the rebate.

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

This change does not increase, decrease, otherwise change existing rates, or impact revenues.

Please direct any questions regarding this filing to Chris Pleasant at (503) 464-2555. Please direct your communications related to this filing to the following email address: pge.opuc.filings@pqn.com.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosure

¹ Enrolled Senate Bill 1547 (2016 Regular Session, 78th Oregon Legislative Assembly), Section 19.
² See April 3, 2019 OPUC Staff Memo, PGE Advice Filing 19-03/Docket No. ADV 920, page 5.

SCHEDULE 7 (Continued)

ENERGY PRICE PLANS: DEFAULT PLAN (Continued)

Peak Time Rebate Event Participation

Residential Customers on the default plan can also enroll and participate in PTR events. This option is available for enrollment to the first 160,000 Residential Customers. Customer enrollment will close once the program has 160,000 Residential Customers.

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Monthly Rate

Customers on the default plan plus PTR will pay the default plan monthly rate – which includes Basic Charge, transmission and related services, and distribution charges. Energy Charges may also include the following PTR credit:

PTR Credit	100.00	¢ per kWh
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To receive the PTR Credit, the Customer must reduce Energy use during a PTR Event. Such event will be a two- to five-consecutive-hour window between the hours of 7:00 AM to 11:00 AM or 3:00 PM to 8:00 PM. Events will not be called on holidays. Holidays are New Year's Day on January 1; Memorial Day, the last Monday in May; Independence Day on July 4; Labor Day, the first Monday in September; Thanksgiving Day, the fourth Thursday in November; and Christmas Day on 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.

The PTR program has two event seasons: summer (the successive calendar months of June through September) and winter (successive calendar months of November through February). The Company will call PTR events only in event seasons. Prior to each season, the Company will remind the enrolled Customers that they are on the program, that they may participate in PTR events, and ways to be successful.

The Company initiates PTR events with an event notification to participating Customers the day prior to the PTR event. Participating Customers must choose at least one method for receipt of notification: email, text, or another available option. The Company will not call PTR events 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.