



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

August 28, 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. 20-26, Schedule 26, Nonresidential Demand Response Program Update

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**:

- Twenty Seventh Revision of Sheet No. 1-1
- Second Revision of Sheet No. 26-1
- First Revision of Sheet No. 26-2
- First Revision of Sheet No. 26-3
- First Revision of Sheet No. 26-4
- Fourth Revision of Sheet No. 26-5
- Second Revision of Sheet No. 26-6
- Fourth Revision of Sheet No. 26-7
- Third Revision of Sheet No. 26-8
- Original Sheet No. 26-9

The Nonresidential Demand Response Pilot (Schedule 26) is set to expire on September 30, 2020. The purpose of this filing is to prepare Schedule 26 to move from pilot status to program by augmenting the tariff language. Specifically, PGE proposes the removal of "Pilot" and the tariff's term (or end date) within the body of the tariff. Despite an open-ended term, the tariff will require annual maintenance to ensure that the Mid-C pricing tables and customer payment levels are kept current. Additional adjustments have been proposed throughout the body of the tariff as housekeeping measures and are not intended to impact the program design or PGE's ability to operate the program. Housekeeping items streamline language and ensure definitions of key concepts are consistently used. These nuanced changes position the tariff as a proven concept that is ready to become a Program and permanent part of PGE operations.

Background

Schedule 25 (Nonresidential Direct Load Control Pilot) and Schedule 26 are collectively marketed and commonly known as “Energy Partner” to business customers. In compliance with Order No. 17-429, these tariffs went into effect on December 1, 2017.¹ Energy Partner replaced both PGE’s Schedule 77 Firm Load Reduction Program and the Automated Demand Response Pilot. Like other demand response offerings PGE recovers incremental costs of Energy Partner through Schedule 135 (Demand Response Cost Recovery Mechanism). Although Schedules 25 and 26 are two distinct products that share a common objective of shifting business customers’ loads during peak times, only Schedule 26 will transition to a program and Schedule 25 will remain in pilot status. Energy Partner is designed to address both the needs of PGE’s nonresidential customers while helping to grow a resilient and flexible demand response portfolio to create a program able to meet PGE’s goals of greater than 77 MW of nonresidential peak load reduction by 2021; within the overarching goal, Energy Partner’s goal is 27 MW.²

Through the pilot phase of Schedule 26, PGE tested implementation, customer engagement, and marketing approaches, measured customer satisfaction and acceptance, provided final validation of the business case, and demonstrated cost effectiveness. As a result of the pilot’s achievements, activities are cost-effective, performance is stable and reliable, and the budgets are forecastable within an acceptable tolerance.

The pilot-to-program criteria outlined below were gained through numerous learnings in the context of an accelerated resource build with a high degree of risk. Consequently, Schedule 26 will be the first PGE pilot to transition into a program and many of the Company’s flexible load or demand response customer offerings will remain in the pilot phase. PGE sees five key interrelated considerations for the transition from pilot-to-program offering:

- Customer Experience
- Infrastructure Stability
- Grid Performance
- Financial Performance
- Dispatch Integration

These criteria do not constitute a pilot’s readiness to transition to a program. Energy Partner has met the proposed pilot to program criteria, but PGE and Commission Staff need to discuss cost recovery and program treatment once a pilot has met the criteria. As PGE transitions to multi-year planning and budgeting, we will propose program and cost recovery treatment of Energy Partner Schedule 26 as part of the Strategic Plan and Budget that will follow the submittal of PGE’s Flexible Load Plan to the Commission.

¹ See OPUC Docket No. ADV 646, Advice No. 17-23, approved at the November 21, 2017 public meeting. Retrieved from <https://edocs.puc.state.or.us/efdocs/UBH/adv646ubh145442.pdf>

² See OPUC Docket No. UM 1514, PGE’s Application for Reauthorization of Deferral of Incremental Costs Associated with Non-Residential Demand Response filed on September 21, 2017, page 2. Retrieved from: <https://edocs.puc.state.or.us/efdocs/HAQ/um1514haq142830.pdf>

The deferral reauthorization, tariff update (for Mid-C pricing), and transition plan will be filed in November 2020. Combined evaluations (for Schedules 25 and 26) for the Summer 2019 and Winter 2019/2020 season will be submitted in September 2020.

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

The proposed revisions to Schedule 26, Nonresidential Demand Response Pilot Program, do not increase, decrease, otherwise change existing rates, or impact revenues; costs are being deferred in UM 1514 for later ratemaking treatment.

Please direct questions to Casey Manley at (503) 464-8258. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pqn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing and Tariffs

Enclosures

Cc: Kacia Brockman, OPUC

**PORTLAND GENERAL ELECTRIC COMPANY
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SCHEDULE 26
NONRESIDENTIAL DEMAND RESPONSE PROGRAM

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PURPOSE

This schedule is an optional supplemental service that provides participating Large Nonresidential Customers incentives through Firm Load Reduction and Reservation Payments for reducing a committed amount of load at the request of the Company. Under this tariff, the Customer provides a Committed Load Reduction that the Company calls at any time according to the conditions detailed below.

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DEFINITIONS

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Advance-Notice Option – The notification period in which the Company will alert the Customer prior to a Load Reduction Event; options include 18 hours, 4 hours, and 10 minutes.

Baseline Load Profile – The average hourly load of the five highest load days in the last ten Typical Operational Days for the Event Season period.

Committed Load Reduction – A Customer nomination of load that represents the anticipated amount of Demand (kW) curtailed during an event.

Firm Load Reduction – The difference between the Customer's Baseline Load Profile and the Customer's measured hourly energy usage during the Load Reduction Event.

Firm Load Reduction Payment – The payment made by the Company to the Customer, as determined by The Mid-Columbia Electricity Index (Mid-C) as reported by the Powerdex, adjusted for losses based on the Customer's delivery voltage, which can be up to 120% of the commitment.

Firm Load Reduction Commitment (Agreement) – An agreement between the Company and Customer that defines the Committed Load Reduction, Firm Load Reduction Options and Customer payments based on Qualified Load Reductions during a Load Reduction Event

Firm Load Reduction Options – Elections that determine the Customer's incentive levels; which include the maximum event hours per season option, the Advance-Notice Option, and the event windows (time period for an event) for which they want to participate.

Holidays – The following are holidays for purposes of the pilot: New Year's Day (January 1), Martin Luther King Day (third Monday in January), President's Day (third Monday in February), Independence Day (July 4), Labor Day (first Monday in September), Thanksgiving Day (fourth Thursday in November), and Christmas Day (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.

Load Reduction Event – An event that is called during the Winter Event Season or the Summer Event Season, where customer incentives are offered to offset the Committed Load Reduction.

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SCHEDULE 26 (Continued)

DEFINITIONS (Continued)

Participation Month – The current calendar month during a Winter Event Season or the Summer Event Season.

Qualified Load Reduction – The average load reduction percentage for all event hours during the Participation Month must be 70% or greater to be qualified.

Reservation Payment – The payment made by the Company to the Customer, where the Customer's Qualified Load Reduction (kW) is multiplied by the sum of each applicable reservation price (\$/kW) based on the options selected by the Customer adjusted for losses based on the Customer's delivery voltage.

Summer Event Season – Includes the successive calendar months June through September.

Typical Operational Days – Represents the 10 applicable days closest to the Load Reduction Event.

Winter Event Season – Includes the successive calendar months November through February.

AVAILABLE

In all territory served by the Company.

APPLICABLE

To qualifying Nonresidential Customers served under Schedules 32, 38, 47, 49, 75, 83, 85, 89, and 90. Participating Nonresidential Customers must execute the Firm Load Reduction Commitment (Agreement) to participate in this program.

CUSTOMER ENROLLMENT

Customers must be enrolled and have completed enablement at least five business days prior to the Participation Month.

At the time of enrollment, the Customer chooses the Firm Load Reduction Options, which includes the Participation Option, the maximum event hours per season option, the Advance-Notice Option, and the event windows (time period for an event) for which they want to participate. The load reduction amount is agreed to by the Customer and the Company, or its representative. First-time participants can also opt-in for a commissioning test.

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SCHEDULE 26 (Continued)

CUSTOMER ENROLLMENT (Continued)

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Within five business days of enrollment, the Company will confirm receipt of the Service Point ID (SPID) the Customer intends to enroll under this schedule and the Company or its representatives will send a signed Agreement to the Customer's representative. The Customer may choose to aggregate SPIDs.

Each Agreement will automatically renew for successive annual terms on January 1st of subsequent calendar years unless the Customer elects to terminate such Agreement by notifying PGE prior to January 1st or this Schedule is withdrawn, revoked or otherwise terminated.

CUSTOMER PARTICIPATION OPTIONS

Customers are offered three participation options of the contracted program year: Option 1 the Customer participates for both event seasons; Option 2 the Customer participates in the only Summer Event Season; and Option 3 the Customer participates in only the Winter Event Season.

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Customer Option	Participation Months	Event Seasons
1	Nov, Dec, Jan, Feb, Jun, Jul, Aug, Sep	Both event seasons
2	Jun, Jul, Aug, Sep	Summer Event Season only
3	Nov, Dec, Jan, Feb	Winter Event Season only

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FIRM LOAD REDUCTION OPTIONS

Several Firm Load Reduction Options are available to Customers in the reservation price section of this schedule. Options include differing maximum event hours per season, Advance-Notice Options, and event windows. For each event season, only one 'maximum hours' selection and one 'notification period' selection can be chosen for all event windows in which the Customer chooses to participate.

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SCHEDULE 26 (Continued)

RESERVATION PRICE

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20 Event Hours Maximum per Season

Monthly Payment per kW

	Notification Period		
	18 hours	4 hours	10 minutes
Summer (June - September)			
11 am - 4 pm	\$1.68	\$1.80	\$1.91
4 pm - 8 pm	\$1.95	\$2.08	\$2.22
8 pm - 10 pm	\$0.39	\$0.42	\$0.45
All summer windows	\$4.02	\$4.30	\$4.57
Winter (November - February)			
7 am - 11 am	\$1.27	\$1.35	\$1.44
11 am - 4 pm	\$0.73	\$0.78	\$0.83
4 pm - 8 pm	\$2.07	\$2.22	\$2.36
8 pm - 10 pm	\$0.73	\$0.78	\$0.83
All winter windows	\$4.80	\$5.13	\$5.46

40 Event Hours per Season

Monthly Payment per kW

Windows	Notification Period		
	18 hours	4 hours	10 minutes
Summer (June - September)			
11 am - 4 pm	\$2.52	\$2.69	\$2.87
4 pm - 8 pm	\$2.92	\$3.12	\$3.32
8 pm - 10 pm	\$0.59	\$0.63	\$0.67
All summer windows	\$6.04	\$6.45	\$6.86
Winter (November - February)			
7 am - 11 am	\$1.90	\$2.03	\$2.16
11 am - 4 pm	\$1.09	\$1.17	\$1.24
4 pm - 8 pm	\$3.11	\$3.32	\$3.54
8 pm - 10 pm	\$1.09	\$1.17	\$1.24
All winter windows	\$7.20	\$7.70	\$8.19

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SCHEDULE 26 (Continued)

RESERVATION PRICE (Continued)

80 Event Hours Maximum per Season

Monthly Payment per kW

	Notification Period		
	18 hours	4 hours	10 minutes
Summer (June - September)			
11 am - 4 pm	\$3.35	\$3.58	\$3.81
4 pm - 8 pm	\$3.89	\$4.16	\$4.42
8 pm - 10 pm	\$0.79	\$0.84	\$0.89
All summer windows	\$8.03	\$8.58	\$9.12
Winter (November - February)			
7 am - 11 am	\$2.53	\$2.70	\$2.87
11 am - 4 pm	\$1.46	\$1.56	\$1.65
4 pm - 8 pm	\$4.14	\$4.42	\$4.70
8 pm - 10 pm	\$1.46	\$1.56	\$1.65
All winter windows	\$9.58	\$10.23	\$10.89

COMMITTED LOAD REDUCTION

If a Customer has completed a test event, but not participated in actual events, their Committed Load Reduction will be based on nominated load identified in the agreement. If a Customer has completed only one event, their Committed Load Reduction will be the higher of either their nominated load or their first event performance. If a Customer has participated in more than one event, their Committed Load Reduction will be based on an average of actual load reductions during event hours. The Customer, at its discretion, may choose to increase its nomination above the levels described above.

QUALIFIED LOAD REDUCTION

If no events are called in a Participation Month, the Customer qualifies for the full Reservation Payment; the Qualified Load Reduction is the Committed Load Reduction.

In order to qualify for the full Reservation Payment during a month with events, the Customer must provide a minimum of 90% of the Committed Load Reduction on average over each event for which the Customer is enrolled during events in that month. If the Customer qualifies for the full Reservation Payment; the Qualified Load Reduction is the Committed Load Reduction.

To qualify for a proportional reservation payment during a month with events, the Customer must deliver a minimum of 70% of the Committed Load Reduction on average over each event for which the Customer is enrolled during events in that month. If the Customer qualifies for a reduced reservation payment; the Qualified Load Reduction is the average load reduction percentage for all event hours during that month.

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SCHEDULE 26 (Continued)

QUALIFIED LOAD REDUCTION (Continued)

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If the Customer fails to deliver a minimum of 70% of the Committed Load Reduction on average during an event for which the Customer is enrolled during events in that month, the Customer is not eligible for the Energy Reduction Payment for that Event and the Reservation Payment for that month. If other Load Reduction Events are called in the same month, and the Customer complies, the corresponding Energy Reduction Payments are paid for each event that the Customer delivers a minimum of 70% of the Committed Load Reduction on average over each event for which the Customer is enrolled during events in that month.

RESERVATION PAYMENTS

The Reservation Payment is the Customer's Qualified Load Reduction (kW) multiplied by the sum of each applicable Reservation Price (\$/kW) based on the Options selected by the Customer adjusted for losses based on the Customer's delivery voltage. For each event window (time period for an event) per season, only one price is applicable. The Reservation Payment is made to the Customer no later than 60 days after the month in which they participated.

ENERGY PAYMENTS

The Energy Payment is the Mid-Columbia Electricity Index (Mid-C) as reported by the Powerdex, adjusted for losses based on the Customer's delivery voltage. The Firm Energy Reduction Amount can be up to 120% of the commitment.

The monthly energy prices (per MWh) for the months in which the events are called* are:

Jan 2020	Feb 2020	Jun 2020	Jul 2020	Aug 2020	Sep 2020	Nov 2020	Dec 2020
\$35.15	\$32.45	\$20.90	\$44.30	\$54.40	\$36.65	\$29.65	\$42.80

The Firm Energy Reduction Payment rates will be updated by December 1st for the next year beginning in January. Evaluation and settlement of the Firm Energy Reduction Payment will occur within 60 days of the Firm Load Reduction Event.

* PGE will not call events on Saturdays, Sundays, or Holidays. Holidays are New Year's Day (January 1), President's Day (third Monday of February), Memorial Day (last Monday in May), Independence Day (July 4), Labor Day (first Monday in September), Thanksgiving Day (fourth Thursday in November), and Christmas Day (December 25). If a holiday falls on Saturday, Friday is designated a holiday. If a holiday falls on Sunday, the following Monday is designated a holiday.

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SCHEDULE 26 (Continued)

LINE LOSSES

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Losses will be included by multiplying the applicable price by the following adjustment factors:

Subtransmission Delivery Voltage	1.0356
Primary Delivery Voltage	1.0496
Secondary Delivery Voltage	1.0685

LOAD REDUCTION MEASUREMENT

Load reduction is measured as a reduction of Demand from a customer baseline load calculation during each hour of the Load Reduction Event. Although the Agreement shall specify the customer baseline load calculation methodology to be used, PGE generally uses the following baseline methodology:

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Baseline Load Profile

The Baseline Load Profile is based upon the average hourly load of the five highest load days in the last ten Typical Operational Days for the event season period. For Customers choosing the four-hour or 10-minute notification options there is an adjustment to the amounts above to reflect the day-of operational characteristics leading up to the Event if the Event starts at 11 am or later. This adjustment is the difference between the Event day load and the average load of the five highest days used in the load profile above during the two-hour period ending four hours prior to the start of the Event.

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Typical Operational Days

Typical Operational Days exclude days that a Customer has participated in a Firm Load Reduction Event or pre-scheduled opt-out days as defined in the Special Conditions. Typical Operational Days for the baseline calculation are defined as the ten applicable days closest to the Load Reduction Event. Typical Operational Days may include or exclude Saturdays, Sundays and Western Electricity Coordinating Council (WECC) holidays.

The Company may decline the Customer's enrollment application when the Company determines the Customer's energy usage is highly variable and the Company is not able to verify that a reduction will be made when called upon.

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LOAD REDUCTION EVENT

The Company, at its discretion, initiates a Load Reduction Event by providing the participating Customer with the appropriate notification consistent with the Customer's selected Firm Load Reduction Option. The Customer reduces its Demand served by the Company, for each hour of the Load Reduction Event to achieve its Committed Load Reduction. Each Load Reduction Event will last from one to five hours in duration and the Company will call at least one event per season.

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The Company initiates Load Reduction Events during the Events Season.

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SCHEDULE 26 (Continued)

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EVENT NOTIFICATION

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The Company notifies the participating Customer of a Load Reduction Event using a mutually agreed upon method at the time of enrollment. The Company's notification includes a time and date by which the Customer must reduce the committed Demand for each period of the Load Reduction Event.

The Customer is responsible to notify the Company if the Customer's contact information specified at the time of the enrollment changes as soon as such change occurs.

FIRST-TIME PARTICIPANT OPTIONAL COMMISSION TEST

A commissioning test is available to Customers who are participating on this schedule for the first time. Interested participants will work with the Company to learn the details of this process.

SPECIAL CONDITIONS

1. Customers cannot use on-site diesel, pipeline natural gas or propane or other carbon emitting generation equipment for load reductions to meet load reduction commitments under this tariff.
2. Customers that choose to take service under Schedules 86, 485, 489, 490, 532, 538, 549, 575, 583, 585, 589, 590, or 689 will be withdrawn from this program.
3. Firm Load Reduction by Schedule 75 Customers will not exceed the Customer's baseline Demand as specified in the Agreement between the Customer and the Company. Customer cannot use purchases under Schedule 76 to meet load reduction commitments under this tariff. In the case of Customers participating on Schedule 76R – Partial Requirements Economic Replacement Power Rider – at the time of the event, the energy imbalance will not apply during event hours and for the event energy amount.
4. The Company is not responsible for any consequences to the participating Customer that results from the Firm Load Reduction Event or the Customer's effort to reduce Energy in response to a Firm Load Reduction Event.
5. This tariff is not applicable when the Company requests or initiates Load Reduction affecting a Customer SPID under system emergency conditions described in Rule N or Rule C(2)(B).
6. The Company will not cancel or shorten the duration of a Firm Reduction Event once notification has been provided.
7. Participating Customers are required to have interval metering and meter communication in place prior to initiation of service under this schedule. The Company will provide and install necessary equipment which allows the Company and the Customer to monitor the Customer's energy usage.

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SCHEDULE 26 (Concluded)

SPECIAL CONDITIONS (Continued)

8. If the Customer experiences operational changes or a service disconnection that impairs the ability of the customer to provide the Firm Load Reduction as requested under this schedule, the agreement will be terminated.
9. If the Company is not allowed to recover any costs of this program by the Commission, the Company may, at its option, terminate service under this agreement with 30-day notice.
10. The Customer may pre-schedule four opt-out days per season as indicated in the Agreement. If the Company calls a Load Reduction Event on a pre-scheduled opt-out day, the Customer is exempt from providing load reduction and receives no Firm Energy Reduction Payment, whether or not they choose to operate. The Customer will receive the Reservation Payment if otherwise eligible. An opt-out day will not be included in the calculation of the Baseline Demand profile.
11. Customers who opt for this Schedule may be placed on a calendar monthly billing cycle.

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