



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

September 8, 2020

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street S.E., Suite 100  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: Advice No. 20-28, Schedule 5 Residential Direct Load Control Pilot Update**

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rule 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **October 21, 2020**:

Third Revision of Sheet No. 5-3

PGE seeks to revise Schedule 5 Residential Direct Load Control Pilot to provide flexibility that will increase PGE's ability to learn from Schedule 5. The Residential Thermostat Direct Installation channel currently discusses a mechanism by which customers will be charged a "Payback of Thermostat Labor & Materials" when they participate in less than 50% of the event hours for which the customer is eligible during an Event Season. Approximately 10% of direct install customers failed to participate in the required 50% participation rate. Given that the program has existed for two Event Seasons, PGE conducted a survey sent out to the customers who did not meet the participation threshold.

The results of the survey indicate that further education about the program is necessary and may increase participation. Respondents' answers suggest improvement in the following areas could increase participation:

- More information about the program, including a better overview of the minimum participation threshold
- Updated event notice procedures

A profile analysis of survey respondents indicates that customers who failed to meet the minimum participation threshold belong to groups (older customers, customers with low propensity to technology, or likely to benefit most from the Schedule given high bill costs) where it may be detrimental to enforce the payback. The Schedule 5 updates submitted herein provide the flexibility PGE needs to act on improving customer awareness and participation for the pilot.

Additionally, to clarify the intent of a payback mechanism, PGE proposes changes clarifying that the payback mechanism would apply to customers who remove the enrolled thermostat, not to customers who move and leave the enrolled thermostat onsite.

Separately, given current events regarding COVID-19, PGE's Residential Thermostat Direct Installation channel has experienced a sharp decline in installations. PGE is concerned about the wellbeing of PGE customers and CLEAResult staff, as well as the loss of benefits the program could provide to customers. In discussions with Staff, PGE has outlined a virtual installation process to support customer needs. The virtual installation process would leverage CLEAResult's existing program design and add steps to:

- Screen customers for virtual appointments
- Deliver thermostats to customers via sanitary delivery
- Support customers' installation of thermostats through virtual appointments

The above proposal requires no updates or changes to the language of Schedule 5. Given the novelty of this approach, PGE will track information on the success of the virtual installation and communicate findings with Staff in a timely manner.

To satisfy the requirements of OARs 860-022-0025(2), PGE provides the following response:

The changes do not increase, decrease, otherwise change existing rates, or impact revenues.

Please direct questions or comments regarding this filing 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](mailto:pge.opuc.filings@pgn.com)

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing & Tariffs

Enclosure

**SCHEDULE 5 (Continued)**

DELIVERY CHANNEL (Continued)

**RESIDENTIAL THERMOSTAT DIRECT INSTALLATION**

This delivery channel allows Customers who own a qualifying Ducted Heat Pump, Electric Forced Air Heating, and/or Central Air Conditioner but do not own a Qualified Thermostat to participate by receiving one from the Company. The Company will provide the following to Eligible Customers within the participation cap:

- For those Customers with a Ducted Heat Pump or Electric Forced Air, with or without Central Air Conditioner system, a connected thermostat that is installed, provisioned, and enrolled into PGE's demand response platform at no additional charge; or
- For those Customers with a Central Air Conditioner, for a fee up to \$150, a connected thermostat that is installed, provisioned, and enrolled into PGE's demand response platform.

PGE may, at a later date, apply a mechanism to recover labor and materials costs if the Customer opts-out of more than 50% of the event hours in an Event Season or the Customer removes the enrolled thermostat. The Customer may be charged up to the following:

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<b>Participation Year Customer Opts- Out</b>	<b>Customer Payback of Thermostat Labor &amp; Materials</b>
1	100%
2	80%
3	60%
4	40%
5	20%
6	0%

If, a Customer returns the working qualified thermostat within 90 days of installation, they are not charged for the cost of the thermostat and are only charged for the labor associated with installing the thermostat.