



Oregon

Kate Brown, Governor

Public Utility Commission

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December 15, 2020



BY EMAIL
PORTLAND GENERAL ELECTRIC COMPANY
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RE: Advice No. 20-37

At the public meeting on December 15, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1197. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser
Chief Administrative Law Judge
Public Utility Commission of Oregon
(503) 378-3098

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: December 15, 2020**

REGULAR **CONSENT** **EFFECTIVE DATE** January 1, 2021

DATE: November 25, 2020

TO: Public Utility Commission

FROM: Michelle Scala

THROUGH: Bryan Conway and John Crider **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1197/Advice No. 20-37)
Updates Schedule 128, Short Term Transition Adjustment.

STAFF RECOMMENDATION:

Approve Portland General Electric's (PGE or Company) proposed updates to Schedule 128, Short Term Transition Adjustment, as described in Advice No. 20-37, effective for service rendered on and after January 1, 2021.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve PGE's Advice No. 20-37, which updates its Schedule 128, Short Term Transition Adjustment, effective with service rendered on and after January 1, 2021.

Applicable Law

ORS 757.205 requires public utilities to file schedules showing all rates, tolls, and charges for service that have been established and are in force at the time. Pursuant to ORS 757.210, the Commission may approve tariff changes if they are deemed to be fair, just, and reasonable.

ORS 757.220 requires that any change in rates, tolls, charges, rules, or regulations be filed with the Commission at least 30 days before the effective date of the change.

OAR 860-022-0025 and OAR 860-022-0030 set forth the requirements for tariff filings naming increased rates. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules 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.

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.

ORS 757.600 to 757.689 authorize and regulate the provision of the "direct access" (Direct Access) options in Oregon. The Commission's rules implementing these statutes are set forth in OAR Chapter 860, Division 038. OAR 860-038-0160 concerns Direct Access transition charges and credits.

Analysis

Background

The purpose of instituting transition adjustment rates for Direct Access customers is to recover fixed generation costs from those who elect to substitute third-party energy sources for retail utility service. To recover said costs, each such customer will receive a transition credit or pay a transition charge. These transition adjustment rates are adjusted regularly to prevent net revenue shortfalls or windfalls arising from Direct Access.

The proposed Schedule 128 update in Advice No. 20-37 is the result of the updated price of electricity derived from the Company's most recent Net Variable Power Cost filing, Docket No. UE 377, and the 2021 forward market prices. The transition adjustment rates associated with a particular customer-schedule reflects the difference between the per-kWh weighted-average price that would be expected to be recovered applying current cost-of-service (COS) tariff energy charges to the respective schedule's projected total loads under the COS option, and the projected weighted average market cost. The respective schedule's load shape provides the weights used in estimating the average price and market cost.

Staff Review

The proposed updates to Schedule 128 affect only those customers electing to leave PGE's Cost of Service or choosing Direct Access during the annual election window that opened November 16, 2020, for service effective as of January 1, 2021. As filed, the proposed Schedule 128 adjustment rate will range from 1.864 cents per kWh to 3.821 cents per kWh, dependent on schedule. Compared with last year's January update to Schedule 128, this represents a slight increase in the Schedule 128 adjustment. Staff's year-to-year comparison of the COS energy prices and forecasted market values of energy saw slight increases in both input variables; however, the COS energy price increase was greater resulting in the overall increase to Schedule 128 prices.

As it is unknown how many customers will elect service through Schedule 128, the corresponding change in Company revenue is also unknown.

Staff corresponded directly with the Company to discuss Advice No. 20-37 and did not require any information requests as the Company's filing included all requisite documents to perform the analysis and review. Staff reviewed the filing, tariff schedule, and workpapers to ensure the proposed filing is accurately calculated and consistent with past Commission Orders. Staff further finds that all of the revised sheets are correct and consistent with PGE's current Net Variable Power Cost Update.¹

Conclusion

Staff finds that the updated rates in Schedule 128 are appropriately calculated, and recommends that the Commission approve the proposed tariff.

PROPOSED COMMISSION MOTION:

Approve PGE's proposed updates to Schedule 128, Short Term Transition Adjustment, as described in Advice No. 20-37, effective for service rendered on and after January 1, 2021.

¹ See Commission Order No. 20-428, Docket No. UE 377, PGE 2021 Annual Power Cost Update Tariff.

**SCHEDULE 128
SHORT-TERM TRANSITION ADJUSTMENT**

PURPOSE

The purpose of this Schedule is to calculate the Short-Term Transition Adjustment to reflect the results of the ongoing valuation under OAR 860-038-0140.

AVAILABLE

In all territory served by the Company.

APPLICABLE

To all Nonresidential Customers served who receive service at Daily pricing (other than Cost of Service) on Schedules 32, 38, 75, 83, 85, 89, 90, 91 or 95 or Direct Access service on Schedules 515, 532, 538, 549, 575, 583, 585, 589, 590, 591, 592 and 595. This Schedule is not applicable to Customers served on Schedules 485, 489, 490, 491, 492 and 495.

SHORT-TERM TRANSITION ADJUSTMENT

The Short-Term Transition Adjustment will reflect the difference between the Energy Charge(s) under the Cost of Service Option including Schedule 125 and the market price of power for the period of the adjustment applied to the load shape of the applicable schedule.

ANNUAL SHORT-TERM TRANSITION ADJUSTMENT RATE

For Customers who have made a service election other than Cost of Service in 2020, the Annual Short-Term Transition Adjustment Rate will be applied to their bills for service effective on and after January 1, 2021:

Schedule		Annual ¢ per kWh ⁽¹⁾
32		2.683
38		2.145
75	Secondary	2.120 ⁽²⁾
	Primary	2.080 ⁽²⁾
	Subtransmission	2.103 ⁽²⁾
83		2.645
85	Secondary	2.503
	Primary	2.430

(C)
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(I)
(I)

(1) Not applicable to Customers served on Cost of Service.
(2) Applicable only to the Baseline and Scheduled Maintenance Energy.

SCHEDULE 128 (Continued)

ANNUAL SHORT-TERM TRANSITION ADJUSTMENT RATE (Continued)

Schedule		Annual ¢ per kWh ⁽¹⁾	
89	Secondary	2.120	(I)
	Primary	2.080	
	Subtransmission	2.103	
90		1.864	
91		2.074	
95		2.074	
515		2.074	
532		2.683	
538		2.145	
549		3.821	
575	Secondary	2.120 ⁽²⁾	
	Primary	2.080 ⁽²⁾	
	Subtransmission	2.103 ⁽²⁾	
583		2.645	
585	Secondary	2.503	
	Primary	2.430	
589	Secondary	2.120	
	Primary	2.080	
	Subtransmission	2.103	
590		1.864	
591		2.074	
592		2.010	
595		2.074	(II)

(1) Not applicable to Customers served on Cost of Service.
(2) Applicable only to the Baseline and Scheduled Maintenance Energy.

ANNUAL SHORT-TERM TRANSITION ADJUSTMENT REVISIONS

The Annual Short-Term Transition Adjustment rate will be filed on November 15th (or the next business day if the 15th is a weekend or holiday) to be effective for service on and after January 1st of the next year. Indicative, non-binding estimates for the Annual Short-Term Transition Adjustment and Cost-of-Service Energy Prices will be posted by the Company by September 1 and then again one week prior to the filing date. These prices will be for informational purposes only and are not to be considered the adjustment rates.

SCHEDULE 128 (Concluded)

Second Quarter – April 1st Balance of Year Adjustment Rate ⁽¹⁾

Schedule	Annual ¢ per kWh ⁽²⁾	(C)
38	0.000	(C)
75	0.000 ⁽³⁾	
	0.000 ⁽³⁾	
	0.000 ⁽³⁾	
83	0.000	
85	0.000	
	0.000	
89	0.000	
	0.000	
	0.000	
90	0.000	
91	0.000	
95	0.000	
538	0.000	
575	0.000 ⁽³⁾	
	0.000 ⁽³⁾	
	0.000 ⁽³⁾	
583	0.000	
585	0.000	
	0.000	
589	0.000	
	0.000	
	0.000	
590	0.000	
591	0.000	
592	0.000	
595	0.000	(C)

(1) Applicable April 1, 2021 through December 31, 2021.
(2) Not applicable to Customers served on Cost of Service.
(3) Applicable only to the Baseline and Scheduled Maintenance Energy.