

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 29, 2021**

REGULAR CONSENT EFFECTIVE DATE July 1, 2021

DATE: June 21, 2021

TO: Public Utility Commission

FROM: Eric Shierman

THROUGH: Bryan Conway, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1273/Advice No. 21-15)
Update to Schedule 52 Nonresidential EV Charging Rebate Pilot.

STAFF RECOMMENDATION:

Staff recommends the Public Utility Commission of Oregon (Commission) approve Portland General Electric's (PGE or Company) filing as described in Advice No. 21-15, which updates PGE's Schedule 52 Nonresidential Electric Vehicle (EV) Charging Pilot.

DISCUSSION:

Issue

Whether the Commission should approve PGE's filing that requests to increase the Company's Schedule 52 Nonresidential EV Charging Pilot rebate by 100 percent. The request maintains the original budget but is expected to shorten the pilot by one year.

Applicable Rule

Under ORS 757.205(1):

Every public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules, which shall be open to public inspection, showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, or for any service in connection therewith or performed by any public utility controlled or operated by it.

The Commission may approve tariff changes if they are deemed fair, just, and reasonable. ORS 757.210.

Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025.

OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must 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.

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

Tariff filings to be effective on less than 30 days following notice of the change may be authorized with a waiver of less than statutory notice pursuant to ORS 757.220 and OAR 860-022-0020.

The Commission adopted PGE's Schedule 52 Nonresidential EV Charging rebate pilot at the December 15, 2020, public meeting.

Analysis

Background

On December 27, 2016, PGE first filed an application for TE programs as required by ORS 757.357. In that filing, PGE did not include proposals that were specifically targeted for commercial customers, such as workplace or fleet charging options. Parties negotiated a stipulation that included a charging option for industrial customers. On February 16, 2018, the Commission adopted this stipulation in Order No. 18-054, which stated that:

PGE agrees to propose a workplace charging and/or fleet charging program within one-year of the date of the Stipulation, conditioned on Commission approval of the Stipulation. The approximate total cost of the proposal will be \$1M. The program shall be open to both cost-of-service and direct access customers. The proposed \$1M results from a removal of \$1M from the PGE's proposed Education and Outreach budget in its application. PGE will also separately consider developing programs to

increase access to electricity as a transportation fuel at multifamily dwellings.¹

On February 15, 2019, PGE filed a business charging pilot. Staff found that the Company's proposed business charging pilot violated the terms of UM 1811's stipulation because the pilot exceeded the stipulated cost cap.² As a result, the parties agreed to modify the original stipulation and PGE agreed to revise its program proposal. The Commission adopted the amended stipulation on November 7, 2019, in Order No. 19-385. The amended stipulation removed capital costs from the business pilot program proposal, and directed PGE to propose a business charging pilot within one year of the date of the stipulation.³

On July 17, 2020, PGE filed Advice No. 20-19 in accordance with the stipulation. At the December 15, 2020, Public Meeting, the Commission approved Schedule 52.

Increase in Rebate

PGE proposes to increase Schedule 52's rebate from its current amount of \$500 per port to \$1,000 per port.

Schedule 52 has a fixed budget of \$1 million. In this update, PGE proposes to maintain a budget of \$1 million.⁴ Table 1 below shows how the new proposed budget accomplishes this.⁵ Doubling the rebate will reduce the number of participating ports from 1000 to 588 and reduce the number of years the pilot is expected to run by one year. This has the effect of reducing the amount of administrative costs as well.

¹ See Docket No. UM 1811, OPUC, Application for Transportation Electrification Programs, Order No. 18-054, February 16, 2018, Appendix A, p. 7.

² See Docket No. UM 1811, OPUC, Application for Transportation Electrification Programs, Order No. 19-385, p. 2.

³ *Id.* at 3.

⁴ See Docket No. ADV 1273, PGE, Advice No. 21-15, Schedule 52, Nonresidential Electric Vehicle Charging Rebate Pilot Update, May 27, 2021, p 2.

⁵ See Docket No. ADV 1155, PGE, Advice No. 20-19, Schedule 52, Nonresidential Electric Vehicle Charging Rebate Pilot, Attachment A, July 17, 2020, p 14.

Table 1: Change in Budget

	Current Budget	Proposed Budget
Ports	1000	588
Total Rebates	\$ 611,000	\$ 664,000
Education and Outreach	\$ 89,000	\$ 82,000
Labor Resources	\$ 225,000	\$ 179,000
Evaluation	\$ 75,000	\$ 75,000
Total Budget	\$ 1,000,000	\$ 1,000,000

This pilot is now expected to end in 2023 rather than 2024, as previously planned.

Reason for the Increase

PGE states this pilot was not intended as a stand-alone incentive.⁶ Rather, it was expected to be used in conjunction with a larger subsidy from ADV 1149's Transportation Electrification Line Extension Allowance (TLEA). The Company reports that since the Commission approved the pilot, no qualified customers have sought participation. In the Advice No. 21-15 filing, PGE states that \$500 is not enough assistance to move the market.

Staff finds that this tariff is fair, just and reasonable and in the public interest for two reasons. First, PGE has stated that there has not been customer participation so far in the pilot. Staff believes it is reasonable, given the short length of the initially approved pilot, to shorten the pilot and increase the rebate to increase the likelihood of gaining learnings from the pilot. Second, PGE's proposed revisions maintain the budget approved by the Commission.

Relation to other PGE Programs

Schedule 52 can be expected to work in conjunction with PGE's newly approved Schedule 56 Fleet Make-Ready Pilot where the significantly larger funding from Schedule 56 will have a more attributable impact on a customer's decision. Doubling the size of the Schedule 52 subsidy to offer more stand-alone incentive to projects applies more to public charging stations. For either project type, the per-port subsidy from Schedule 52 can primarily be seen as paying for data and an incentive for customers to adopt grid-integrated EVSE.

Conclusion

After review, Staff concludes that the revisions filed by PGE are appropriate and reflect

⁶ See Docket No. ADV 1273, PGE, Advice No. 21-15, Schedule 52, Nonresidential Electric Vehicle Charging Rebate Pilot Update, Order No. 18-054, May 27, 2021, p 1.

the tariff already approved by the Commission. PGE's requested increase in subsidy appears to be a reasonable response to market conditions, and the increase in the rebate remains in the existing budget approved by the Commission. Staff has reviewed the application and finds that PGE has met the requirements of statute and administrative review. Additionally, Staff has determined that the public is not harmed by this tariff revision.

PROPOSED COMMISSION MOTION:

Approve PGE's Advice No. 21-15, which updates PGE's Schedule 52 Nonresidential Electric Vehicle Charging Pilot.