

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT**

**PUBLIC MEETING DATE: November 16, 2021**

**REGULAR**  **CONSENT**  **EFFECTIVE DATE** November 17, 2021

**DATE:** November 8, 2021

**TO:** Public Utility Commission

**FROM:** Madison Bolton

**THROUGH:** Bryan Conway, Caroline Moore, and Scott Gibbens **SIGNED**

**SUBJECT:** PORTLAND GENERAL ELECTRIC:  
(Docket No. ADV 1321/Advice No. 21-24)  
Updates to Schedule 55 Green Energy Affinity Rider prior to the program's second tranche.

**STAFF RECOMMENDATION:**

Approve Portland General Electric's (PGE or Company) Advice No. 21-24, which revises language in PGE's Schedule 55 Green Energy Affinity Rider (GEAR) tariff, allowing PGE to manage subscription amounts, effective for service rendered on and after November 17, 2021.

**DISCUSSION:**

Issue

Whether the Oregon Public Utility Commission (OPUC or Commission) should approve PGE's proposed language revisions to Schedule 55, PGE's GEAR program.

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.

ORS 757.210 (1)(a) states a utility must show that a proposed rate or schedule of rates is fair, just, and reasonable. The Commission may authorize a rate or schedule of rates only if it is deemed to be fair, just, and reasonable.

ORS 757.220 requires 30 days' notice to changes to utility rates and schedules, except upon a finding of good cause shown.

OAR 860-022-0015 states that energy utilities must provide the Commission with at least 30 days' notice prior to the effective date for any change in rates, tolls, charges, rules, or regulations.

OAR 860-022-0025 illustrates energy utility requirements for filing tariffs or changes to rate schedules.

### Analysis

#### *Background*

PGE's Schedule 55 GEAR program is a voluntary renewable energy tariff (VRET). On October 14, 2021, the Company filed Advice No. 21-24, which proposes to modify tariff language in Schedule 55 to allow PGE to manage subscription amounts in the PGE Supply Option (PSO) for tranche 2 to ensure multiple customers can participate. Following feedback from Staff and eligible customers, PGE has included the following updates to this filing:

- A limit on customer capacity to 20 percent each when PGE anticipates enrollment demand exceeding 100 percent of the offered capacity;
- A process to reallocate any remaining capacity in the order of a customer's queue position;
- An update to the enrollment process where queue placement is based on any form of electronic timestamp;
- A clarification that PGE will publish the 20 percent capacity limit and the date when it will allocate any remaining capacity on the Company's website.

On September 22, 2021, representatives from PGE, Staff, and the Oregon Department of Justice (DOJ) participated in a teleconference meeting to discuss the Company's proposed Schedule 55 tariff update. Staff was initially concerned with the clarity of the revisions and requested adding more detailed, prescriptive language to clarify how capacity is capped, what triggers the capacity limits, and how to ensure the updates are non-discriminatory in all circumstances.

To alleviate these concerns, Staff suggested including what percent of the offered capacity must be exceeded for PGE to limit each customer's allowable capacity, as well as what percent of capacity each customer is limited to. Staff intended to make it clear that if the Company desires the ability to limit capacity, there must be a specified process in the tariff.

Following feedback from Staff and customers, PGE revised the filing to include a specified cap for customer capacity at 20 percent when PGE determines enrollment demand will exceed 100 percent of offered capacity. This process is consistent with Staff's suggestion for clarity. PGE also included a process to allocate any remaining capacity to customers in order of their queue position. Staff maintains that this allocation method appears to be fair while ensuring that all capacity is utilized. Staff believes the inclusion of this prescriptive and specific process is sufficient to prevent discriminatory operation of the program and a clearly defined process for customers to operate under.

Staff notes that the updates in the filing do not propose changes to or limits on the Customer Supply Option (CSO), other than the minor change to enrollment process language that allows placement in either the CSO or PSO queue to be determined by electronic timestamp.

#### Conclusion

The Commission should approve PGE's proposed tariff changes to Schedule 55 GEAR tariff. The changes are consistent with Staff's expectations for clarity and fairness to eligible customers and result in fair, just, and reasonable rates.

#### **PROPOSED COMMISSION MOTION:**

Approve PGE's proposed Advice No. 21-24, which revises language in PGE's Schedule 55 GEAR tariff, allowing PGE to manage subscription amounts, effective for service rendered on and after November 17, 2021.