



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

March 30, 2022

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. 22-04, 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 **May 18, 2022**:

Fifth Revision of Sheet No. 5-1
Fifth Revision of Sheet No. 5-2
Fourth Revision of Sheet No. 5-3
Fourth Revision of Sheet No. 5-4
First Revision of Sheet No. 5-5

PGE seeks to revise Schedule 5 Residential Direct Load Control Pilot to phase out the Direct Installation delivery channel, allow Direct Load Control Events to be called on weekends, increase the enrollment cap to 80,000 Residential customers, and extend the pilot through June 30, 2025.

PGE is seeking to remove the Direct Installation channel in order to ensure that the pilot will be cost-effective and create a better, more streamlined experience for customers. Direct Installation was created to encourage customers with dual season heating and cooling systems to enroll in the pilot. Despite continued efforts, these enrollments have been declining and PGE expects it can effectively enroll these customers through the Bring Your Own Thermostat delivery channel. PGE does not expect that removing the Direct Installation delivery channel will substantially impact customers.

PGE is seeking a three-year extension on this pilot in order to further study the ability of residential load to respond to demand response events, and PGE's proposed change to allow weekend events will allow the study of how many customers participate on these potentially critical days. Increasing the enrollment cap to 80,000 participations will allow PGE to continue to grow this flexible load resource during the pilot phase.

A redline of Schedule 5 is attached as a courtesy.

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

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosures

PGE Advice No. 22-04
Schedule 5 Residential Direct Load Control Pilot Update

Courtesy Redline

SCHEDULE 5 RESIDENTIAL DIRECT LOAD CONTROL PILOT

PURPOSE

This direct load control pilot is a demand response option for eligible Residential Customers. The direct load control pilot offers incentives to allow the Company to control thermostats during Direct Load Control Events while providing a customer override. The Company provides advance notice to participating Customers for Direct Load Control Events. The pilot is expected to be conducted from December 1, 2015 through June 30, 2025.

AVAILABLE

In all territory served by the Company.

APPLICABLE

This program is available to up to 6080,000 eligible Residential (Schedule 7) Customers that elect to enroll and participate in the pilot. Customers will remain on Schedule 7 and will be eligible for the incentives described in this schedule.

DEFINITIONS

Central Air Conditioning – Air conditioner tied into a central ducted forced air system.

Direct Load Control – A remotely controllable switch that allows the utility to operate an appliance, often by cycling. In terms of this pilot, direct load control allows the Company to change the set point or cycle the Customer's heating or cooling through the Customer's Qualified Thermostat to reduce the Customer's energy demand.

Direct Load Control Event – A period in which the Company will provide direct load control.

Ducted Heat Pump – Heat pump heating and cooling system hooked into a central ducted forced air system.

Electric Forced Air Heating – An electrical resistance heating system tied into a central ducted forced air system.

Event Notification – The Company will issue a notification of a Direct Load Control Event to participating Customers. ~~Participating Customers must choose at least one method for receipt of notification.~~ Notification methods may include email, text, auto-dialer phone call, on thermostat display screen, or via mobile app notification. Notification may also be available on the Company's website.

Event Season – The pilot has two event seasons: the Summer Event Season and the Winter Event Season.

SCHEDULE 5 (Continued)

DEFINITIONS (Continued)

Holidays – The following are holidays for purposes of the pilot: New Year's Day (January 1), 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 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.

Qualified Thermostat – Thermostats that are Company-approved and listed on PortlandGeneral.com.

Summer Event Season – The summer event season includes the successive calendar months June through September.

Winter Event Season – The winter event season includes the successive calendar months December through February.

ELIGIBILITY

Eligible Customers must have a Network Meter and connectivity to the internet. To participate in the Winter Event Season, the Customer must have a Ducted Heat Pump or Electric Forced Air Heating. To participate in the Summer Event Season, the Customer must have Central Air Conditioning or a Ducted Heat Pump.

DELIVERY CHANNEL

BRING YOUR OWN THERMOSTAT

This delivery channel allows the Customer to use their Qualified Thermostat, which must be connected to the internet and the heating or cooling system, all at the Customers' expense, to participate in Direct Load Control Events and receive incentives. Participating Customers receive a one-time payment of up to \$105 for signing up for this delivery channel. In addition, Customers receive \$25 for each Event Season they participate. A Customer participating in all Event Seasons receive up to \$155 for the first participating year and \$50 for additional years. Incentives are paid to the Customer with a check, bill credit, generic gift card, or credit **at time of purchase**. To receive payment for an Event Season, the Customer must participate in at least 50% of the event hours for which the Customer is eligible to participate in that Event Season.

SCHEDULE 5 (Continued)

DELIVERY CHANNEL (Continued)

RESIDENTIAL THERMOSTAT DIRECT INSTALLATION – NO NEW SERVICE

As of May 30, 2022, this delivery channel will be closed to new Customers. Existing Customers enrolled in the pilot through this channel will continue to be governed by the incentive and participation structure defined below until they have successfully participated in Direct Load Control events for five years, at which time, they will be eligible to receive seasonal incentives. Thermostat installations will be warranted for one year.

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:

Participation Year Customer Opts- Out	Customer Payback of Thermostat Labor & Materials
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.

SCHEDULE 5 (Continued)

DIRECT LOAD CONTROL EVENT

Direct Load Control Events occur for one to five hours. The Company may call two events per day but will not exceed five cumulative hours for the day. During Direct Load Control Events the Customer may allow the Company to control their thermostat for the duration of the event. The Customer has the option not to participate by overriding via the thermostat. The Company initiates Direct Load Control Events with Event Notification. The Company will call Direct Load Control Events only in the following months: December, January, February, June, July, August, and September. Direct Load Control Events will not be called on ~~weekends or~~ Holidays. Reasons for calling events may include but are not limited to: energy load forecasted to be in the top 1% of annual load hours, forecasted temperature above 90 or below 32, expected high generation heat rates and market power prices, and/or forecasted low or transitioning wind generation. The Company will call no more than 150 event hours per Event Season.

SPECIAL CONDITIONS

1. The Customer may enroll at any time but must participate for the minimum number of hours described in the delivery channel section.
2. The Customer may notify PGE they wish to terminate participation enrollment in the pilot at any time at the next regularly scheduled meter reading provided the Customer has provided the Company two weeks' notice prior to the meter read date. Absent the two week notice, the termination will occur with the subsequent meter reading date. PGE will unenroll the customer from the program within approximately one week of the request. The Customer may be charged additional costs described in the participating Customers enrolled delivery channel section.
3. The Customer may opt-out of any Direct Load Control Event; however, if the Customer does not participate in at least 50% of Direct Load Control Events in an Event Season, the Customer may be charged additional costs described in the participating Customer's enrolled delivery channel section.
4. If a participating Customer is eligible for an incentive, it will be provided ~~by check~~ at the next billing statement after the event season ends.
5. The Company will defer and seek recovery of all pilot costs not otherwise included in rates.
- ~~6. Customers on Schedule 6 are not eligible to participate in the direct load control pilot.~~
- ~~7.6.~~ 7.6. The Company is not responsible for any direct, consequential, incidental, punitive, exemplary, or indirect damages to the participating Customer or third parties that result from AC Cycling or changing the thermostat set point.
- ~~8.7.~~ 8.7. The Company shall have the right to select the cycling schedule and the percentage of the Customer's heating or cooling systems to cycle at any one time, up to 100%, at its sole discretion.

SCHEDULE 5 (Concluded)

SPECIAL CONDITIONS (Continued)

~~9.8.~~ The provisions of this schedule do not apply for any period that the Company interrupts the Customer's load for a system emergency or any other time that a Customer's service is interrupted by events outside the control of the Company. The provisions of this schedule will not affect the calculation or rate of the regular service associated with the Customer's Schedule 7 charges and associated charges.

~~10.9.~~ PGE has the right to remove a Customer from the pilot when good cause is shown including, but not limited to, for poor customer responsiveness, consistent customer non-participation in called events, or issues with customer equipment that impact customer's participation.

PERTAINING TO BRING YOUR OWN THERMOSTAT

1. Customers that reenroll in the program are not eligible for a second payment for signing up. A Customer continuing service at a new residence is not considered a new enrollment.
2. If the participating Customer moves to a different residence, the Customer may continue participation if the new residence meets the eligibility requirements.

PERTAINING TO RESIDENTIAL THERMOSTAT DIRECT INSTALLATION

1. Customers in the residential thermostat direct installation delivery channel are excluded from receiving thermostat incentives by the Energy Trust.
2. Customers ~~may will~~ be eligible for seasonal incentives after completion of ~~at least five to six~~ years of successful participation, as described in the delivery channel section, in Direct Load Control Events.

TERM

This pilot began December 1, 2015 and ends June 30, 202~~5~~2.

**SCHEDULE 5
RESIDENTIAL DIRECT LOAD CONTROL PILOT**

PURPOSE

This direct load control pilot is a demand response option for eligible Residential Customers. The direct load control pilot offers incentives to allow the Company to control thermostats during Direct Load Control Events while providing a customer override. The Company provides advance notice to participating Customers for Direct Load Control Events. The pilot is expected to be conducted from December 1, 2015 through June 30, 2025.

(C)

AVAILABLE

In all territory served by the Company.

APPLICABLE

This program is available to up to 80,000 eligible Residential (Schedule 7) Customers that elect to enroll and participate in the pilot. Customers will remain on Schedule 7 and will be eligible for the incentives described in this schedule.

(C)

DEFINITIONS

Central Air Conditioning – Air conditioner tied into a central ducted forced air system.

Direct Load Control – A remotely controllable switch that allows the utility to operate an appliance, often by cycling. In terms of this pilot, direct load control allows the Company to change the set point or cycle the Customer's heating or cooling through the Customer's Qualified Thermostat to reduce the Customer's energy demand.

Direct Load Control Event – A period in which the Company will provide direct load control.

Ducted Heat Pump – Heat pump heating and cooling system hooked into a central ducted forced air system.

Electric Forced Air Heating – An electrical resistance heating system tied into a central ducted forced air system.

Event Notification – The Company will issue a notification of a Direct Load Control Event to participating Customers. Notification methods may include email, text, auto-dialer phone call, on thermostat display screen, or via mobile app notification. Notification may also be available on the Company's website.

(C)

Event Season – The pilot has two event seasons: the Summer Event Season and the Winter Event Season.

SCHEDULE 5 (Continued)

DEFINITIONS (Continued)

Holidays – The following are holidays for purposes of the pilot: New Year's Day (January 1), 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 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.

Qualified Thermostat – Thermostats that are Company-approved and listed on PortlandGeneral.com.

Summer Event Season – The summer event season includes the successive calendar months June through September.

Winter Event Season – The winter event season includes the successive calendar months December through February.

ELIGIBILITY

Eligible Customers must have a Network Meter and connectivity to the internet. To participate in the Winter Event Season, the Customer must have a Ducted Heat Pump or Electric Forced Air Heating. To participate in the Summer Event Season, the Customer must have Central Air Conditioning or a Ducted Heat Pump.

DELIVERY CHANNEL

BRING YOUR OWN THERMOSTAT

This delivery channel allows the Customer to use their Qualified Thermostat, which must be connected to the internet and the heating or cooling system, all at the Customers' expense, to participate in Direct Load Control Events and receive incentives. Participating Customers receive a one-time payment of up to \$105 for signing up for this delivery channel. In addition, Customers receive \$25 for each Event Season they participate. A Customer participating in all Event Seasons receive up to \$155 for the first participating year and \$50 for additional years. Incentives are paid to the Customer with a check, bill credit, generic gift card, or credit. To receive payment for an Event Season, the Customer must participate in at least 50% of the event hours for which the Customer is eligible to participate in that Event Season.

(C)

SCHEDULE 5 (Continued)

DELIVERY CHANNEL (Continued)

RESIDENTIAL THERMOSTAT DIRECT INSTALLATION – NO NEW SERVICE

(C)

As of May 30, 2022, this delivery channel will be closed to new Customers. Existing Customers enrolled in the pilot through this channel will continue to be governed by the incentive and participation structure defined below until they have successfully participated in Direct Load Control events for five years, at which time, they will be eligible to receive seasonal incentives. Thermostat installations will be warranted for one year.

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(N)

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:

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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:

Participation Year Customer Opts- Out	Customer Payback of Thermostat Labor & Materials
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SCHEDULE 5 (Continued)

DIRECT LOAD CONTROL EVENT

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(C)

SPECIAL CONDITIONS

1. The Customer may enroll at any time but must participate for the minimum number of hours described in the delivery channel section.
2. The Customer may notify PGE they wish to terminate enrollment in the pilot at any time. PGE will unenroll the customer from the program within approximately one week of the request. The Customer may be charged additional costs described in the participating Customers enrolled delivery channel section.
3. The Customer may opt-out of any Direct Load Control Event; however, if the Customer does not participate in at least 50% of Direct Load Control Events in an Event Season, the Customer may be charged additional costs described in the participating Customer's enrolled delivery channel section.
4. If a participating Customer is eligible for an incentive, it will be provided at the next billing statement after the event season ends.
5. The Company will defer and seek recovery of all pilot costs not otherwise included in rates.
6. The Company is not responsible for any direct, consequential, incidental, punitive, exemplary, or indirect damages to the participating Customer or third parties that result from AC Cycling or changing the thermostat set point.
7. The Company shall have the right to select the cycling schedule and the percentage of the Customer's heating or cooling systems to cycle at any one time, up to 100%, at its sole discretion.

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SCHEDULE 5 (Concluded)

SPECIAL CONDITIONS (Continued)

8. The provisions of this schedule do not apply for any period that the Company interrupts the Customer's load for a system emergency or any other time that a Customer's service is interrupted by events outside the control of the Company. The provisions of this schedule will not affect the calculation or rate of the regular service associated with the Customer's Schedule 7 charges and associated charges. (T)
9. PGE has the right to remove a Customer from the pilot when good cause is shown including, but not limited to, for poor customer responsiveness, consistent customer non-participation in called events, or issues with customer equipment that impact customer's participation. (T)

PERTAINING TO BRING YOUR OWN THERMOSTAT

1. Customers that reenroll in the program are not eligible for a second payment for signing up. A Customer continuing service at a new residence is not considered a new enrollment.
2. If the participating Customer moves to a different residence, the Customer may continue participation if the new residence meets the eligibility requirements.

PERTAINING TO RESIDENTIAL THERMOSTAT DIRECT INSTALLATION

1. Customers in the residential thermostat direct installation delivery channel are excluded from receiving thermostat incentives by the Energy Trust.
2. Customers will be eligible for seasonal incentives after completion of five years of successful participation, as described in the delivery channel section, in Direct Load Control Events. (C)

TERM

This pilot began December 1, 2015 and ends June 30, 2025. (C)