



# Oregon

Kate Brown, Governor

**Public Utility Commission**

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August 23, 2022



Portland General Electric Company  
pge.opuc.filings@pgn.com

RE: Advice No. 22-10

At the public meeting on August 23, 2022, the Commission adopted Staff's recommendation in this matter docketed as ADV 1395. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

A handwritten signature in blue ink, appearing to read "Nolan Moser".

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

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: August 23, 2022**

**REGULAR**  **CONSENT**  **EFFECTIVE DATE** August 24, 2022

**DATE:** August 15, 2022

**TO:** Public Utility Commission

**FROM:** Eric Shierman

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

**SUBJECT:** PORTLAND GENERAL ELECTRIC:  
(Docket No. ADV 1395/Advice No. 22-10)  
Extension of Schedule 53 expiration and review of Electric Island Phase 2.

**STAFF RECOMMENDATION:**

Approve Portland General Electric's (PGE or Company) Advice No. 22-10, which extends the expiration of Schedule 53 Nonresidential Heavy-Duty Charging tariff and accept the Company's contract for Electric Island Phase 2.

**DISCUSSION:**

Issue

Whether the Oregon Public Utility Commission (OPUC or Commission) should approve PGE's Advice No. 22-10.

Applicable Law or Rule

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.

Order No. 21-195 approved PGE's program application which committed "contract negotiation" as a phase for Commission review.<sup>1</sup>

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<sup>1</sup> See Docket No. ADV 1239, PGE, Advice No. 21-03, February 10, 2021, Attachment A, p 3.

## Analysis

### *Background*

PGE's Schedule 53 is just over a year old. On February 2, 2021, PGE filed Advice No. 21-03 to seek Commission approval of a new Schedule 53 for heavy-duty electric vehicles (EV) with the intent of establishing a tariff for a joint project between PGE and Daimler Trucks North America (Daimler). This project on Swan Island in Portland, Oregon is called Electric Island. On June 15, 2021, the Commission approved Schedule 53 through UE 389.<sup>2</sup> PGE filed Advice No. 22-10 for Electric Island Phase 2 on May 12, 2022.

### *Expiration Extension*

PGE proposes to extend the expiration of Schedule 53 by nearly five years. The current expiration date is March 14, 2023. PGE seeks to extend this to December 31, 2027. Staff has reviewed the Company's application to ensure it meets the requirements of the Schedule when the Commission originally approved it in Order No. 21-195. Accordingly, Staff recommends that the Commission approve the Company's request to extend the schedule.

In its advice filing, PGE provides three reasons for this extension. First, the Company establishes that Megawatt Charging Standard (MCS) chargers will not be available before 2023. Second, PGE indicates it needs more time to study heavy-duty charging sited with grid edge technologies. Third, the Company requires additional time to sign on other program participants in its Heavy-Duty Electric Vehicle Charging program.

Staff finds two of these three reasons valid to recommend the Commission approve the extension of Schedule 53's expiration. First, Electric Island was designed to study MCS chargers, and extending the deadline may allow that to happen. Regarding the Company's third point, Schedule 53 is currently used by only one customer, Daimler. Other customers might improve PGE's learnings by increasing the sample size.

Staff finds the second point PGE provided—to allow more time for research—questionable. Extending the tariff is not necessarily required for the continued study of Electric Island. PGE is free to require Daimler or other future customers participating in this program to share data and other learnings long after Schedule 53 has expired. However, Staff still believes that the learnings that the Company will continue to gain during the extended time period is in line with the original Schedule 53, and therefore supports it.

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<sup>2</sup> See Order No. UE 389, OPUC, Order No. 21-195, June 15, 2021, p 1.

The extension of the tariff for the possibility of installing MCS chargers and signing up more program participants is sufficient for the Commission to approve the extension. The study of charging heavy-duty vehicles at speeds more than one MW is a central learning objective of this program. After Electric Island Phase 2, PGE's Heavy-Duty Electric Vehicle Charging program will have at least another \$5 million remaining in its budget for additional program participants.

#### *Electric Island Phase 2*

This second phase for Electric Island will build three things: additional electric vehicle supply equipment (EVSE) including some MCS chargers, onsite energy storage, and onsite solar generation. PGE forecasts Phase 2 to cost \$3.4 million.

Staff finds the Company has sufficiently disclosed the details of PGE's Phase 2 contract with Daimler to meet the commitment to Commission review that the Company described in their initial Schedule 53 application. PGE has provided Staff enough information to confirm that Phase 2 is consistent with the objectives of PGE's Heavy-Duty Electric Vehicle Charging program.

#### *Electric Island Update*

Through discovery, PGE has provided Staff with the latest forecast of expected energy deliveries to Electric Island. PGE's response is displayed in Table 1 below.<sup>3</sup>

*Table 1: Electric Island Sales Forecast*

<b>Year</b>	<b>Total Energy Deliveries in kWh</b>	<b>Annual Growth Percentage</b>
2022	130,000	
2023	300,000	130
2024	600,000	100
2025	800,000	30

Noting the expectation that the growth rate will decline in the next three years from 2022, Staff will be monitoring future PGE reporting of the actual sales to compare with this forecast. PGE's full response is appended to this memo as Attachment 1. Staff also expects annual information updates on progress through yearly TE Reports, as proposed in new Division 87 rules in Docket No. AR 654. Specifically, Staff requests detail on Phase 2 activities related to the building and integration of energy storage and onsite generation into Electric Island.

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<sup>3</sup> See Docket No. ADV 1395, PGE, Response to OPUC IR 13, July 6, 2022, p 1.

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August 15, 2022  
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Conclusion

The Commission should approve PGE's proposed extension of the expiration of Schedule 53 to December 31, 2027. The Commission should accept PGE's contract for Electric Island Phase 2 reporting.

**PROPOSED COMMISSION MOTION:**

Approve PGE's Advice No. 22-10, which extends the expiration of Schedule 53 Nonresidential Heavy-Duty Charging tariff and accept the Company's contract for Electric Island Phase 2.

CA1 – ADV 1395

July 6, 2022

To: Sarah Hall  
Public Utility Commission of Oregon

From: Rob Macfarlane  
Manager, Rates and Regulatory Affairs

Portland General Electric Company  
ADV 1395  
PGE Response to OPUC Information Request 013  
Dated June 15, 2022

**Request:**

What is the forecasted amount of kWh sold once Phase 2 is complete beginning in 2022 through 2025?

**Response:**

There is a wide possible range for this projection. The immediate 2022 load after completion of Phase 2 will likely be around 130,000 kWh, as stated in IR 012. Beyond that, the combination of the availability of higher-power chargers, an increase in medium/heavy duty vehicles on the road, and more EV traffic in general has the potential to increase this loading significantly.

High-level estimates are likely at the following levels:

2022 – 130,000 kWh  
2023 – 300,000 kWh  
2024 – 600, 000 kWh  
2025 – 800,000 kWh

**SCHEDULE 53 (Concluded)**

**SPECIAL CONDITIONS**

1. The Customer's charges for Electricity Service under any of the Company's Standard Service or Direct Access Service schedules are not changed or affected in any way by service under this schedule and are due and payable as specified in those schedules.
2. Prior to receiving service on this schedule, the Customer and the Company must enter into a written agreement, signed by the Customer.
3. Customers receiving service under this schedule will agree to a multi-year term for the agreement. Should the Customer terminate the agreement before the end of the term, the Customer will reimburse the Company for a portion of the capital investment as specified in the service agreement.

**TERM**

Effective March 15, 2021 through December 31, 2027.

(C)

Received  
Filing Center  
MAY 12 2022

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Advice No. 22-10  
Issued May 12, 2022  
Brett Sims, Vice President

Effective for service  
on and after ~~July 1, 2022~~  
August 24, 2022 mdb