

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 17, 2023**

REGULAR X **CONSENT** _____ **EFFECTIVE DATE** October 18, 2023

DATE: October 9, 2023

TO: Public Utility Commission

FROM: Joe Abraham

THROUGH: JP Batmale and Sarah Hall **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1536/Advice No. 23-14)
Updates Schedules 8, 52, and 56 for transportation electrification measures.

STAFF RECOMMENDATION:

Approve Portland General Electric's Advice No. 23-14, modifying Schedules 8, 52, and 56, contingent on the Commission's acceptance of the Company's 2023-2025 Transportation Electrification Plan.

DISCUSSION:

Issue

Whether the Commission should approve Portland General Electric's Advice No. 23-14, modifying Schedules 8, 52, and 56 to align with the Company's 2023-2025 Transportation Electrification Plan.

Applicable Rule or Law

ORS 757.357 requires electric companies to file a Transportation Electrification (TE) Plan for acceptance by the Commission every three years.

OAR 860-087-0020 provides the requirements for an electric company TE Plan.

Under ORS 757.210, the Commission may approve tariff changes if they are deemed to be fair, just, and reasonable. Tariff revisions may be made by filing revised sheets with

the information required under the Commission's administrative rules, including OAR 860-022-0025.

According to ORS 757.220 and OAR 860-022-0015, 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.

House Bill (HB) 2165 directs each electric company with 25,000 or more Oregon retail electricity consumers to collect, through monthly meter charges, an amount from each retail electricity consumer served through its the distribution system.¹ The total amounts collected under this section must be set to one quarter of one percent of the total revenues collected by the electric company from all retail electricity consumers.²

Funds collected through the monthly meter charge must be expended by the electric company to support and integrate TE, be consistent with a budget approved by the Commission, and made on elements contained within the electric company's TE Plan accepted by the Commission pursuant to ORS 757.357.³

An electric company must account separately for all revenues and expenditures related to these funds and report the revenues and expenditures on a schedule and in the manner prescribed by the Commission.⁴

An electric company must make reasonable efforts to spend not less than one-half of the amount collected through the monthly meter charge to support TE in underserved communities.⁵

Analysis

Background

In its Advice filing No. 23-14, Portland General Electric (PGE or Company) proposes updates to Schedules 8, 52, and 56 to allow implementation of the Company's proposed 2023-2025 TE Plan. Staff is recommending Commission acceptance of that Plan at the October 17, 2023, public meeting.

In this filing, PGE seeks to update tariffs for programs that the Commission has previously approved. In October 2020, the Commission adopted Staff's

¹ Oregon Laws 2021, chapter 95, section 2(2), *compiled as a note after* ORS 757.357 (2021).

² *Id.*

³ *Id.* at section 2(3).

⁴ *Id.* at section 2(4).

⁵ *Id.* at section 2(6).

recommendation to approve Advice No. 20-18, creating Schedule 8 and PGE's Residential Electric Vehicle (EV) Charging Pilot.⁶ Two months later, the Commission adopted Staff's recommendation to approve Advice No. 20-19, creating Schedule 52 and the Company's Nonresidential EV Charging Pilot.⁷ Finally, in May 2021 the Commission approved Advice No. 21-09, creating Schedule 56 and PGE's new Fleet Electrification Make-Ready Pilot.⁸

For context, PGE filed its first TE Plan on September 30, 2019. On September 8, 2022, the Commission adopted new Division 87 rules that prescribe the required elements of TE Plans.⁹ On March 23, 2023, PGE filed a budget for Monthly Meter Charge expenditures in calendar year 2023,¹⁰ which the Commission approved in Order No. 23-147 at the recommendation of Staff.¹¹ That Order approved PGE's Monthly Meter Charge budget and updates to the Company's Business and Multi-Family Make-Ready Solutions.

PGE received Commission approval to delay filing a 2023-2025 TE Plan until June 1, 2023.¹² PGE filed a draft version of the Plan on June 1, 2023, and a revised (final) TE Plan on August 25, 2023, for Commission acceptance.¹³

Summary of Proposed Schedule Changes

PGE's proposed updates to Schedule 8 reflect changes to the Company's Residential EV Charging Pilot, which provides a rebate for the installation of a home EV charger and rewards participation in a demand response program. Staff finds the Company's updates to Schedule 8 are consistent with the Residential EV Charging Pilot in the Company's TE Plan.

PGE's updates to Schedule 8 include removing the participation cap of 5,000 residential customers for the Company's Residential EV Charging Pilot. PGE also proposes to extend the Pilot enrollment deadline and Pilot duration by one year, to July 31, 2025 and December 31, 2025, respectively. The Company's updates reduce the one-time rebate for the purchase and installation of a qualified Level 2 EV charger from \$500 to \$300, but provide additional options for how the customer may receive the rebate. Finally, PGE clarifies how customers may opt-out of participating in managed charging

⁶ See Docket No. ADV 1151. <https://edocs.puc.state.or.us/efdocs/UBF/adv1151ubf113615.pdf>.

⁷ See Docket No. ADV 1155. <https://edocs.puc.state.or.us/efdocs/UBF/adv1155ubf114425.pdf>.

⁸ See Docket No. ADV 1261. <https://edocs.puc.state.or.us/efdocs/UBF/adv1261ubf14348.pdf>.

⁹ See Docket No. AR 654, OPUC, Order No. 22-336, September 8, 2022, p 1.

¹⁰ See Docket No. UM 2033, PGE, Oregon HB 2165 2023 Monthly Meter Charge Budget, March 2023.

¹¹ See Docket No. UM 2033, OPUC, Order No. 23-147.

¹² Order No. 23-034. <https://apps.puc.state.or.us/orders/2023ords/23-034.pdf>.

¹³ See Docket No. UM 2033.

events. Staff finds the pilot and these changes were not a source of controversy among stakeholders in Docket No. UM 2033.

PGE's proposed updates to Schedule 52 and 56 incorporate the Company's Business and Multi-Family Make-ready solutions in its 2023-2025 TE Plan. PGE's updates to both Schedule 52 and 56 adjust incentive amounts and include new qualification requirements for multi-family sites participating in both Schedules. The Company also indicates in its TE Plan that it will allow existing Business EV Charging rebates in Schedule 52 to sunset, and Schedule 52 will move forward as a make-ready measure.

PGE's updates to Schedule 52 clarify that eligible customers can receive up to \$36,000 in rebates for installing Level 2 electric vehicle supply equipment (EVSE). The Company's updates to Schedule 52 also provide further detail on rebates for the purchase of a qualified Level 2 EVSE installed at multi-family sites. Specifically, for eligible Non-Fleet customers who participate in Schedule 56, or the Company's Commercial EV Make-Ready Pilot, the Company will issue the Schedule 52 Multi-Family Level 2 EVSE rebate in two parts. The first \$1,000 in rebates per charger will be issued at installation and the remaining \$1,300 will be given after five years if the property owner maintains rates within ten percent of Schedule 50.

The Company's updates to Schedule 56 include important details and distinctions for Fleet- and Non-Fleet customers. Eligible Non-Fleet customers must install a minimum of eight Level 2 EVSE ports at existing commercial, workplace, or multi-family sites, and are intended to be used by EVs owned or leased by residential customers. PGE's updates to Schedule 56 also clarify a revised incentive for Fleet customers and a new incentive for Non-Fleet customers. Staff finds PGE's updates to Schedule 52 and 56 are consistent with its Business and Multi-Family Make-ready solutions in its 2023-2025 TE Plan.

Finally, PGE's updates to both Schedule 52 and 56 define several new terms (e.g., "Non-Fleet customer") as well as clarify goals, customer eligibility, and enrollment periods. The Company also includes several updates to "special conditions" in Schedule 56 that clarify customer responsibilities and requirements.

Stakeholder Engagement and Feedback

Stakeholders provided significant input and comments in Docket No. UM 2033 on PGE's draft and final 2023-2025 TE Plans. Staff broadly summarizes these stakeholder comments and the Company's response in its memo.¹⁴

¹⁴ Staff memo for the October 17, 2023 Public Meeting.
<https://edocs.puc.state.or.us/efdocs/HAU/um2033hau152528.pdf>.

Relative to the Schedules in this filing, stakeholders are concerned that incentivized EVSE at multi-family sites without utility ownership may leave residents vulnerable to higher and unregulated charging costs. In response to stakeholder concerns, PGE proposed in its final TE Plan a two-part Multi-Family Level 2 EVSE rebate in Schedule 52, with the second of the two-part rebate aligned with Schedule 50. On September 29, 2023, stakeholders concerned about these risks posted additional comments to Docket No. UM 2033 expressing support for PGE's modifications to its final TE plan in response to their earlier comments.¹⁵

Conclusion

Staff finds PGE's modifications to Schedules 8, 52, and 56 reasonable and consistent with the Company's final 2023-2025 TE Plan. Staff recommends the Commission approve these modifications contingent on acceptance of the Company's TE Plan.

PROPOSED COMMISSION MOTION:

Approve Portland General Electric's Advice No. 23-14, modifying Schedules 8, 52, and 56, contingent on the Commission's acceptance of the Company's 2023-2025 Transportation Electrification Plan.

¹⁵ See Docket No. UM 2033.