



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

August 19, 2021

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street, S.E.  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: UM 1708 Residential Flexible Pricing Pilot and Direct Load Control  
Thermostat Pilot Program Costs in Compliance with Order 19-313**

Portland General Electric Company (PGE) submits this work paper pursuant to Public Utility Commission of Oregon (OPUC or Commission) Order No. 19-313, filed in OPUC Docket No. UM 1708, that directs PGE to submit program costs for Residential Flexible Pricing Pilot (FLEX) and Direct Load Control Thermostat pilot (DLCT) to Staff for review of prudence.

These program costs are to be submitted on a timeline that is no less than 90 days prior to filing to adjust tariff rates for PGE's Rate Schedule 135 (Demand Response Cost Recovery Mechanism). PGE intends to file an update to Schedule 135 prices, effective January 1, 2022, to recover the costs to operate Schedules 5 (DLCT) and 6 (FLEX).

Attachment A is the work paper that provides cost detail for both FLEX and DLCT from 2015, when they both launched, to June 2021. FLEX Pilot costs are in Accounting Work Orders (AWOs) 1000004385, 1000004386, 4000011441 and 1000008181. DLCT Pilot costs are in AWOs 1000004433, 1000007300, 1000008721, 1000004434 and 3000001258. While the Commission approved PGE's application for deferred accounting in UM 1708, Attachment A is required to enable the OPUC's prudence review prior to deferral amortization. As of June 2021, the balance to be amortized for both FLEX and DLCT is \$1.8 million.

Attachment A contains confidential information and is subject to Protective Order No. 14-402. The work paper is not included in this filing and will be submitted electronically, and password protected.

Please direct any questions 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](mailto:pge.opuc.filings@pgn.com)

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing & Tariffs

Enclosure(s)

UM 1708

Attachment A

Confidential and Subject to Protective Order No. 14-402  
Provided in Electronic Format Only  
Program Costs for FLEX and DLCT Pilots  
from 2015-2021 YTD