March 22, 2024

Public Utility Commission of Oregon Attention: Filing Center P.O. Box 1088 Salem, OR 97308-1088

RE: Docket No. UM 2033 – PGE TE Plan, EV Ready Affordable Housing Grants

Dear Filing Center,

Portland General Electric Company (PGE or the Company) submits this filing to notify Public Utility Commission of Oregon (OPUC or Commission) Staff and stakeholders in UM 2033 of a reallocation of funds from the Company's 2022 HB 2165 TE Monthly Meter Charge (MMC) budget. ORS 757.357 requires electric companies with 25,000 or more retail customers to collect the MMC and expend the resulting funds to support and integrate transportation electrification (TE), consistent with a budget approved by the Commission.<sup>1</sup>

The Commission approved PGE's 2022 MMC budget with Order No. 22-381<sup>2</sup>, including a \$1,000,000 allocation to fund an EV Ready Affordable Housing Grant program. This was envisioned as a one-time allocation to reflect newly adopted state requirements for multifamily affordable housing developments to install make-ready infrastructure to accommodate electric vehicle (EV) chargers in their parking facilities. The grants were expected to target already-permitted and financed projects that were not yet constructed and had not budgeted funds to cover the additional make-ready costs.

PGE has conducted outreach to potential grant recipients but has thus far received no applications for grants under this program. After consulting with Staff and the City of Portland (the City had initially suggested the program to PGE), PGE has determined that MMC funds budgeted to the EV Ready Affordable Housing Grant program could better support installation of EV charging facilities at multifamily housing sites by being reallocated to the Company's Business EV Charging Rebates program, which was originally approved by the Commission in 2020<sup>3</sup> and expanded as part of PGE's 2022 MMC budget. This reallocation will continue to serve the original purpose of supporting future implementation of EV charging at affordable housing, but within a broader program that has proven effective and will otherwise soon be fully reserved.

OAR Chapter 860, Division 87 specifies that the MMC budget must be included in the overall TE budget, within electric utilities' transportation electrification plans. Division 87 also specifies that electric companies must file TE Plan updates to reflect material changes to their plan, which the rule defines as new TE program or infrastructure applications, or program or infrastructure measure changes that require new incremental ratepayer dollars.

This reallocation of funds within PGE's MMC budget supports the purpose of the original budget allocation, will require no additional ratepayer dollars, and does not create a new program or infrastructure

<sup>&</sup>lt;sup>1</sup> ORS 757.357 Oregon Laws 2021, Chapter 95, Section 2

<sup>&</sup>lt;sup>2</sup> OPUC Order No. 22-381, retrieved from https://apps.puc.state.or.us/orders/2022ords/22-381.pdf

<sup>&</sup>lt;sup>3</sup> OPUC Advice No. 20-19, retrieved from <a href="https://edocs.puc.state.or.us/efdocs/UAA/uaa15947.pdf">https://edocs.puc.state.or.us/efdocs/UAA/uaa15947.pdf</a>

<sup>&</sup>lt;sup>4</sup> OAR Chapter 860, Division 87 Oregon Secretary of State Administrative Rules

UM 2033 PGE's Notice of Reallocation of Funds Page 2

measure. Thus, PGE does not view this as a material change to PGE's TE Plan that requires Commission action. The Company will reflect this MMC budget adjustment in its annual TE Plan Report, which is due to the Commission on or before May 1, 2024.

For any questions or comments regarding this filing, please contact Steven Corson at (503) 550-0857. Please direct any communications related to this filing to the following email address: <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a>

Sincerely,

/s/ Ríley Peck

Riley Peck Senior Manager, Regulatory Strategy & Engagement

Cc: Sarah Hall Eric Shierman