



UM 2141 – PGE Flexible Load Plan Opportunity for public comment

March 2, 2021

The Oregon Public Utility Commission (PUC or Commission) seeks public comment on Portland General Electric's (PGE) Flexible Load Plan, filed in Docket No. UM 2141 on December 23, 2020.

In particular, the PUC seeks comments on PGE's proposal to change the way the Company presents its demand response/flexible load pilots and programs to the Commission, as described in the Flexible Load Plan's executive summary. Currently, the Commission reviews separate deferral authorization requests and reporting for each of PGE's pilots on separate schedules. Under the proposal, PGE would consolidate the Company's various demand response and flexible load activities into a single portfolio and present the whole portfolio to the Commission in a multi-year plan that includes budget, cost recovery, and reporting.

Comments on PGE's proposal to move to portfolio-level planning for flexible load activities must be emailed to puc.filingcenter@state.or.us by March 26, 2021.

Background

PGE filed the Flexible Load Plan with the PUC on December 23, 2020 in Docket No. UM 2141. PGE held two public information sessions on February 11 and February 18, 2021. In those sessions, PGE explained that the Flexible Load Plan includes one proposal: to migrate to portfolio-level planning, budgeting, cost recovery and reporting for the Company's flexible load activities. If the Commission accepts the proposal, PGE will subsequently file a portfolio-level multi-year plan for approval.

PGE described the Flexible Load Plan as a transparency filing that presents a comprehensive report of activity that PGE is undertaking to meet the Company's demand response targets set forth in its Integrated Resource Plan. While the PUC welcomes public comment on any part of PGE's Flexible Load Plan now, there will be future opportunities to comment on specific demand response/flexible load pilot activity, planned expenditures, cost recovery, and cost effectiveness, as described below.

Docket schedule

March 26, 2021: Public comment due on proposed transition to portfolio-level flexible load planning

April 16, 2021: PGE reply comments due

May 18, 2021: Flexible Load Plan presented to Commission for acceptance at regular public meeting

Q3 2021: PGE file multi-year portfolio-level plan and budget for Commission approval (see below)

Future opportunities to comment

Flexible Load multi-year plan:

If the Commission accepts the Flexible Load Plan, PGE will then file a multi-year plan and budget for which it will seek Commission approval. PGE expects to file the multi-year plan in Q3 2021.

PGE states that the multi-year plan will describe PGE's flexible load programs, pilots, and

demonstrations, including planned activities, forecasted savings, and forecasted expenditures. The multi-year plan will also propose a cost recovery mechanism. The PUC will seek public comment on all elements of the multi-year plan prior to its review by the Commission.

Adjustments to current pilots:

Prior to approval of the Flexible Load multi-year plan, PGE may seek approval from the Commission to continue or modify current demand response/flexible load pilots. At a minimum, PGE will submit a proposal on or before April 15, 2021, to adjust activity for its commercial smart thermostat pilot. Any revisions to current pilots that PGE files before submitting the multi-year plan will be noticed to the UM 2141 service list.

Smart Grid Testbed Phase II proposal:

PGE expects to file a proposal to extend and expand the flexible load demonstration work of the Smart Grid Testbed in summer 2021. The PUC will seek public comment on that proposal. Any filings rated to the Testbed will be noticed to the UM 2141 service list.

Cost-effectiveness methodology:

In the Flexible Load Plan, PGE includes a chapter on current cost-effectiveness methodology and ideas for how the methodology might change in the future to value the multiple benefits of flexible load. No changes to cost-effectiveness methodology are being considered by the Commission now. The PUC may open a future investigation into the methodology for calculating cost-effectiveness of demand response/flexible load activity for all utilities. If that happens, the UM 2141 service list will be notified and invited to provide comments.

Other planning efforts:

PGE maintains separate planning efforts for its Integrated Resource Plan, Transportation Electrification Plan (Docket No. UM 2033) and Distribution System Plan (Docket No. UM 2005). These planning efforts may include flexible load elements, and present additional opportunities for public comment. Note that the Smart Grid Report has been temporarily suspended, with some aspects of it to be incorporated into the Distribution System Plan.

To receive future notices related to PGE's Flexible Load Plan and related activities, please email puc.hearings@state.or.us asking to be added to the UM 2141 service list.

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