



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

April 23, 2021

Via Electronic Filing

Public Utility Commission of Oregon
P. O. Box 1088
Salem, OR 97308-1088

RE: UM 1938 Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with Transportation Electrification Pilots

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with PGE's Transportation Electrification Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UE 335 and UM 1938 service lists.

Thank you for your assistance in this matter. If you have any questions or require further information, please call me at (503) 464-7488.

Please direct all formal correspondence, questions, or requests to the following e-mail address: pge.opuc.filings@pgn.com.

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

JF/np
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1938

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Reauthorization of Deferred
Accounting of Costs Associated with the
Transportation Electrification Pilots.

**PORTLAND GENERAL ELECTRIC
COMPANY'S REQUEST FOR
DEFERRAL REAUTHORIZATION**

Pursuant to ORS 757.259 and OAR 860-027-0300, Portland General Electric Company (PGE) hereby respectfully requests authorization to continue to defer the costs and revenues associated with the Transportation Electrification Pilots (TE Pilots or Pilots) approved by Public Utility Commission of Oregon (Commission or OPUC) Order No. 18-054 and later modified by Order No. 19-385 (Docket No. UM 1811). These Pilots are aimed at advancing state policy to accelerate transportation electrification in Oregon. We request this reauthorization to be effective as of April 23, 2021.

I. Deferral History

In alignment with the State of Oregon's policy direction of electrification, PGE is pursuing efforts as a company to decarbonize its energy supply, increase electricity as a share of total energy use, and enhance operational performance and efficiency. PGE's TE Pilots not only comply with Oregon's policy direction, but also support PGE's decarbonization, electrification, and performance imperatives.

In accordance with Commission Order No. 18-054 and OAR 860-087-0030, PGE has launched three TE Pilots: Electric Avenue (10 years), TriMet Mass Transit (10 years), and

Education and Outreach (3 years), and will incur incremental costs, including cost related to evaluations, for the Pilots. The details of the Pilots are discussed in PGE's supplemental application for transportation electrification programs filed March 15, 2017 (Docket No. UM 1811) and are summarized as follows:

- Electric Avenue Pilot (including procurement, software, engineering studies, outreach, maintenance and payment process expenses);
- Support of Tri-Met Mass Transit (including procurement, management and maintenance expenses);
- Education and Outreach pilot expenses (including specialized trainings, builders and developer outreach, ride and drive events, and regional market transformation activities); and
- Pilot Evaluation costs.

Due to the COVID-19 pandemic, many of the Education and Outreach events were cancelled as in-person activities were limited. Commission Order Nos. 19-385 and 18-054 both limit the Education and Outreach activities to three years ending in April 2021. PGE is currently seeking a one-year extension of those activities while staying within the maximum allowable cost limit of \$480,000. Pilot activities for 2020 as well as the planned activities for 2021 are described in Attachment A.

To address these Pilots' costs, PGE has filed and received authorization for deferred accounting as shown in Table 1, below.

**Table 1
UM 1938 Authorizations**

Filing Date	Deferral Period	Order No.
4/23/2018	4/23/2018 – 4/22/2019	20-381
4/23/2019	4/23/2019 – 4/22/2020	20-381
2/21/2020	Supplemental filing to clarify deferral	20-381
4/23/2020	4/23/2020 – 4/22/2021	20-381

II. OAR 860-027-0300 Requirements

The following is provided pursuant to OAR 860-027-0300:

a. Description of Amounts

PGE proposes that the deferral continue for 10 years and is capped at a maximum allowable cost of \$3.8 million as approved by Commission Order No. 19-385, and listed in Table 1, below.

**Table 1
Maximum Allowable Costs (\$000)**

Pilot	Amount
TriMet Electric Mass Transit Pilot (net)	\$0
Education and Outreach Pilot	\$480
Electric Avenue Pilot	\$2,787
Evaluations	\$580
Total	\$3,847

b. Reasons for Deferral

See Deferral History. The granting of this Application will minimize the frequency of rate changes and/or match appropriately the costs borne by and benefits received by customers. As PGE presented in the UM 1811 Transportation Electrification workshops, approval of a cost-recovery mechanism is necessary to proceed with the Pilots because the costs are not included in customer prices or any other recovery mechanism.

c. Proposed Accounting for Recording Amounts Deferred.

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets) and credit the appropriate FERC expense accounts. When specific identification of the particular source of the regulatory asset cannot be reasonably made, then FERC account 407.4 (Regulatory Credits) will be credited. In the absence of a deferred accounting order, the costs would be debited to the appropriate cost accounts.

d. Estimate of Amounts to be Recorded for the Next 12 months.

PGE estimates the net costs of the Pilots to be approximately \$0.3 million for the next 12 months and are included in the calendar year forecasts as presented in Table 2, below.

Table 2
Forecasted Pilot Costs

Pilot	2018 Actual	2019 Actual	2020 Actual	2021 Forecast	Total
Electric Avenue Pilot	\$2,966	\$(333)	\$538	\$287,207	\$290,378
TriMet	\$-	\$-	\$-	\$(151,571)	\$(151,571)
Education and Outreach	\$46,479	\$69,438	155,619	\$150,853	\$422,389
Evaluation	\$40,783	\$83,626	\$-	\$88,282	\$212,691
Total	\$90,229	\$152,731	156,157	374,771	\$773,888

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with Notice are attached to the application as Attachment B. In compliance with the provisions of 860-027-0300(6), PGE is serving Notice of Application on the UM 1938 and UE 335 service lists.

III. Summary of Filing Conditions.

a. Earnings Review

Cost recovery associated with the Pilots will be subject to an earnings review in accordance with ORS 757.259(5).

b. Prudence Review

PGE will submit Pilot evaluation reports that will provide detailed cost summaries. A prudence review can also be performed during the Pilots' operations.

c. Sharing

All prudently incurred costs and benefits would be collected or refunded from or to customers with no sharing mechanism.

d. Rate Spread/Rate Design

Costs will be allocated using the applicable rate schedule's forecasted energy based on an equal percent of revenues applied on a cents per kWh basis to each applicable rate schedule.

e. Three percent test (ORS 757.259(6))

The amortization of the Pilot's deferred costs will be subject to the three percent test in accordance with the ORS 757.259(7) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

IV. PGE Contacts

The authorized addresses to receive notices and communications in respect to this

Application are:

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In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Jaki Ferchland, Manager Revenue Requirement
E-mail: jacquelyn.ferchland@pgn.com

V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the costs and revenues associated with the Pilots.

DATED this April 23, 2021.

Respectfully Submitted,

/s/ Jaki Ferchland

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Attachment A

Implementation Detail for Transportation Electrification Pilots

Electric Avenue Pilot

Electric Avenue Network 2020 Activity

Site Design and Development

PGE completed all remaining site commissioning activities in Q1, 2020 and opened all locations to the public except for Beaverton. In the early Q2, 2020, PGE completed minor parking lot reconfiguration and repaving activities in Beaverton and opened the last site to the public shortly thereafter.

Operations and Maintenance

PGE maintained software and cellular service agreements with Greenlots and a service level agreement with equipment manufacturer BTCPower. PGE also continued to use internal operations and maintenance resources to conduct remote monitoring and periodic on-site inspections in coordination with a third-party vendor for routine maintenance and emergency repairs. Finally, PGE continued its engagement with a contract employee to support repair coordinator and field inspections of equipment. PGE also did not spend as much as anticipated on maintenance service level agreements due to warranty issues (servicing of equipment was covered under warranty instead of service level agreements).

Education and Outreach

Electric Avenue grand openings are an opportunity to raise awareness of the new charging infrastructure within the local communities, which we leverage to increase understanding of our service territory through various communication channels. Due to COVID and the timing of the Electric Avenue openings and activations, we did not execute on any public events in support of the openings in 2020.

Electric Avenue Network Expected 2021 Activity

Operations and Maintenance

PGE plans to continue maintaining software and cellular service agreements with Greenlots and may procure a service level agreement from an alternative provider. PGE also plans to continue to use internal operations and maintenance resources to conduct remote monitoring and periodic on-site inspections in coordination with third party vendors for routine maintenance and emergency repairs. PGE plans to continue to use a contract employee to support repair coordinator and field inspections of equipment and may explore hiring additional PGE staff to support.

Marketing

PGE plans to conduct a marketing campaign to increase site utilization.

TriMet Mass Transit Pilot

In 2018, OPUC approved a pilot with TriMet whereby PGE owns, operates, and maintains high-powered charging infrastructure for TriMet's first all-electric bus line. Throughout 2018, PGE worked closely with TriMet to design, install, commission, and operate the proposed electric bus charging infrastructure. PGE provided guidance on the most flexible and cost-effective methods to connect the charging infrastructure at Sunset Transit Center and Merlo Garage to PGE's distribution grid, provided insight into site layout and construction, and held regular meetings with TriMet and other construction contractors.

TriMet Mass Transit 2.0 2020 Activity

PGE completed construction of the infrastructure in 2019 and continues to focus on infrastructure operations and maintenance. Though COVID impacted ridership of TriMet's bus lines, we continued to service the equipment to ensure continual operations of buses.

Operations and Maintenance

PGE internal operations and maintenance resources continued conducting remote monitoring and periodic inspections in coordination with a third-party vendor for routine maintenance and emergency repairs. PGE did not defer any expenses related to TriMet Mass Transit Pilot Activities.

TriMet Mass Transit 2.0 2021 Expected Activity

PGE plans to continue remote monitoring and periodic inspection but does not anticipate incurring any expenses that will be deferred in 2021 or future program years.

Education and Outreach Detail

PGE has focused its Education and Outreach in two areas: Market Transformation and Technical Assistance/Commercial Outreach. Market Transformation is aimed at redefining electric fuel for our customers and the vehicle sales community. Technical Assistance/Commercial Outreach is aimed at supporting business customers with tools they need to invest in EVs for their fleet or charging infrastructure for their employees/patrons.

Market Transformation 2020 Activity

Portland International Auto Show

PGE partnered with Forth, PacifiCorp, Clark PUD, and Chargeway to sponsor the Electric Avenue EV display at the 2020 Portland International Auto Show. The 2021 Electric Avenue display featured three EV's, a vehicle wall display, an information booth, Chargeway Beacons, Information Towers, and various examples of public charging infrastructure, both level 2 charging infrastructure (approximately 7 kW) and DC Quick Charging (approximately 50 kW). The booth was staffed with volunteers from PGE, PaciCorp, Forth and Clark PUD. The 2021 Electric Avenue display also included an EV ride and drive, which was a first for the event. There were 196 rides over the course of the auto show.

EV Symposium (EVS) 33

In June 2021, the 33rd edition of EVS intended to bring together policy makers, industry experts and academics to explore and analyze the latest innovations in transportation electrification at the Oregon Convention Center. PGE recognized its value in bringing together, utilities, nonprofits, government, and auto manufacturers to discuss issues related to the mass adoption and deployment of EVs, and its supporting infrastructure. PGE was also planning to sponsor Public Day, a family-friendly day-long event where attendees can test drive some of the latest EVs, including cars, trucks, bikes, and scooters. However, EVS 33 was canceled due to the COVID-19 pandemic.

Chargeway

PGE is worked with Chargeway to engage with local dealerships to provide tools and training to enable dealers to more accurately and comfortably explain electricity as a fuel. This is accomplished primarily through the placement of the physical Chargeway beacons. Initially beacons were placed at Wentworth's Wilsonville Chevrolet, Kuni BMW & Platt Auto. The response has overall been positive to the placement and utilization of the Chargeway Beacon. Wilsonville Chevrolet has reported a significant increase in the number of EV's they have been able to sell with the aid of the Chargeway platform.

We expanded the number of dealerships with a Chargeway beacon to include three additional dealerships: Carr Nissan, Audi Wilsonville, and Dick's Hillsboro Hyundai. Our goal was to expand to additional Original Equipment Manufacturers and price points and to engage with dealerships who have EV models on the lot and have a commitment to vehicle electrification at an OEM and dealer level.

Market Transformation Expected Activity 2021

Education and Awareness campaign

PGE will launch an Education and Awareness campaign planned for Q3, 2021 intended to address common EV barriers: cost, range, and availability of charging. We will also raise awareness of key EV benefits: 1) that EV's are clean, less expensive to own and operate, and have better performance and features; and 2) the availability of charging both at home and away. This will be a multi-channel campaign, aimed at increasing customers awareness of EV benefits and increase consideration of electric transportation as a future vehicle choice.

National Drive Electric Week (NDEW)

PGE will look to partner with Oregon Electric Vehicles Association and the Oregon Auto Dealers association again on an NDEW event in September 2021. The exact format of the event is to be decided and will largely be dependent on the status of the pandemic and our ability to hold in-person events in the fall.

Dealer Engagement

PGE is planning to expand partnerships with the Oregon Auto Dealers Association, and Chargeway to engage local dealerships on providing tools and resources for EV education of salespeople. The goal of this training is to create consistency on how salespeople explain electricity as a fuel, available incentives, and resources related to utility EV programs. We conducted roundtables and several individual meetings with local dealerships to discuss their needs as it relates to EV education, common questions and challenges, and what methodology best suits the dealer model. The training we developed is a computer-based training with specific training modules explaining:

- Electric Fuel
- How Charging Works
- Costs and Incentives
- Links and Resources

We have implemented this training at our six partner dealerships and are working with our partners to expand the training to dealerships spanning our service territory and diversified by brand and price point.

Technical Assistance/Commercial 2020 Activity

In 2020, we continued to offer EV charging consultations, providing technical analysis, advice, and recommendations to businesses and fleets. Business charging consultations slowed down due to the COVID-19 pandemic, but there was still a strong interest in fleet electrification. Government agencies, specifically, were motivated to reduce fleet emissions and have reached out to PGE for help in planning their fleet EV projects. We partnered with a consultant to conduct fleet electrification assessments for five of the largest fleets in our service area. These assessments focused on recommending vehicle types to electrify, cost of ownership and savings, as well as electric vehicle charging. Through these assessments, we analyzed almost 7,000 vehicles and found that over 50% could feasibly be replaced with EVs in the next few years. Data from these assessments will help with EV load forecasts, to ensure seamless integration of EV charging into the grid.

Technical Assistance/Commercial 2021 Expected Activity

In 2021, we will continue to offer fleet planning services including EV feasibility assessments, charging analysis, and cost of ownership analysis. We plan on implementing a third-party-hosted Total Cost of Ownership tool on our website for fleet customers to use. Customers that use the tool will be contacted by PGE for follow-up, and the vehicle data they enter will be used for system planning. We will also be conducting site assessments and have recently upgraded the program to include preliminary site designs and cost estimates for customers to use when budgeting and planning their projects. Additionally, we will be working with commercial vehicle dealerships to help market our technical services to more fleets.

Attachment B

Notice of Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with Transportation Electrification Pilots

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1938

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Reauthorization of Deferred
Accounting of Costs Associated with the
Transportation Electrification Pilots.

**PORTLAND GENERAL ELECTRIC
COMPANY'S NOTICE OF REQUEST
FOR DEFERRAL
REAUTHORIZATION**

On April 23, 2021, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission) for an Order reauthorizing deferral of costs and revenues associated with Transportation Electrification Pilots

Approval for deferred accounting treatment will not authorize a change in PGE's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Persons who wish to obtain a copy of PGE's application will be able to access it on the Commission website.

Any person who wishes to submit written comments to the Commission on PGE's application must do so no later than May 23, 2021.

Dated this April 23, 2021.

/s/ Jaki Ferchland
Jaki Ferchland
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Application to Reauthorize Deferred Accounting of Costs and Revenues Associated with Transportation Electrification Pilots** to be served by electronic mail to those parties whose email addresses appear on the attached service list to those parties on the attached service lists for OPUC Dockets UM 1938 and UE 335.

Dated at Portland, Oregon, this 23rd day of April, 2021.

/s/ Jaki Ferchland

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