



Portland General Electric

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

April 22, 2022

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 394 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 reauthorization to defer the costs and revenues associated with the Transportation Electrification Pilots (TE Pilots or Pilots) approved by the Public Utility Commission of Oregon (Commission or OPUC) in 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 April 23, 2022, through April 22, 2023.

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 comply with Oregon's policy direction and support PGE's decarbonization, electrification, and performance imperatives.

In accordance with Commission Order Nos. 18-054 and 19-385 as well as 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 costs 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. In its April 23, 2021 application to reauthorize deferred accounting in this docket, PGE requested an extension of education & outreach activities due to the COVID-19 pandemic. The reauthorization application was approved in Order No. 21-475 without objection to the extension. Pilot activities for 2021 and the planned activities for 2022 are described in Attachment A, "Implementation Detail for Transportation Electrification Pilots."

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
4/23/2021	4/23/2021 – 4/22/2022	21-475
4/23/2022	4/23/2022 – 4/22/2023	

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 the 10 years of the Pilots and is capped at a maximum allowable cost of \$3.8 million as approved by Commission Order No. 19-385 and listed in Table 2 below.

**Table 2
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 \$0.5 million for the next 12 months and are included in the calendar year forecasts as presented in Table 3 below.

Table 3
Pilot O&M Costs (Net of applicable revenues)

	2018	2019	2020	2021	2022	
Pilot	Actual	Actual	Actual	Actual	Forecast	Total
Electric Avenue	\$2,966	\$(333)	\$538	\$44,351	\$448,444	\$495,966
Trimet	\$-	\$-	\$-	\$(64,205)	\$(42,646)	\$(106,851)
Education and Outreach	\$46,479	\$69,438	\$155,619	\$201,153	\$8,000	\$480,689
Evaluation	\$40,783	\$83,626	\$-	\$126,734	\$81,032	\$332,175
Total	\$90,229	\$152,731	\$156,157	\$308,033	\$494,830	\$1,201,980

e. Notice

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with the Notice of Application are attached to the application as Attachment B. In compliance with the provisions of OAR 860-027-0300(6), PGE is serving the Notice of Application on the UM 1938 and UE 394 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 Pilots' deferred costs will be subject to the three percent test in accordance with ORS 757.259(6) and (8), which limits aggregated deferral amortizations 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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Managing Assistant General Counsel
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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
Email: 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, effective April 23, 2022.

DATED this 22nd day of April 2022.

Respectfully Submitted,

/s/ Jaki Ferchland

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Attachment A

Implementation Detail for Transportation Electrification Pilots

Electric Avenue Pilot

Electric Avenue Network 2021 Activity

Operations and Maintenance

PGE maintained software and cellular service agreements with Greenlots and received warranty support from equipment manufacturer BTCPower. PGE oversaw a network-wide performance improvement effort by the equipment manufacturer in September, including the replacement of components and updating of firmware. Four DC fast charging dispensers and one rectifier unit were identified for replacement in Q2 2022. PGE continued to monitor equipment performance via uptime (the number of hours in a month a machine is online and available for charging and/or charging a vehicle divided by the number of hours in a month), first pass charge rate (percentage of time a charging session is successfully activated on the first attempt), number of service calls per unit per month, and customer feedback via social media platforms such as PlugShare.

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 again 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 2022 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 procure a spare parts inventory, and train and certify PGE Wiremen and Wiremen Helpers to inspect, test, repair, and replace Level 2 and DC fast charging equipment. 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 may explore hiring additional PGE staff to support.

PGE may explore the replacement of existing equipment at some or all Electric Avenue locations to improve customer experience and increase charging speed.

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 2021 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 Plot Activities.

TriMet Mass Transit 2.0 2022 Expected Activity

PGE plans to continue remote monitoring and periodic inspections and plans to train PGE Wiremen and Wiremen Helpers in the inspection, testing, and repair of transit bus charging infrastructure. PGE 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 2021 Activity

National Drive Electric Week (NDEW)

Due to COVID/Delta variant concerns, PGE did not participate in an in-person event for National Drive Electric Week in 2021. However, PGE did launch a digital/social campaign during NDEW highlighting the company's EV programs, dealer partners, and EV benefits.

Chargeway Beacon Renewal

Renewed software subscription for six deployed Chargeway beacons at local participating dealers throughout service territory.

Dealer Outreach 2021 Activity

Dealer Training and Engagement

PGE expanded our dealer partnership to include an additional six auto dealerships. Staff at these dealerships participated in computer-based training to better understand electric vehicle consumers and common barriers to adoption and participated in in-person training to understand the Chargeway platform; learn how to improve customers' experiences with EV charging away from home; and understand how to provide customers with information about PGE's Residential Smart Charging program. In addition to physical charging beacons, we also deployed online beacons to six partnering dealerships. Our successful dealership engagement with Chargeway, the Oregon Auto Dealers Association and our dealer partners has provided a model for Chargeway as they have entered a partnership with the National Auto Dealers Association to provide training and support to auto dealers nationally on electric vehicles and electric fuel.

Market Transformation Expected Activity 2022

Education and Awareness Campaign

PGE will launch an Education and Awareness campaign (planned for Q3 2022) intended to address common barriers to EV adoption: cost, range, and availability of charging. We will also raise awareness of key EV benefits: 1) that EVs 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 partner with the Oregon Electric Vehicles Association to promote NDEW activities in September 2022. In addition to in-person activities, we will have a corresponding digital campaign to promote EV benefits and programs designed to support EV use and adoption for our various customer groups.

Technical Assistance/Commercial 2021 Activity

In 2021, PGE implemented a third-party hosted [Total Cost of Ownership tool](#) on our website for fleet customers to use. The tool offers a user-friendly way for fleets to understand the costs and benefits of electrification, including capital costs for vehicles and chargers, fuel and maintenance cost savings, clean fuel credit revenue, and incentives/rebates. Customers that use the tool can request to be contacted by PGE for follow-up, and the vehicle data they enter is tracked so it can be used for system planning. Also in 2021, PGE launched the Fleet Partner program, which includes a technical planning component based on the learnings and experience gained through the Technical Assistance program. Additionally, we established new relationships with several commercial vehicle dealerships to help promote the Fleet Partner program to more fleets.

We continued to offer technical advisory services to commercial businesses and multi-family properties in 2021. For commercial customers, we had 1 phone consult and performed 12 site assessments. For multi-family customers, we had 8 phone consults and 5 site assessments.

Technical Assistance/Commercial 2022 Expected Activity

The Technical Assistance budget has been exhausted and no further activity is planned.

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 22, 2022, 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 22, 2022.

DATED this 22nd day of April 2022.

/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 394.

Dated at Portland, Oregon, this 22nd day of April 2022.

/s/ Jaki Ferchland

Jaki Ferchland
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UM 1938

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