



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204  
portlandgeneral.com

November 4, 2020

***Via Electronic Filing***

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

**Re: UM 1976 PGE's Application for Deferral of Expenses Associated with PGE's Demand Response Testbed Pilot**

Dear Filing Center:

Pursuant to ORS 757.259 and OAR 860-027-0030, Portland General Electric Company (PGE) hereby requests authorization to defer for later rate-making treatment operation and maintenance costs associated with PGE's Demand Response Testbed Pilot with an effective date of November 5, 2020.

PGE received authorization to defer Demand Response Testbed Pilot costs through Commission Order No. 19-425. A Notice of Application has been provided to the parties on the UE 335 and UM 1976 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, or Alina Nestjorkina at (503) 464-2144.

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

Sincerely,

*/s/ Jaki Ferchland*  
Jaki Ferchland  
Manager, Revenue Requirement

JF/np  
Enclosure  
cc: UE 335 and UM 1976 service lists

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1976**

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Expenses Associated with PGE’s Demand Response Testbed Pilot

**Application for Reauthorization of Deferral of Expenses Associated with PGE’s Demand Response Testbed Pilot**

Pursuant to ORS 757.259, OAR 860-027-0300, and Commission Order No. 17-386, Portland General Electric Company (PGE) hereby requests reauthorization to continue to defer the operations and maintenance (O&M) costs associated with PGE’s Demand Response (DR) Testbed Pilot (Testbed or Pilot) Phase I.<sup>1</sup> PGE requests this reauthorization be effective November 5, 2020 through November 4, 2021 to avoid any potential gap in PGE’s ability to defer these costs. Phase I of the Testbed began in July 2019 and will continue into the into the first quarter of 2022. This deferral will support the use of an automatic adjustment clause rate schedule, which will provide for changes in rates reflecting incremental costs associated with the pilot.

**I. Deferral History**

In alignment with the policies and requirements of the State of Oregon and the Public Utility Commission of Oregon (Commission or OPUC), PGE has developed the DR Testbed Pilot to help address decarbonization goals, assist customers in managing their energy consumption and total energy costs, and enhance operational performance and efficiency. PGE’s DR Testbed Pilot not only complies with Oregon’s policy direction, but also supports PGE’s decarbonization and performance imperatives.

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<sup>1</sup> The Testbed Pilot proposal and associated tariff, PGE Schedule 13 or Opt-out Demand Response Testbed Pilot, was filed for Commission approval on October 25, 2018 in OPUC Docket ADV 859, PGE Advice No. 18-14.

The Commission approved PGE's initial DR Testbed Pilot deferral application via Order No. 19-425 on December 6, 2019. Since the last reauthorization, PGE's DR Testbed team has been implementing numerous aspects of the Commission approved pilot plan.

*Customer Value Propositions (CVPs)*

- *Giving Back* - The Giving Back campaign was launched during the 2019/2020 winter season, to test whether charitable giving served as a motivator to increase participation in Peak Time Rebates (PTR). The Give Back campaign required internal information technology (IT) system enhancements to offer customers the ability to donate their on-bill rebates directly to one of three participating charities. This enhancement not only enabled Testbed customers to donate their bill savings but allowed PGE's internal IT department to test and prepare systems prior to territory-wide deployment of the Giving Back CVP.
- *Carbon CVP* - Launched during the summer 2020 season, the Carbon CVP framed the program benefits in terms of avoided greenhouse gas emissions and included a competitive comparison between Testbed neighborhoods on program PTR participation. The campaign ended on September 30, 2020 and data is still being gathered by the evaluator on the efficacy of the CVP.
- *Upcoming CVP Work* – Launching in the 2020/2021 winter season, upcoming work will incorporate learnings from the Giving Back campaign and test a modified design, include new non-profit partners, and a more streamlined, user friendly enrollment portal.

Findings from all three campaigns will be included in the Testbed evaluation reports, the first of which is scheduled to be completed in January 2021.

### *Diversity, Equity, and Inclusion (DEI) Work – In-field Personnel*

PGE's Testbed team hired the community-based Testbed staff, formally known as DEI Community Outreach Consultants. The DEI Consultants partner with city staff, community-based organizations and community members to drive Distributed Energy Resource adoption, increase understanding of grid operations, form durable community relationships, and identify barriers to participation and engagement. DEI Consultants have developed a community engagement plan for engaging with environmental justice communities based on the needs of the community and best practices in engagement.<sup>2</sup> This work now informs not only Testbed outreach but DEI work and program development broadly within the Company

### *Demonstration Projects*

- *Load disaggregation* - The Testbed team conducted load disaggregation modeling of major electric end use loads for residential customers, including space heating and cooling, water heating and electric vehicle targeting. Preliminary results show wide variation in end use fuel source and technology type based on the age of the neighborhood buildout, with the older homes in North Portland having lower levels of gas end uses and newer areas like southern Hillsboro having both more gas and a higher prevalence of central air conditioning. These results are being used to inform the technical potential of DR, prioritize product development, and enhance the effectiveness of customer engagement campaigns.
- *Electric Vehicle (EV) Rate Design* – In coordination with the Clean Fuels Program, the team is running an EV time of use demonstration in the Testbed. The

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<sup>2</sup> Environmental justice communities include communities of color, communities experiencing lower incomes, tribal communities, rural communities, frontier communities, coastal communities and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards, including but not limited to seniors, youth, and persons with disabilities.

demonstration is aimed at understanding how pricing signals influence EV charging behavior. This work, though funded through the Clean Fuels Funds,<sup>3</sup> is being conducted within the Testbed due to the project's ability to rapidly deploy within a representative subset of PGEs service territory as well as the Testbeds inherent ability for rapid feedback and adjustment.

- *Direct Load Control Demonstrations* – PGE has been working with Commission Staff and the Demand Response Review Committee (DRRC) members to design and launch new direct load control demonstration projects focused on heat pump water heaters and ductless heat pumps. These projects are part of the broader Testbed goal of accelerating the program development cycle. Operation of these demonstration projects is governed by Schedule 13, a modified version of which was approved by the Commission at the October 6, 2020 Public Meeting.

#### *Large Commercial and Industrial (C&I) Customer Work*

Testbed and Energy Partner Program teams have coordinated to test numerous outreach strategies to drive Energy Partner smart thermostat (Schedule 25) participation through direct mail, email and web campaigns, as well as call center phone banking, business reply cards, and door-to-door canvassing. The team is also exploring specialized incentives and new program design concepts with the large C&I element of Energy Partner (Schedule 26).

#### *Evaluation*

To maximize the research value of the Testbed Pilot, PGE is working closely with Cadmus on all program activities to identify insights from early stage results that can be incorporated into projects in near real time. Interim results from the evaluation tasks are being shared with the DRRC

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<sup>3</sup> As such, no costs from this project are included within UM 1976.

as they become available; formal evaluation work includes a mid-program report that will be available in January 2021 and a final evaluation in the first quarter of 2022.

In the initial UM 1976 deferral filing, PGE planned a two-and-a-half-year timeline for Phase I of Testbed. PGE is planning to run field work through December 2021 and will provide evaluation work for Phase I in the subsequent quarter.

## **II. The following is provided pursuant to OAR 860-027-0300(3) Requirements**

### a. Description of Utility Expense for Which Deferred Accounting is Requested.

See Deferral History above.

Pursuant to ORS 757.259(2)(e), PGE seeks continued reauthorization for deferred accounting treatment of the incremental costs associated with PGE's DR Testbed Pilot. PGE requests reauthorization for the effective period November 5, 2020 through November 4, 2021.

### b. Reasons for Deferral.

Pursuant to ORS 757.259(2)(e), PGE seeks deferred accounting treatment of the costs associated with Phase I of the Testbed. PGE expects to incur these costs over a two-and-a-half year period and is planning to submit Phase II of the pilot plan in Q3 of 2021. PGE will seek reauthorization of this deferral as well as the inclusion of Phase II costs in future applications. The granting of this Application will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers.

PGE expects any deferred amount to be recovered in a manner approved by the Commission.

### 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 total cost of the Testbed to be approximately \$4.6 million spread over a two-and-a-half-year period. While we are currently estimating a total spend of \$4.6M, the final cost may be higher depending on customer response to Testbed programs and newly approved activities by the Demand Response Review Committee. For the 12-month period starting on the effective date of this filing, PGE expects to incur incremental Testbed costs of approximately \$2.9 million. Table 1 below, provides a breakdown of estimated costs related to the Testbed Phase I.

**Table 1: Testbed Phase I Estimated Costs (\$000s)**

| <b>Budget Category</b>   | <b><u>Nov 18-Oct 19</u><br/><u>Actuals</u><sup>4</sup></b> | <b><u>Nov 19-Oct 20</u><br/><u>Actual and</u><br/><u>Forecast</u><sup>5</sup></b> | <b><u>Nov 20- Oct 21</u><br/><u>Forecast</u></b> | <b><u>Nov 21- Oct 22</u><br/><u>Forecast</u></b> | <b><u>Total</u></b> |
|--------------------------|--|---|--|--|---------------------|
| <b>Development Costs</b> |  |   |  |  |                     |
| Marketing                | 87   | 235   | 394  | 66   | 781                 |
| Evaluation & Research    | 1  | 154   | 279  | 47   | 480                 |
| Staffing                 | 9  | 640   | 583  | 130  | 1,362               |
| <b>Subtotal</b>          | <b>96</b>  | <b>1,029</b>  | <b>1,256</b>                                     | <b>242</b>                                       | <b>2,623</b>        |
| <b>Operating Costs</b>   |  |   |  |  |                     |
| Materials and Equipment  | 76   | 105   | 1,169  | 124  | 1,474               |
| Program incentives       | -  | 89  | 436  | 25   | 549                 |
| <b>Subtotal</b>          | <b>76</b>  | <b>193</b>  | <b>1,605</b>                                     | <b>149</b>                                       | <b>2,023</b>        |
| <b>Testbed Total</b>     | <b>172</b>   | <b>1,222</b>  | <b>2,861</b>                                     | <b>391</b>                                       | <b>4,646</b>        |

Development costs are costs to accelerate the implementation of DR as a non-carbon based peak power replacement resource, and operating costs represent costs associated with PGE’s existing DR offerings included in the Testbed, at higher participation rates. In the last forecasted year of

<sup>4</sup> Costs began to incur in July 2019

<sup>5</sup> Month of October is forecasted.

Testbed Phase I, costs are expected to increase as PGE: 1) promotes Direct Load Control Thermostat (DLCT); 2) invests further in the Multifamily DR Water Heater Pilot (MFR) within the Testbed, and 3) incurs the incentives costs of Testbed participation in our Pricing Pilot (FLEX). PGE's efforts to accelerate participation in our Energy Partner program for small and medium businesses as well as large C&I customers will also register as costs as the customer's equipment commissioning process has finalized.

Although the process of Energy Partner recruitment in the Testbed has begun, contracting, equipment commissioning, and performance can take six months. Energy Partner costs may not begin to be incurred until the latter half of 2021. Thus, actual expenditures may appear to be greater in the later months of the Testbed pilot.

e. Notice.

A copy of the notice of application for reauthorization of deferred accounting treatment and a list of persons served with the Notice are attached to the Application as Attachment A. In compliance with the provisions of 860-027-0300 (6), PGE is serving Notice of Application on the service list for PGE's last general rate case (UE 335) and the Service List for Docket UM 1976.

**III. The following is provided pursuant to OAR 860-027-0300(4) Requirements:**

a. Description of Deferred Account Entries

Please see sections II(a) and II(c) above.

b. The Reason for Continuing Deferred Accounting

PGE seeks approval to continue to defer revenues associated with DR Testbed Pilot between November 5, 2020 and November 4, 2021 for the reasons described in II (b) above.



#### **IV. Summary of Filing Conditions**

a. Earnings Review

PGE proposes that cost recovery associated with the Testbed Phase I continue to be supported by an automatic adjustment clause with amortization through Schedule 135 and, consequently, not be subject to an earnings review.

b. Prudence Review

PGE will submit third-party evaluation reports on the Pilot, which will provide cost summaries, estimated curtailment impacts, and results of customer satisfaction surveys. The Commission Staff can also review applicable cost details.

c. Sharing Percentages

All prudently incurred costs are to be recovered by PGE with no sharing mechanism.

d. Rate Spread/Rate Design

The rate spread/rate design will be performed in accordance with Schedule 135.

e. Three Percent Test

The amortization of the pilots' deferred costs will be subject to the three percent test in accordance with 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.

#### **V. PGE Contacts**

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

Application are:

Douglas C. Tingey  
Associate General Counsel  
Portland General Electric  
1WTC 1301  
121 SW Salmon Street  
Portland, OR 97204  
Phone: 503.464.8926  
E-mail: [doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

PGE-OPUC Filings  
Rates & Regulatory Affairs  
Portland General Electric  
1WTC 0306  
121 SW Salmon Street  
Portland, OR 97204  
Phone: 503.464.7805  
E-mail: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

**VI. Conclusion**

For the reasons stated above, PGE requests permission to defer the expenses associated with the Testbed as described herein.

DATED this 4th day of November 2020.

*/s/ Jaki Ferchland*  
Jaki Ferchland  
Manager, Revenue Requirement  
Portland General Electric Company  
121 SW Salmon St., 1WTC 0306  
Portland, OR 97204  
Telephone: 503.464.7488  
E-Mail: Jacquelyn.ferchland@pgn.com

## **Attachment A**

### **Notice of Application for Reauthorization of Deferral of Expenses Associated with PGE's Demand Response Testbed Pilot**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1976**

In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Expenses Associated with PGE's Demand Response Testbed Pilot

**Notice of Application for Reauthorization of Deferral of Expenses Associated with PGE's Demand Response Testbed Pilot**

On November 4, 2020, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission) for an Order reauthorizing deferral of expenses associated with PGE's Demand Response Testbed Pilot.

Approval of PGE's reauthorization application as proposed will support the use of an automatic adjustment clause rate schedule, which will provide for changes in rates reflecting incremental costs associated with the pilot.

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 December 4, 2020.

Dated: November 4, 2020

*/s/ Jaki Ferchland*  
Jaki Ferchland  
Manager, Revenue Requirement  
Portland General Electric Company  
121 SW Salmon St., 1WTC 0306  
Portland, OR 97204  
Telephone: 503.464.7488  
E-Mail: Jacquelyn.ferchland@pgn.com

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Reauthorization of Deferral of Expenses Associated with PGE's Demand Response Testbed Pilot** to be served by electronic mail on those parties whose email addresses appear in the attached service lists for OPUC Docket Nos. UM 1976 and UE 335.

Dated at Portland, Oregon, November 4, 2020.

*/s/ Jaki Ferchland*

Jaki Ferchland  
Manager, Revenue Requirement  
Portland General Electric Company  
121 SW Salmon St., 1WTC0306  
Portland, OR 97204  
Phone: (503) 464-7488  
E-Mail: Jacquelyn.ferchland@pgn.com

**SERVICE LIST  
OPUC DOCKET # UE 335**

|   |   |
|---|---|
| ROBERT D KAHN<br>NORTHWEST & INTERMOUNTAIN POWER<br>PRODUCERS COALITION | PO BOX 504<br>MERCER ISLAND WA 98040<br>rkahn@nippc.org |
|---|---|

**ALBERTSONS**

|  |  |
|--|--|
| BRIAN BETHKE<br>11555 DUBLIN CANYON ROAD | 250 PARKCENTER BLVD<br>BOISE ID 83706<br>brian.bethke@albertsons.com |
|--|--|

|  |  |
|--|--|
| CHRIS ISHIZU<br>ALBERTSONS COMPANIES, INC. | 250 PARKCENTER BLVD<br>BOISE ID 83706<br>chris.ishizu@albertsons.com |
|--|--|

|  |  |
|--|--|
| GEORGE WAIDELICH<br>ALBERTSONS COMPANIES' INC. | 11555 DUBLIN CANYON ROAD<br>PLEASANTON OR 94588<br>george.waidelich@albertsons.com |
|--|--|

**AWEC UE 335**

|  |  |
|--|--|
| BRADLEY MULLINS (C)<br>MOUNTAIN WEST ANALYTICS | 1750 SW HARBOR WAY STE 450<br>PORTLAND OR 97201<br>brmullins@mwanalytics.com |
|--|--|

|   |   |
|---|---|
| TYLER C PEPPLE (C)<br>DAVISON VAN CLEVE, PC | 1750 SW HARBOR WAY STE 450<br>PORTLAND OR 97201<br>tcp@dvclaw.com |
|---|---|

|   |  |
|---|--|
| ROBERT SWEETIN (C)<br>DAVISON VAN CLEVE, P.C. | 185 E. RENO AVE, SUITE B8C<br>LAS VEGAS NV 89119<br>rds@dvclaw.com |
|---|--|

**CALPINE SOLUTIONS**

|  |   |
|--|---|
| GREGORY M. ADAMS (C)<br>RICHARDSON ADAMS, PLLC | PO BOX 7218<br>BOISE ID 83702<br>greg@richardsonadams.com |
|--|---|

|  |  |
|--|--|
| GREG BASS<br>CALPINE ENERGY SOLUTIONS, LLC | 401 WEST A ST, STE 500<br>SAN DIEGO CA 92101<br>greg.bass@calpinesolutions.com |
|--|--|

|  |  |
|--|--|
| KEVIN HIGGINS (C)<br>ENERGY STRATEGIES LLC | 215 STATE ST - STE 200<br>SALT LAKE CITY UT 84111-2322<br>khiggins@energystrat.com |
|--|--|

**FRED MEYER**

|   |  |
|---|--|
| KURT J BOEHM (C)<br>BOEHM KURTZ & LOWRY | 36 E SEVENTH ST - STE 1510<br>CINCINNATI OH 45202<br>kboehm@bkllawfirm.com |
|---|--|

|   |   |
|---|---|
| JODY KYLER COHN (C)<br>BOEHM, KURTZ & LOWRY | 36 E SEVENTH ST STE 1510<br>CINCINNATI OH 45202<br><a href="mailto:jkylercohn@bkllawfirm.com">jkylercohn@bkllawfirm.com</a> |
|---|---|

**NIPPC**

SPENCER GRAY  
NIPPC sgray@nippc.org

IRION A SANGER (C)  
SANGER THOMPSON PC 1041 SE 58TH PLACE  
PORTLAND OR 97215  
irion@sanger-law.com

JONI L SLIGER  
SANGER LAW PC 1041 SE 58TH PL  
PORTLAND OR 97215  
joni@sanger-law.com

**OREGON CITIZENS UTILITY BOARD**

OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
dockets@oregoncub.org

MICHAEL GOETZ (C)  
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400  
PORTLAND OR 97205  
mike@oregoncub.org

ROBERT JENKS (C)  
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
bob@oregoncub.org

**PACIFICORP**

PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
oregondockets@pacificorp.com

MATTHEW MCVEE  
PACIFICORP 825 NE MULTNOMAH  
PORTLAND OR 97232  
matthew.mcvee@pacificorp.com

**PORTLAND GENERAL ELECTRIC**

PGE RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC  
COMPANY  
121 SW SALMON STREET, 1WTC0306  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

JAKI FERCHLAND  
PORTLAND GENERAL ELECTRIC 121 SW SALMON ST. 1WTC0306  
PORTLAND OR 97204  
jacquelyn.ferchland@pgn.com

DOUGLAS C TINGEY (C)  
PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC1301  
PORTLAND OR 97204  
doug.tingey@pgn.com

**SBUA**

JAMES BIRKELUND  
SMALL BUSINESS UTILITY  
ADVOCATES 548 MARKET ST STE 11200  
SAN FRANCISCO CA 94104  
james@utilityadvocates.org

DIANE HENKELS (C)  
SMALL BUSINESS UTILITY  
ADVOCATES 621 SW MORRISON ST. STE 1025  
PORTLAND OR 97205  
diane@utilityadvocates.org

**STAFF**

STEPHANIE S ANDRUS (C) BUSINESS ACTIVITIES SECTION  
PUC STAFF--DEPARTMENT OF JUSTICE 1162 COURT ST NE  
SALEM OR 97301-4096  
stephanie.andrus@state.or.us

MARIANNE GARDNER (C) PO BOX 1088  
PUBLIC UTILITY COMMISSION OF SALEM OR 97308-1088  
OREGON marianne.gardner@state.or.us

SOMMER MOSER (C) 1162 COURT ST NE  
PUC STAFF - DEPARTMENT OF SALEM OR 97301  
JUSTICE sommer.moser@doj.state.or.us

**WALMART**

VICKI M BALDWIN (C) 201 S MAIN ST STE 1800  
PARSONS BEHLE & LATIMER SALT LAKE CITY UT 84111  
vbaldwin@parsonsbhleh.com

STEVE W CHRISS (C) 2001 SE 10TH ST  
WAL-MART STORES, INC. BENTONVILLE AR 72716-0550  
stephen.chriss@wal-mart.com

**SERVICE LIST  
OPUC DOCKET # UM 1976**

**STAFF**

KACIA BROCKMAN PO BOX 1088  
PUBLIC UTILITY COMMISSION SALEM OR 97308-1088  
kacia.brockman@state.or.us

ELIZABETH B UZELAC BUSINESS ACTIVITIES SECTION  
PUC STAFF - DEPARTMENT OF JUSTICE 1162 COURT ST NE  
SALEM OR 97301-4096  
elizabeth.b.uzelac@state.or.us

MITCH MOORE PO BOX 1088  
PUBLIC UTILITY COMMISSION OF SALEM OR 97308-1088  
OREGON mitch.moore@state.or.us

**PORTLAND GENERAL ELECTRIC**

PGE RATES AND REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC  
COMPANY  
121 SW SALMON STREET, 1WTC0306  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

JAKI FERCHLAND 121 SW SALMON ST. 1WTC0306  
PORTLAND GENERAL ELECTRIC PORTLAND OR 97204  
jacquelyn.ferchland@pgn.com

DOUGLAS C TINGEY 121 SW SALMON 1WTC1301  
PORTLAND GENERAL ELECTRIC PORTLAND OR 97204  
doug.tingey@pgn.com