



Portland General Electric Company
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February 22, 2024

Via Electronic Filing

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

RE: UM 2003 PGE's Application for Reauthorization of Deferral of Costs Associated with PGE's Electric Vehicle Charging Pilots

Enclosed for filing is Portland General Electric Company's (PGE) Application for Reauthorization of the Deferral of Costs Associated with PGE's Electric Vehicle Charging Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UE 416 and UM 2003 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 email Stephen Leeb at stephen.leeb@pgn.com.

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
Senior Manager, Revenue Requirement

JF/dm
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2003

In the Matter of
PORTLAND GENERAL ELECTRIC COMPANY
Deferral Of Costs Associated With EV Charging
Pilots

**APPLICATION FOR
REAUTHORIZATION OF DEFERRAL OF
COSTS ASSOCIATED WITH PGE's
ELECTRIC VEHICLE CHARGING
PILOTS**

Pursuant to ORS 757.259, OAR 860-027-0300, and Commission Order No. 22-263, Portland General Electric Company (PGE) respectfully requests reauthorization to continue to defer costs associated with the two Electric Vehicle Charging Pilots (EV Charging Pilots or Pilots). PGE requests this reauthorization be effective February 22, 2024, through February 21, 2025, and be subject to an automatic adjustment clause recovered through Schedule 150 as approved in Commission Order No. 22-129 and Advice Filing 22-38.

I. Deferral History

Public Utility Commission of Oregon (Commission or OPUC) Order No. 18-054 adopted a stipulation that authorized PGE to undertake three transportation electrification pilots and provided guidance for PGE to propose two additional pilots. The stipulating parties agreed that PGE would propose one residential and one business EV Charging Pilot within one year of the February 16, 2018, date of Order No. 18-054. In compliance, PGE submitted its EV Charging Pilot proposals as part of the initial filing in this docket on February 15, 2019. On February 22, 2019, PGE filed an amended application to correct the effective date of the deferral application and the filing condition related to Rate Spread/Rate Design. Following this, in Docket No. UE 394 (PGE's 2022 General Rate Case), PGE requested to recover deferred costs for UM 2003 through Schedule 150 and according to HB 2165, which allows for costs to be allocated to all customers based on

total revenues. Commission Order No. 22-129 in UE 394 authorized the collection of current EV pilots through Schedule 150 but denied the ability to allocate costs under HB 2165 and instead ordered costs for existing EV pilot programs to be recovered consistent with distribution revenues. PGE filed and received authorizations for this deferral as shown in Table 1 below.

Table 1

Filing Date	Renewal Period	Order No.
2/15/2019	2/22/19 – 2/21/20	20-381
2/21/2020	2/22/20 – 2/21/21	20-381
2/11/2021	2/22/21 – 2/21/22	21-132
2/22/2022	2/22/22 – 2/21/23	22-263
2/22/2023	2/22/23 – 2/21/24	Pending

Residential EV Charging Pilot

The Residential EV Charging Pilot aims to support EV adoption while managing incoming load to the grid by financially supporting and facilitating the installation of qualified connected charging stations. In addition, the residential pilot explores mechanisms to realize the value of the delivery of grid services (demand response, daily load shifting, and load following) via the connected chargers or vehicle telematics. As part of the Residential EV Charging Pilot, PGE provides rebates (standard, income eligible, bring-your-own, and vehicle telematics) to customers for the hardwired installation of qualifying Level 2 connected EV home chargers.¹ All enrolled customers also receive seasonal performance incentives for participation in grid services.

The Residential EV Charging Pilot had a soft launch on October 22, 2020, and was focused on PGE employees and targeted EV owners. Pilot participants were asked to provide feedback on their experience and were actively engaged in improving the customer experience. Twenty-four PGE customers were enrolled in the residential pilot by January 3, 2021, with 12 requesting

¹ The exact characteristics of a qualifying charger will be based on a Request for Information and related responses by vendors.

enrollments into the Schedule 7 Time of Use rate. Additionally, on December 2020, PGE launched the EV dealership referral program. Previously, PGE had nine Chargeway Beacons installed in local dealerships to test the referral process and the Pilot’s communication with customers. That dealership program ended in 2023, and PGE is exploring new opportunities to partner directly with dealers. On January 4, 2021, PGE began efforts to market the residential pilot to the entire residential segment. As of January 1, 2024, there are 4,529 enrolled chargers/vehicles with a 6% unenrollment rate. See Table 2 below for additional details. PGE is targeting residential pilot enrollment of 7,829 chargers/vehicles by year end 2024.

**Table 2
Enrollment Data for Residential EV Pilot**

Rebate/Incentive Type	Enrollments	Unenrollments	Total Enrollments
Standard	2,522	116	2,406
Income Eligible	306	23	283
Bring Your Own Charger (BYOC)	68	6	62
Vehicle Telematics	1,922	144	1,778
TOTAL	4,818	289	4,529

As of January 1, 2024, this Pilot is transitioning to being funded through HB 2165, as a part of OPUC Docket No UM 2218, PGE’s Monthly Meter Charge deferral. Reporting will continue under UM 2033—PGE’s Transportation Electrification Plan—as approved by Commission Order No. 23-147.

Business EV Charging Rebate Pilot

PGE’s Business EV Charging Rebate Pilot aims to enable business customers to deploy charging infrastructure while assembling a portfolio of distributed energy resources that will be able to create future system value.

PGE’s Business EV Charging Rebate Pilot is designed to mitigate issues with cost, complexity, and effort that otherwise may preclude businesses from installing charging infrastructure. Through the business pilot, PGE supports nonresidential customer deployments of

charging infrastructure and reduces their associated costs. On July 17, 2020, PGE submitted a modified proposal for the Business EV Charging Rebate Pilot, designed to reflect the amended stipulation adopted by Commission Order No. 19-385 in Docket No. UM 1811. The modified proposal entailed a rebate of \$500 per charging port for non-residential customers installing qualified networked chargers and a rebate of \$2,300 per charging port for income-qualified multifamily properties. On December 15, 2020, the Commission approved PGE Schedule 52, which implemented the modified proposal effective December 18, 2020. Consequently, the Business EV Charging Rebate Pilot launched on December 18, 2020 with a new website, a list of 12 qualified products, application checklist, online application, and Frequently Asked Questions. On May 27, 2021, PGE submitted ADV 1273, a tariff amendment to increase the value of the standard rebate from \$500 to \$1000 per qualifying Level 2 port, effective July 1, 2021. On June 29, 2021, the Commission approved the tariff amendment in ADV 1273. Because the overall budget for the business pilot was established in the stipulation for Commission Order 19-385, this change did not increase the budget, and instead reduced the number of rebates issued, from approximately 1,000 to 588 rebates.

In 2023, there were thirty-three total applicants for this program. One hundred thirty ports were installed, and \$193,700 in rebate payments were issued to thirty customers. Three applicants were not qualified for the rebate because they did not install qualified chargers. The numbers included reflect the rebates funded from this filing. The UM 2033 filing will include an annual report that will reflect the total number of rebates for the program, as rebates were expanded to other use cases through PGE's December 2022 UM 2218 filing.

II. OAR 860-027-0300 Requirements:

The following is required pursuant to OAR 860-027-0300(3):

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

See Deferral History above.

b. Reasons for Deferral

Pursuant to ORS 757.259(2)(e), and for the reasons discussed above, PGE seeks deferred accounting treatment for the incremental operation and maintenance (O&M) costs associated with the EV Charging Pilots. 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.

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 expense accounts.

d. Estimate of Amounts to be Recorded Over the Next 12 Months

The total cost of the Business EV Charging Rebate Pilot is capped at \$1 million pursuant to Commission Order No. 19-385. PGE expects to incur O&M costs of approximately \$596,100 in 2024. Future reporting on these costs will be included in PGE's TE Plan as a part of UM 2033.

e. Notice

A copy of the Notice of Application for Reauthorization of Deferral of incremental O&M costs associated with the EV Charging Pilots 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 UE 416 Service List, PGE's most recent general rate case, and the UM 2003 Service List.

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

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 incremental O&M costs associated with the Business EV Charging Pilot proposed with PGE's initial deferral application. Without reauthorization this deferral will expire on February 21, 2024.

IV. Summary of Filing Conditions

a. Earnings Review

Cost recovery associated with this deferral will not be subject to an earnings review since it would be subject to an automatic adjustment clause.

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of this deferral's annual reauthorization filing or application to update Schedule 150.

c. Sharing Percentages

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

d. Rate Spread / Rate Design

As established in Docket No. UE 394, Order No. 22-129, PGE Schedule 150 costs associated with UM 2003 should be allocated based on an equal percent of distribution revenue applied on a cents-per-kWh basis.

e. Three Percent Test (OAR 757.259 (6))

The amortization of the pilots' deferred costs will be subject to the three percent test, 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 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:

Stephen Leeb, Regulatory Analyst
E-mail: stephen.leeb@pgn.com

VI. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the Deferred Amount as described herein from the date of this application.

DATED this 22nd day of February 2024.

/s/ Jaki Ferchland

Jaki Ferchland
Senior Manager, Revenue Requirement
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Attachment A

Notice of Application for Reauthorization of Deferral of Costs Associated With PGE's Electric Vehicle Charging Pilots

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2003**

In the Matter of
PORTLAND GENERAL ELECTRIC COMPANY
Deferral Of Costs Associated With EV Charging
Pilots

**NOTICE OF APPLICATION FOR
REAUTHORIZATION OF DEFERRAL OF
COSTS ASSOCIATED WITH PGE's
ELECTRIC VEHICLE CHARGING
PILOTS**

On February 22, 2024 Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (the Commission or OPUC) for an Order authorizing the continuance of the deferral of operation and maintenance (O&M) costs associated with the Electric Vehicle Charging Pilots.

Approval of PGE's Application will not authorize a change in PGE's rates but will permit consideration of rate treatment in a subsequent proceeding.

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

Any person who wishes to submit written comments to the Commission on PGE's application must do so no later than March 19, 2024.

Dated: February 22, 2024

/s/ Jaki Ferchland

Jaki Ferchland
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application for Reauthorization of Deferral of Costs Associated with PGE's Electric Vehicle Charging Pilots** to be served by electronic mail to those parties whose email addresses appear in the attached service lists for OPUC Docket No. UE 416 and UM 2003.

Dated at Portland, Oregon, this 22nd day of February, 2024.

/s/ Jaki Ferchland

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