



**Portland General Electric Company**  
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December 29, 2023

***Via Electronic Filing***

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

**Re: UM 2234 PGE's Application to Reauthorize Deferred Accounting of Incremental Costs Associated with the Flexible Load Demand Response Pilots**

Dear Filing Center:

Enclosed for filing is Portland General Electric Company's (PGE) Application to Reauthorize Deferred Accounting of Incremental Costs Associated with certain PGE's Flexible Load Demand Response Pilots.

A Notice regarding the filing of this application has been provided to the parties on the UE 416 and UM 2234 service lists. Work papers have been submitted to [puc.workpapers@puc.oregon.gov](mailto:puc.workpapers@puc.oregon.gov).

Parties who wish to receive a copy of this Application should review the Public Utility Commission of Oregon (OPUC) website.

Thank you for your assistance in this matter. If you have any questions or require further information, please contact Ben Orndoff at (541) 973-4304. 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  
Senior Manager, Revenue Requirement

JF/dm  
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2234**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

PGE Deferral of Incremental Costs  
Associated with the Flexible Load Demand  
Response Pilots

**Application for Reauthorization of  
Deferred Accounting for Incremental Costs  
Associated with the Flexible Load Demand  
Response Pilots**

Pursuant to ORS 757.210, 757.259, OAR 860-027-0300, and Public Utility Commission of Oregon (Commission or OPUC) Order Nos. 22-115 and 23-456, Portland General Electric Company (PGE) hereby requests approval to continue to defer incremental operations and maintenance (O&M) costs associated with certain PGE Flexible Load Demand Response Pilots, which are amortized through Schedule 135. These demand response pilots are described in PGE’s 2021 Flexible Load Plan Multi-Year Plan (MYP) and September 2022 update (generally referred to as the 2022-2023 MYP), which were filed in Docket No. UM 2141.

In the second quarter of 2023, Staff requested PGE not to submit a new MYP (i.e., 2024-2025) for consideration because an MYP filing at the end of 2023 would not be well aligned with Staff’s resource needs for review of a new MYP, nor would it support discussions regarding integration of the MYP with PGE’s Distribution System Planning (DSP) process. As such, on November 30, 2023, PGE and OPUC Staff filed a joint motion to the Commission requesting an order that extends the approval of the 2022-2023 MYP beyond the currently authorized period of December 31, 2023 to the earlier of December 31, 2024, or when the Commission issues an order on a supplemental MYP filing to authorize further incremental 2024 program funding and

activity.<sup>1</sup> On December 1, 2023, PGE filed a supplemental MYP that contains information regarding PGE’s planned 2024 MYP activities, including the forecasted 2024 budget with spending adjustments by pilot or program and forecasted megawatt (MW) acquisitions.<sup>2</sup>

The deferral reauthorization will continue to support the use of an automatic adjustment clause rate schedule, which will provide for changes in prices reflecting incremental costs associated with the pilots. PGE requests this application to be effective from January 1, 2024, through December 31, 2024.

In support of this application PGE states:

1. PGE is a public utility in the state of Oregon and its rates, service and accounting practices are subject to regulation by the Commission.
2. This application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize deferral of certain items.
3. Written communications regarding this Application should be addressed to:

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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:

Ben Orndoff, Regulatory Analyst  
E-mail: ben.orndoff@pgn.com

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<sup>1</sup> This joint request was approved on December 20, 2023 via Commission Order No. 23-481.

<sup>2</sup> Both the joint motion and supplemental MYP were filed under Docket No. UM 2141.

## **I. Deferral History**

In alignment with the policies and requirements of the State of Oregon and the Commission, PGE developed demand response pilots to help address decarbonization goals, assist customers in managing their energy consumption and total energy costs, and enhance operational performance and efficiency. PGE's demand response pilots comply with Oregon's policy directives and support PGE's decarbonization and performance imperatives. PGE filed its inaugural Flexible Load Multi-Year Plan (MYP) for 2022-2023 in Docket No. UM 2141. In Order No. 22-115, the Commission approved certain elements of PGE's filed Flexible Load MYP, including the consolidation of five pilots under one single deferral authorization. Subsequently, PGE filed an application in Docket No. UM 2234 to authorize a single, new deferral authorization request for these five pilots, approved by the Commission in Order No. 22-127.

The five pilots included in the UM 2234 deferral are:

- Residential Peak Time Rebate (PTR) pilot operating under Schedule 7;
- Residential Time of Day (TOD)<sup>3</sup> program operating under Schedule 7;
- Residential Smart Thermostat program operating under Schedule 5;
- Energy Partner Demand Response program operating under Schedule 26; and
- Phase II activities of the Smart Grid Testbed approved by the Commission in Order Nos. 21-444, 23-258, and 23-276.

In addition to these five pilots, PGE also included for the first time in our MYP supplemental detail on funding of Northwest Energy Efficiency Alliance's (NEEA) End-Use Load Flex Project. Information about each pilot/program, as well as NEEA's End-Use Flex

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<sup>3</sup> Also called "Time of Day."

Project, is provided below.<sup>4</sup>

*Nonresidential Demand Response Program (PGE Schedule 26)*

Also referred to as Energy Partner Demand Response program, PGE first filed for this deferral via Docket No. UM 1514 on December 29, 2010, first received approval for this pilot via OPUC Order No. 11-182, and has filed reauthorization requests and received approvals for the pilot annually thereafter.

This non-residential demand response program is designed to reduce peak demand requirements during specific time windows in the winter and summer seasons by incentivizing customers to reduce their energy consumption during those times. PGE expects the primary source of this reduced demand (load) will be from large nonresidential customers, with an option for small and medium nonresidential customers to participate as well. This program provides capacity and may evolve to provide intra-hour grid services to support reliability and renewables integration. As of December 1, 2023, the program has built 35.9 MW of summer capacity and 29.2 MW of winter capacity.

The difference between actual and forecasted Total Customer Incentives is primarily a result of the relatively complex incentive payment structure. During seasonal event months, participants are paid a Reservation Payment when either (1) they meet their participation requirements in all events, or (2) no events are called that month—months where no events are scheduled result in 100% of reservation funding being paid to participants. During months with events, up to half of participants typically fail to meet participation targets. The budget outcome is that during months with scheduled events, the program incurs approximately half the incentive

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<sup>4</sup> See PGE's supplemental MYP (Docket No. UM 2141) for further detail on each pilot and NEEA's End-Use Flex Project.

costs compared to non-event months. The deferral forecast assumed that two seasonal event months would not have scheduled events; in practice, there were three non-event months.

*Residential Direct Load Control Thermostat (DLCT) Pilot (PGE Schedule 5)*

Also referred to as the Residential Smart Thermostat program, PGE first filed for this deferral via Docket No. UM 1708 on October 3, 2014, first received approval for this pilot via OPUC Order No. 15-203, and has filed reauthorization requests and received approvals for the pilot annually thereafter.

The DLCT Pilot aims to enroll and operate connected residential thermostats to control electric heating and cooling load. This pilot provides firm capacity. To participate in the pilot, PGE residential customers must operate a ducted heat pump, electric forced-air furnace, or central air conditioner. As of December 1, 2023, the pilot has built 39.2 MW of summer capacity and 8.5 MW of winter capacity.

*Flex 2.0 – Peak Time Rebate (PTR) and Time of Day (TOD) (PGE Schedule 7)*

PGE first filed for this deferral via Docket No. UM 1708 on October 3, 2014, received approval via OPUC Order No. 15-203 and has filed reauthorization requests and received approvals for the pilot annually thereafter.

The Flex 2.0 Residential Pricing Pilot consists of two offerings: PTR and a TOD rate. Both provide energy use optimization by shifting use out of high-demand periods to provide peak reduction. Additional information about each is provided below.

**PTR:** The vast majority of PGE’s residential customer base is eligible to participate in PTR. Enrollment has flattened compared to the first years of the program launch but remains steady at around 123,000 residential customers, which is about 15% of the residential customer base. The PTR pilot provides educational energy-saving tips and rewards customers for shifting their energy

use during typically three-hour “event” periods when energy demand or prices are high. This helps PGE use more sustainable energy resources, lower costs, and provide customers with reliable energy. Customers are notified one day prior to the event via text and/or email, based on their preference, and encouraged to shift usage during the event hours the next day. They also typically receive a same-day event reminder. After the event, they are notified of the result of their specific effort and, if applicable, their earned incentive. Customers earn \$1.00 for every kWh they shift during an event, and the rebate appears as a credit on their next monthly bill. There is no “penalty” should a customer use more than expected energy during an event, making PTR a no-risk, “win-only” offering for our customers.

**Time of Day (TOD):**

TOD is available to all of PGE’s residential customer base and has approximately 14,650 residential customers enrolled. This is about 86% of the original EOY 2023 target of 17,000 enrollments. The TOD pricing plan provides customers more control over their electric bills and offers opportunities to save money by shifting energy use away from the peak hours when power costs more and renewable resources are less plentiful. TOD also helps reduce system peak loads and reduce associated carbon footprint and greenhouse gas emissions. Aligning on-peak hours with capacity constraints encourages customers to shift usage during energy peaks, reduces the need for construction of new power plants and supports a reliable grid. TOD is one way our customers can partner with PGE and play an active role in grid management to enable a cleaner, greener energy future for all.

Smart Grid Testbed (SGTB or Testbed) Pilot Phase II (PGE Schedule 13)

PGE first filed for this deferral via Docket No. UM 1976 on November 5, 2018, first received approval for this pilot via OPUC Order No. 19-425 and has filed for reauthorization and received approvals for the pilot annually thereafter.

Phase II of the SGTB is focused on resource development, distributed energy resource (DER) deployment, and operationalizing DERs to demonstrate their viability as resources capable of meeting customer and grid needs. Phase II has six major investigations and project research areas to be rolled out over time:

1. Flexible Feeder
2. Commercial and Industrial, Municipal Flexible Load & Resiliency
3. Distributed photovoltaics (PV)/Smart
4. Multifamily Bundle
5. Managed electric vehicle (EV) charging/vehicle-to-everything (V2X)
6. Single Family New Construction Bundle

Testbed Phase II is a five-year project with a cost of \$11 million (approximately \$2.2 million per year on average). Just as Testbed Phase I provided valuable lessons and significant change to PGE's approach to demand response, flexible load, and DERs with a customer solutions, engagement and participation focus, Phase II is producing valuable lessons to inform PGE's approach to planning, resource development and utilization. The six research areas shown above represent a collective strategic investment to accelerate community-based DER development.

PGE launched both the Smart Solar and EV Charging projects and finalized planning for the Flexible Feeder and Multifamily Bundle projects in 2023, resulting in adjusted cost estimates compared to 2022. The primary cost drivers in 2023 compared to 2022 are incremental PGE labor



and “DRMS<sup>5</sup> Provider.” The “incremental PGE labor” costs were described in PGE’s proposed SGTB Phase II plan which was approved in Order No. 21-444 and are incremental to the amounts currently included in base rates.<sup>6</sup> The increase in “DRMS Provider” costs is related to the integration and control of new flexible load technologies, such as solar smart inverters, heat pump space conditioning technology, and telematics-based EV charge management.

*NEEA End-Use Load Flex Project*

PGE provides core funding to the NEEA via its Funding Agreement with the Energy Trust of Oregon (ETO) which serves as a conduit for PGE. In addition to this long-standing commitment and investment in energy efficiency market transformation PGE will be contributing funding to a NEEA special project, the 2024-2025 End Use Load Flex (EULF), to leverage NEEA’s expertise to advance flexible load management in the Pacific Northwest. The goal of the EULF is to bring together participants (e.g., PGE, Pacific Power, Avista Utilities, Puget Sound Energy, Tacoma Power, etc.) to identify regional interests and needs, share information to amplify efforts and avoid duplication, develop a comprehensive End-Use Load Flexibility Market Transformation Portfolio, to promote technologies inclusive of open-source communication standards that can be leveraged by utilities and aggregators for the benefit of the grid without impacting the customer experience.

In 2024 NEEA will begin by convening multiple utility funders and regional demand-side organizations to align on Flex Load principles and leverage a regional market transformation portfolio to develop standards, influence stakeholders, prioritize scalable products/designs that meet utility and grid needs, and deliver efficiencies of scale on behalf of the region. PGE’s portion of 2024 funding for the project is \$357,500.

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<sup>5</sup> Demand Response Management System.

<sup>6</sup> PGE’s SGTB Phase II Proposal, filed on October 1, 2021 in Docket No. UM 1976, requested additional incremental PGE labor that was not included in the general rate case request (see, page 41).

## II. OAR 860-027-0300(3) Requirements

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

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

See Deferral History above.

### B. Reasons for Deferral

PGE seeks reauthorization of a single deferral to defer the expenses associated with the five pilots/programs described above. Without reauthorization, this deferral will expire on December 31, 2023. The continuation of the deferral will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. The reauthorization will continue to support the use of an automatic adjustment clause rate schedule, which will provide for changes in prices reflecting incremental costs associated with the pilots/program.

### 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 Twelve Months.

PGE estimates the total incremental Flexible Load Demand Response Pilots amount to defer in the next twelve months to be approximately \$15.1 million as shown in Table 1 below.<sup>7</sup>

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<sup>7</sup> Although not included in Table 1, PGE also expects to contribute \$357,500 towards NEEA's EULP in 2024 as detailed in the supplemental MYP.

**Table 1**  
**Pilot/Program Costs by Year (\$000's)**

	<b>2023 Actuals*</b>	<b>2024 Forecast</b>	<b>2-Year Total</b>
<b>Schedule 26</b>	4,095	4,716	<b>8,811</b>
<b>TOD</b>	402	690	<b>1,092</b>
<b>PTR</b>	2,255	3,041	<b>5,296</b>
<b>DLCT</b>	2,593	3,922	<b>6,516</b>
<b>SGTB – Phase II</b>	907	2,722	<b>3,629</b>
<b>Total</b>	<b>10,252</b>	<b>15,092</b>	<b>25,344</b>

*\* Actuals for January-September and forecast for October-December*

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 provided as Attachment A. In compliance with the provisions of OAR 860-027-0300(6), PGE is serving the notice of application on the UM 2234 and UE 416 Service Lists.

**III. Summary of Filing Conditions**

a. Earnings Review

Cost recovery associated with this deferral will not be subject to an earnings review because it is subject to an automatic adjustment clause and recovery of costs via Schedule 135.

b. Prudence Review

The Commission Staff should perform a prudence review as part of their review of this deferral's annual reauthorization filing or application to update Schedule 135.

c. Sharing

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

d. Rate Spread/Rate Design

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

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

The amortization of the Flexible Load Demand Response 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 during a twelve-month period to no more than three percent of the utility's gross revenues for the preceding year.

**IV. Conclusion**

For the reasons stated above, PGE requests approval to continue to defer the incremental costs associated with the Flexible Load Demand Response Pilots effective January 1, 2024 through December 31, 2024.

DATED this 29th day of December 2023.

*/s/ Jaki Ferchland*

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## **Attachment A**

### **Notice of Application to Reauthorize Deferred Accounting of Costs Associated with the Flexible Load Demand Response Pilots**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2234**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

PGE Deferral of Costs Associated with the  
Flexible Load Demand Response Pilots

**Application for Reauthorization of  
Deferred Accounting for Costs Associated  
with Flexible Load Demand Response  
Pilots**

On December 29, 2023, Portland General Electric Company (PGE) filed an Application for Reauthorization of Deferral of Costs Associated with PGE’s Flexible Load Demand Response Pilots with the Public Utility Commission of Oregon (the Commission).

Approval of the deferred accounting treatment will support the use of an automatic adjustment clause rate schedule and balancing account, which will provide for changes in rates reflecting the incremental costs associated with the Flexible Load Demand Response Pilots.

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 January 29, 2024.

Dated this 29th day of December 2023.

*/s/ Jaki Ferchland*  
Jaki Ferchland  
Senior Manager, Revenue Requirement  
Portland General Electric Company  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **Notice of Application to Reauthorize Deferred Accounting of Costs Associated with the Flexible Load Demand Response Pilots** to be served by electronic mail to those parties on the attached service lists for OPUC Docket Nos. UE 416 and UM 2234.

Dated at Portland, Oregon, this 29th day of December 2023.

*/s/ Jaki Ferchland*

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