ITEM NO. CA2

PUBLIC UTILITY COMMISSION OF OREGON STAFF REPORT PUBLIC MEETING DATE: December 3, 2019

REGULAR CONSENT X EFFECTIVE DATE December 4, 2019

- DATE: November 18, 2019
- TO: Public Utility Commission
- **FROM:** Kathy Zarate
- THROUGH: Michael Dougherty and John Crider SIGNED
- SUBJECT: <u>PORTLAND GENERAL ELECTRIC</u>: (Docket No. ADV 1029/Advice No.19-19) Requests housekeeping revisions to proposed tariff sheet associated with Tariff P.U.C. No. 18.

STAFF RECOMMENDATION:

The Oregon Public Utility Commission (Commission) should approve Portland General Electric's (PGE or Company) proposed housekeeping revisions to tariff sheets associated with Tariff P.U.C. No. 18 for service rendered on and after December 4, 2019.

<u>Issue</u>

Whether the Commission should allow PGE's housekeeping amendments to tariff sheets that reflect recent Commission-approved changes to other schedules.

Applicable Law

The Company's filing involves tariff sheets that are governed by ORS 757.205 and OAR 860-022-0025. Under ORS 757.205(1), a public utility must file schedules showing all rates, tolls, and charges for service that have been established and are in force at the time. Tariff revisions or corrections may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0005 and OAR 860-022-0025.

Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the changes. Under

OAR 860-021-0125, the current 15-day due and payable period is the minimum, but there is no maximum.

<u>Analysis</u>

This filing is a housekeeping filing that corrects titling errors. PGE originally submitted its filing on October 29, 2019.

The changes either correct grammatical errors or reflect updates to previous Commission-approved tariff changes. In this case, the Company revisited the reasons for these changes in its review of this filing and the only the proposed changes in this filing make a number of housekeeping changes to PGE's Tariff for the purpose of correcting references, typographical errors, and minor updates. OAR 860-022-0030(1) does not apply as this filing does not propose to increase prices.

The Company proposes the following changes:

- Sheet No. 1-1: The caption "Residential Service" is added designating the rate schedules that are truly for Residential Customers. The "Standard Service" caption has been shifted down with the rate schedules that are considered Standard Service Schedules as defined in PGE's Tariff as, "service option provided by the Company to a Nonresidential Customer who elects to purchase electricity from the Company rather than from an ESS." Added "Residential" to Schedule 5 which adds consistency to the other listed Residential Services. Also, added "No New Service" to Schedule 6. PGE filed updates to Schedule 6 in Advice No. 19-13.
- Sheet No. 5-1: "Residential" was added to the title of the rate schedule.
- Sheet No. 7-1: Reference of "First 1,000 kWh block adjustment" was removed under the Monthly Rate Energy Charge.
- Sheet Nos. 13-1 and 13-2: The peak time rebate (PTR) language is aligned in the Opt Out Residential Demand Response Testbed Pilot with the same language that was approved in Advice 19-03, Residential Pricing Program aka Flex 2.0. Although there are margin codes that moved, changed, and added material which resulted in withdrawing Sheet No. 13-3, all of the proposed changes are housekeeping in nature.
- Sheet Nos. 25-2, 25-3, and 25-4: Provided clarification in the Applicable section that Schedule 25 is limited to non-Direct Access Customers and listed the rate schedules that are applicable. Also removed the Special Condition that had language regarding "meter read date," which then renumbered the other Special Conditions.

- Sheet Nos. 32-4, 38-3, and 81-1: Wheeling was updated from 0.307¢ per kWh to 0.306¢ per kWh. These three sheets were inadvertently excluded from Advice No. 18- 26 when the other prices were filed and approved in PGE's General Rate Revision.
- Sheet Nos. 1-6, 75-7, 109-1, 110-1, 123-1, 215-3, 216-4, 575-5, B-1, B-7 and K-11 & K-16: Several sheets were inadvertently excluded from PGE's Advice No. 18-05 where Point of Delivery (POD) changed to Service Point (SP). Sheet B - 7 also has redline that was inadvertently not removed.
- Sheet No. 136-1: Schedules 75/575 were inadvertently not included on the initial filing. The New Schedule 136 was approved in Advice No. 19-12. Currently no customers are on those Schedules, but needed to add to be applicable.
- Sheet No. 137-1: Correction made to the Oregon Revised Statute citation.
- Sheet Nos. 102-1 and 490-1: Added punctuation that was missing.
- Sheet Nos. 300-5, 1-2 and 1-3: A footnote was added to the Line Extension Allowance (LEA). The allowance for a non-residential line extension is calculated using the customer's estimated annual consumption. The footnote clarifies that onsite generation is not considered when estimating annual consumption. The same language was added to Rule I, which also includes an extra sheet due to pagination.
- Sheet No. E-7: Language in section 2) formerly listed as a) and b) are deleted requiring the Applicant or Customer to provide an irrevocable Letter of Credit or a surety bond in an amount equal to the deposit. This language is redundant given section 2) c) includes a "security satisfactory to the Company" (which could include a letter of credit or surety bond).

Conclusion

After review, Staff concludes that the revisions filed by PGE are appropriate. By their housekeeping nature, none of the revisions affect customers' rates or tariff eligibilities. Staff identified no issues or errors with the filing and recommends the Commission approve the tariff changes as filed, allowing the housekeeping revisions to go into effect for service on and after December 4, 2019. No requests for information were sent to the Company as the filing was self-explanatory and included the necessary documentation.

PROPOSED COMMISSION MOTION:

Approve Portland General Electric's Advice No.19-19, for service on and after December 4, 2019.

Advice No. 1029/19-19