

ITEM NO. CA5

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: May 4, 2021**

REGULAR _____ CONSENT X EFFECTIVE DATE May 5, 2021

DATE: April 26, 2021

TO: Public Utility Commission

FROM: Eric Shierman

THROUGH: Bryan Conway, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1252/Advice No. 21-06)
Update to Schedule 50 definition of station.

STAFF RECOMMENDATION:

The Public Utility Commission of Oregon (OPUC or Commission) should approve Portland General Electric Company's (PGE or Company) Advice No. 21-06.

DISCUSSION:

Issue

Whether the Commission should approve Advice No. 21-06, PGE's proposal to expand the definition of a "station" for Schedule 50 in a way that will allow the terms of the schedule to cover sites without direct current quick charging (DCQC). Schedule 50 is PGE's tariff for Company-owned public charging stations.

Applicable Rule

Under ORS 757.205(1):

Every public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules which shall be open to public inspection, showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, or for any

service in connection therewith or performed by any public utility controlled or operated by it.

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable. ORS 757.210. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

Filings that propose 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 change. ORS 757.220; OAR 860-022-0015. Tariff filings to be effective on less than 30 days following notice of the change may be authorized with a waiver of less than statutory notice pursuant to ORS 757.220 and OAR 860-022-0020.

OAR 860-022-0030(1) further requires that for tariff or schedule filings proposing increased rates, the utility must for each separate schedule:

- Identify the total number of customers affected;
- The total annual revenue derived under the existing schedule and the amount of estimated revenue which will be derived from applying the proposed schedule;
- The average monthly use and resulting bills under both the existing rates and the proposed rates that will fairly represent the application of the proposed tariff or schedules; and
- The reasons or grounds relied upon in support of the proposed increase.

Analysis

Background

On November 20, 2018, the Commission approved PGE's Advice No. 18-11, establishing Schedule 50 as a retail rate for providing electric vehicle service equipment (EVSE) for public use.¹ On March 23, 2021, PGE filed Advice No. 21-06 seeking the first revision of Sheet No. 50-1.

On January 14, 2020, PGE first filed an advice letter proposing Schedule 16, a special tariff for the Company's pole charging demonstration project, which sites EVSE on distribution poles. At the February 25, 2020 Public Meeting, Staff recommended the Commission approve this proposal, provided that the terms of offering the service for

¹ See Docket No. ADV 831, OPUC, RE: Docket No. ADV 831, Advice No. 18-11, November 27, 2018, p 1.

free expire on December 15, 2020. The Commission adopted Staff's recommendation.² PGE has since requested, and the Commission has approved, two extensions of Schedule 16's terms, which offer these services at no cost to the EV operator.³

In a meeting with Staff on February 9, 2021, to discuss the second extension of Schedule 16's terms, PGE explained that the City of Portland (City) had reservations about PGE using the terms of Schedule 50 for EVSE mounted on distribution system poles. PGE said the City believes the cost of fueling at public charging stations is too high generally.

Implications for the Pole Charging Demonstration Pilot

As Schedule 50's tariff sheet was written, a "station" has been defined as "the location of a PGE charging facility, consisting of one or more DCQC, and one or more Level 2 Chargers, co-located on the same site".⁴ Advice No. 21-06 would change that definition to "the location of a PGE charging facility, consisting of one or more DCQC and/or Level 2 Chargers".⁵ Only Level 2 EVSE have been sited on distribution system poles in PGE's service territory. Therefore, Schedule 50 has not applied to the Company's pole charging demonstration project up to this point.

If the Commission approves this advice letter, Schedule 50 will cover those pole-mounted sites along with Schedule 16, from May 5, 2021 to October 1, 2021. When Schedule 16 expires on October 1, 2021, the applicable terms of service at these sites will become those of Schedule 50. At a meeting with PGE on April 12, 2021, PGE explained to Staff that this is the Company's intent.

Staff finds no problem with the use of Schedule 50 for the terms of service for the pole charging demonstration project. Staff met with transportation officials at the City of Portland to explain the implications of this advice letter's change in definition. The City voiced no objection to Staff about this change. The City explained to Staff that the City of Portland has no general objection to the terms of Schedule 50. The City has asked PGE to look into creating a low-income subscription program. The desired intent would be to improve the value proposition of electric vehicles for low-income consumers. After receiving clarification from the City, Staff makes its recommendation to the Commission with the understanding that no known stakeholders object to PGE's Advice No. 20-06.

² See Docket No. ADV 1081, OPUC, RE: Advice No. 20-02, February 25, 2020, p 1.

³ See Docket No. ADV 1081, OPUC, RE: Advice No. 20-32, December 1, 2020, p 1; See Docket No. ADV 1081, OPUC, RE: Advice No. 21-02, March 9, 2021, p 1.

⁴ PGE Sheet No. 50-1.

⁵ See Docket No. ADV 1252, PGE, Advice No. 21-06, March 23, 2021, p 3.

Conclusion

Staff recommends the Commission approve this change in the definition of “station” for Schedule 50. This will have the effect of raising rates for the pole charging demonstration project. Staff finds no stakeholder opposition to begin studying demand for this new product under PGE’s standard price for retail EVSE service.

PROPOSED COMMISSION MOTION:

Approve PGE’s Advice No. 21-06, PGE’s proposal to expand the definition of a “station” for Schedule 50.