

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: July 12, 2022**

REGULAR **CONSENT** **EFFECTIVE DATE** July 13, 2022

DATE: July 5, 2022

TO: Public Utility Commission

FROM: Joe Abraham

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

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket Nos. UE 405/Advice No. 21-38 and ADV 1342/Advice No. 21-38)
Schedule 136 Oregon Community Solar Program Cost Recovery
Mechanism Update.

STAFF RECOMMENDATION:

This is an informational filing with no recommendation for the Commission.

DISCUSSION:

Issue

Update on timeline for Staff recommendation on a joint-utility method for calculating the incremental cost of subscribed energy in the Community Solar Program (CSP or Program).

Applicable Rule or Law

ORS 757.205(1) provides as follows:

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.

ORS 757.210 establishes a hearing process to address utility filings and requires rates be fair, just, and reasonable.

ORS 757.215 authorizes the Commission to suspend tariffs filed by utilities for further investigation. The filed tariffs are not effective during suspension.

OAR 860-022-0025 requires that new tariff filings include statements showing the new rates, the number of customers affected, the impact on annual revenue, and the reasons supporting the proposed tariff.

OAR 860-022-0030 requires that tariff filings that name increased rates include additional requirements to OAR 860-022-0025 and necessitate statements for each separate schedule.

ORS 757.386 permits the utilities to recover costs associated with a Community Solar Program Power Purchase Agreement.

In Order No. 20-173, the Commission directed PGE to file new proposed tariff sheets along with support for its methodology for identifying bill credit related costs.

In Order No. 21-451, Staff noted the Commission had not yet approved a method for calculating the incremental cost of subscribed energy. The Commission also adopted Staff's recommendation to convene PGE, PacifiCorp (PAC), and Idaho Power Company (IPC) for their development of a joint-utility methodology to calculate the costs of subscribed energy within the Program.

In Order No. 22-210, the Commission adopted Staff's recommendation to suspend advice No. 21-38 to investigate a joint utility method for calculating the incremental cost of subscribed energy in the Community Solar Program.

Analysis

Background

In Staff's memo at the April 5, 2022, public meeting,¹ Staff recommended suspending Advice No. 21-38 to allow time for Staff to investigate a joint-utility method for calculating the incremental cost of subscribed energy in the Program. In the memo, Staff also indicated it would bring a recommendation on this method to the Commission within 90 days of the effective date, April 20. In the ensuing period, Staff made good progress with PGE, PAC, and IPC in the development of a joint-utility method but

¹ Staff memo CA1 for April, 20, 2022 Public Meeting.
<https://edocs.puc.state.or.us/efdocs/HAU/adv1342hau124025.pdf>.

recognized more time was needed to bring a recommendation to the Commission. Order No. 22-210,² which was issued on June 3rd and adopted Staff's recommendation from the April 5, 2022, public meeting, suspending this advice filing (Advice No. 21-38) for a period of six months or less beginning April 20, 2022.

Staff appreciates continued efforts by the utilities to progress toward a joint-utility method for calculating the incremental cost of subscribed energy in the Program. Staff has reviewed the utilities' proposals and expects to post a draft recommendation on a joint-utility method for public comment in Docket No. UM 2247 in July and bring a recommendation to the Commission at a public meeting in August. Staff's recommendation in Docket No. UM 2247 will also address the suspension and investigation of Advice No. 21-38 in ADV 1342. This timing will put Staff's memo approximately thirty-five days after the 90 days Staff initially indicated in its memo on April 5th but sooner than the six-month suspension granted from Order 22-210.

Stakeholder Input

Staff is not aware of stakeholder concern regarding bringing a recommendation on a joint-utility method after the initial 90-day timeline but within the six-month suspension of Advice No. 21-38 in Order 22-210.

Conclusion

Staff reports progress with the utilities in the development of a joint-utility method for calculating the incremental cost of subscribed energy in the Program. In this update, Staff notify the Commission it will bring a recommendation in August and within the six-month suspension of Advice No. 21-38 granted in Order 22-210.

PROPOSED COMMISSION MOTION:

This is an informational only report with no recommendation for the Commission.

² Order No. 22-210. <https://apps.puc.state.or.us/orders/2022ords/22-210.pdf>.