# PUBLIC UTILITY COMMISSION OF OREGON STAFF REPORT

PUBLIC MEETING DATE: September 20, 2022

REGULAR \_\_\_\_ CONSENT X EFFECTIVE DATE \_\_\_\_ January 21, 2022

**DATE:** September 12, 2022

**TO:** Oregon Public Utility Commission

**FROM:** Eric Shierman

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

**SUBJECT:** PORTLAND GENERAL ELECTRIC:

(Docket No. ADV 1422/Advice No. 22-17)

Schedule 50 Electric Avenue retail EV charging update.

## STAFF RECOMMENDATION:

Approve Portland General Electric's (PGE or the Company) Advice No. 22-17, revising Schedule 50 to change charging sites covered by monthly membership and remove payment through an existing bill.

## **DISCUSSION:**

## <u>Issue</u>

Whether the Public Utility Commission of Oregon (Commission) should approve PGE's Advice No. 22-17, which revises Schedule 50 to clarify that customers purchasing electric vehicle (EV) charging services through the tariff's monthly membership can use that membership only for charging sites designated by the Company as Electric Avenue. The revised tariff also removes the payment of this service through an existing PGE bill.

## Applicable Rule or Law

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

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> 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.

## <u>Analysis</u>

## 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 supply equipment (EVSE) for public use. On March 23, 2021, PGE filed Advice No. 21-06 seeking the first revision of Sheet No. 50-1, where the definition of a site was expanded to include those without both direct current fast chargers and Level 2 chargers. The Commission approved that request on May 4, 2021.

Schedule 50 allows EV user to pay for charging in two ways: at the site or by subscription. Subscribers pay a standard price of \$25 per month. Bulk subscriptions can be purchased at the discount price of \$20 per month if bought as 50 subscriptions or more at one time. A subscriber can charge an EV limitlessly at PGE-owned sites and is only required to pay a premium of 19 cents per kWh when charging during peak hours. These are defined as 3 p.m. to 8 p.m. on weekdays, excluding holidays.

## PGE's Proposal

PGE proposed a second revision of Schedule 50 on July 29, 2022, which would add a definition of "Electric Avenue" to the tariff, defined as: "Stations in PGE's service area that are listed as part of Electric Avenue on portlandgeneral.com." References to "at

<sup>&</sup>lt;sup>1</sup> See Docket No. ADV 831, OPUC, Advice Letter, November 27, 2018, p 1.

<sup>&</sup>lt;sup>2</sup> See Docket No. ADV 1020, OPUC, Advice Letter, May 4, 2021, p 1.

<sup>&</sup>lt;sup>3</sup> See Docket No. ADV 1422, PGE, Advice No. 22-17, July 29, 2022, p 4.

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Electric Avenue sites" are inserted in Schedule 50 sentences about the monthly subscription.<sup>4</sup> This will limit the number of sites that a monthly subscription covers under the tariff. Currently, some of PGE's charging sites use a third-party payment software that does not transfer subscription customers' credentials. PGE is working to resolve this technical issue. PGE intends to remove these sites from the list of eligible sites covered by Schedule 50's monthly subscription until the technical problem is resolved.

PGE proposes another subscription-related change. The updated tariff sheet would delete the sentence: "Payment under this schedule may be made through a current PGE bill if the EV User has selected the monthly membership option and is a current Customer" from the rate section. PGE explains this is because the Company has not implemented that payment method. PGE hopes to implement it in the future.

Staff finds PGE's proposal reasonable. The proposed revisions will align the tariff with actual barriers for monthly subscribers at some sites and no longer reference a payment option that PGE's billing system cannot handle. This is not an intentional change in service. Rather, both changes involve a technical problem that PGE is working to resolve. These changes to Schedule 50 add clarity on how PGE bills EV users at PGE's EV charging stations.

## Conclusion

Staff recommends the Commission approve PGE's proposal to limit the number of sites covered by the Company's monthly subscription to Schedule 50 and remove the payment of these monthly subscriptions through an existing PGE bill.

#### PROPOSED COMMISSION MOTION:

Approve PGE's Advice No. 22-17, revising Schedule 50 to change charging sites covered by monthly membership and remove payment through an existing bill.

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<sup>&</sup>lt;sup>4</sup> See Docket No. ADV 1422, PGE, Advice No. 22-17, July 29, 2022, p 5.