

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: May 16, 2023

REGULAR X CONSENT EFFECTIVE DATE May 17, 2023

DATE: May 9, 2023

TO: Public Utility Commission

FROM: Charles Lockwood

THROUGH: Caroline Moore **SIGNED**

SUBJECT: PACIFIC POWER:
(Docket No. ADV 1493/Advice No. 23-009)
Updates Schedules 117 and 118, Transportation Electrification Residential
Charging Pilot and Nonresidential Charging Pilot.

STAFF RECOMMENDATION:

Approve Pacific Power's (PacifiCorp or Company) proposed updates to Schedule 117 and Schedule 118, Transportation Electrification Residential Charging Pilot and Nonresidential Charging Pilot, as described in Advice No. 23-009, effective for service rendered on and after May 17, 2023.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve PacifiCorp's Advice No. 23-009, which updates its Schedule 117 and Schedule 118, Transportation Electrification Residential Charging Pilot and Nonresidential Charging Pilots, introducing an incentive for 240-volt (V) wall outlets, increasing incentive amounts for income eligible customers, adding a cap on the number of ports eligible for a rebate, and minor housekeeping language changes.

Applicable Rule

ORS 757.205 requires public utilities to file schedules showing all rates, tolls, and charges for service that have been established and are in force at the time. Pursuant to

ORS 757.210, the Commission may approve tariff changes if they are deemed to be fair, just, and reasonable.

OAR 860-087-0020(1) provides that the objective of a TE Plan is to “integrate the electric company’s transportation electrification actions into one document” and “act as a summary of the electric company’s [TE] investments and activities.”

OAR 860-087-0020(2)(f) allows electric companies to propose TE Plan updates at any time between scheduled TE Plan filings. Electric companies are required to file a TE Plan update for any material changes. OAR 860-087-0020(2)(f) defined “material change” as any new TE program or infrastructure measure applications, or program or infrastructure measure changes that require new incremental ratepayer dollars.

Analysis

Background

In Docket No. ADV 1288/Advice No. 21-016, the Commission approved the launch of two new rebate programs through Schedules 117 and 118: the Residential Charging Pilot and the Nonresidential Charging Pilot. To align with the Commission’s recommendation to prioritize funding streams in Order No. 21-484, PacifiCorp proposed to fund the pilot programs using the Company’s Monthly Meter Charge Budget in Docket No. UM 2056.

Through the Company’s 2022 Monthly Meter Charge Budget, PacifiCorp proposed and was approved to increase the maximum available for the income qualified incentive rebate to \$1,000 and multifamily incentive rebate to \$3,000. PacifiCorp increased incentive rebates to best support underserved communities in adopting and installing qualified Level 2 (L2) chargers. In the 2022 Monthly Meter Charge Budget, the Company also noted the possibility of increasing incentives additionally if needed after conducting a meta-analysis comparing utility incentives and true costs of installation.

On February 14, 2023, PacifiCorp filed its Draft 2023 Oregon TE Plan, with a currently projected public hearing and Commissioner work session scheduled for July 11, 2023. On April 4, 2024, PacifiCorp filed Advice No. 23-009/Docket No. ADV 1493, to modify Schedules 117 and 118. PacifiCorp’s Draft 2023 Oregon TE Plan does not explicitly mention the Schedules 117 and 118 changes proposed in ADV No. 23-009.

PacifiCorp’s Proposed Changes

In Advice No. 23-009/ADV 1288, PacifiCorp proposes several modifications to Schedule 117. First, PacifiCorp proposes to offer a new incentive of up to \$250, or up to \$500 for income-qualified residential customers, to install a 240 V outlet for electric

vehicle (EV) charging equipment. The Company proposes this incentive due to the feedback of customers interested in participating in the program that the EV they purchased came with a L2 charger.

Second, the Company proposes to increase the maximum Income Eligible Rebate for L2 chargers from \$1,000 to \$1,500. By increasing the value of the Income Eligible Rebate to \$1,500, PacifiCorp hopes to increase income eligible participation in the program and cover 100 percent of eligible costs for most customers that participate.

Lastly, the Company proposes to streamline the language used to describe the Income Eligible Rate.

The Company also proposes several changes to Schedule 118. First, the Company seeks to increase the available incentive for multi-unit family dwellings (MUDs) from \$3,000 to \$4,500. The Company has only received one application from MUD customers since the launch of the rebate program, and believes the increased incentive paired with a targeted promotional campaign will increase MUD program participation and make L2 charging stations more accessible to the renter customers.

Second, the Company seeks to add language to Schedule 118 capping the number of charging ports for an L2 EVSE installation that can qualify for a rebate. For the Standard Electric Vehicle Supply Equipment (EVSE) Installation Rebate the Company is proposing a cap of six ports and a cap of 12 ports for the MUD Eligible EVSE Installation Rebate. PacifiCorp notes the caps are an important part of the program that will help the funds benefit many customers throughout the Company's Oregon service area instead of helping a few customers fully build larger charging sites.

Lastly, the Company is including a minor housekeeping change to include two schedules, Schedules 29 and 30, General Service Time-Of-Use Delivery Service, and General Service Large Nonresidential 201 KW to 999 KW Delivery Service, to the Applicable section, as the schedules were inadvertently excluded from the initial filing.

Staff Analysis

Staff has reviewed PacifiCorp's proposed changes to Schedules 117 and 118 and found that the changes are supported by the Company's approved and pending TE Plan budgets, do not require an updated TE plan, and are reasonable to promote the Company's TE programming. However, Staff notes that it is awkward for the Company to propose these changes in an individual advice filing while the Company has a TE Plan pending before the Commission.

First, Staff reviewed the Company's approved 2020 TE Plan, 2022 Monthly Meter Charge Budget, and pending 2024 Draft TE Plan's budgets and found that the proposed program changes do not impact the current or proposed TE Plan budget. Staff found that the company has a surplus of remaining funds, in addition to funding for 2023, to utilize for any incentive rebates between now and the Commission's decision on the pending TE Plan. Staff also notes that while the 2024 Draft TE Plan does not explicitly mention the changes to Schedules 117 and 118, the proposed budget includes the cost of these changes.

Second, the changes to Schedules 117 and 118 are not "material changes" as defined by OAR 860-087-0020(2)(f). Because the changes are not new TE programs or infrastructure measure applications, but rather changes to an existing measure, and do not require new incremental ratepayer dollars, these changes do not require the Company to file a TE Plan update for Commission acceptance.

Lastly, Staff believes these changes are reasonable to increase access and economic viability of home charging for residential customers. The new 240 V outlet rebate should further reduce costs of charging an EV at home and increase customer participation in the Company's TE programming. Likewise, the caps on charging ports are an important part of the program that will help the funds benefit many customers and spread EV charging throughout Oregon, instead of helping a few customers fully build larger charging sites.

While Staff supports the program improvements generally, Staff seeks to limit utilities from proposing changes in individual advice filings while the Company has a TE Plan pending approval before the Commission. As noted above, the purpose of the TE Plan is to integrate all of the Company's TE actions into one document. PacifiCorp should include such changes in its TE Plan to increase transparency and stakeholder involvement. Staff plans to request that the Company update their proposed TE Plan to more explicitly reflect the changes proposed in this advice filing through supplemental comments in the Company's TE Plan docket, Docket No. UM 2056.

Conclusion

Staff finds that the incentive increases and language updates in Schedules 117 and 118 are aligned with the Company's current and proposed funding, do not constitute a material change, and are in line with Commission directive, and therefore, recommends that the Commission approve the proposed tariffs.

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Staff plans to request that the Company update their current pending TE Plan in Docket No. UM 2056 to include all changes for transparency and consistency with the goals of TE Plan development and review.

PROPOSED COMMISSION MOTION:

Approve PacifiCorp's proposed updates to Schedule 117 and Schedule 118, Transportation Electrification Residential Charging Pilot and Nonresidential Charging Pilot, as described in Advice No. 23-009, effective for service rendered on and after May 17, 2023.

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