



Portland General Electric
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portlandgeneral.com

March 2, 2022

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street S.E., Suite 100
P.O. Box 1088
Salem, OR 97308-1088

RE: Advice No. 22-03, Schedule 7 and 32 Residential and Small Commercial Renewable Portfolio Option Update

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes (OARs) 757.205 and 757.210, and Oregon Administrative Rules (OARs) 860-022-0025 and 860-022-0030, for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **June 1, 2022**:

- Third Revision of Sheet No. 7-7
- Second Revision of Sheet No. 7-8
- Second Revision of Sheet No. 7-9
- Original Sheet No. 7-10
- Ninth Revision of Sheet No. 32-2
- Eighth Revision of Sheet No. 32-3
- Fifth Revision of Sheet No. 32-6
- First Revision of Sheet No. 32-7

PGE seeks to revise the Green Future Renewable Portfolio Options for Schedule 7 and 32 to update the price associated with the Renewable Fixed Option and the Renewable Usage Option. In addition to the pricing update, PGE is revising the Renewable Fixed Option to align with the Renewable Usage Option and eliminate the fixed contribution to the Renewable Development Fund (RDF). Instead of the fixed contribution, PGE will transfer any remaining funds leftover after program and administrative costs to the RDF each year. This ensures that the Green Future Block program covers the full cost of marketing while also ensuring that the Renewable Development Fund has a capacity to fund \$1 million in projects annually. With this change, pricing is more streamlined and straightforward to explain to customers. PGE also requests to transfer funds remaining for the renewable portfolio options from 2020 and 2021 to the RDF.

These changes are being made in both Schedules 7 and 32 to provide consistency between the programs as they follow the same guidelines and provide a streamlined experience for customers by differentiating along the lines that create the most value for customers – variable or fixed rate.

This simplification of the existing suite of products will allow them to be more intuitive while taking up less space – leaving room for more visibility of all the options available to customers (as compared with 20+ years ago when these products originally launched).

PGE respectfully requests that the Commission approve these rates by April 19, 2022 so that customer communications can be sent prior to the rate effective date of June 1, 2022.

In addition to the changes requested herein, PGE anticipates interest in discussing Citizen Utility Board's (CUB) proposal made in UE 394 to explore an expansion of the Habitat Support option eligibility via UM 1020 and recommend that the changes requested herein not be delayed by the potential outcome of the discussion that would invite additional stakeholders to contribute. PGE looks forward to engaging stakeholders in this conversation in the future, but at this juncture, these changes are time sensitive due to the need to update customer prices for portfolio options and PGE respectfully requests that these conversations take place subsequent to this tariff update.

In addition to the tariff filing, PGE is submitting the annual cost allocation audit as an attachment to this filing to satisfy the requirements of Order No. 15-356 in UE 294.

To satisfy the requirements of OARs 860-022-0025(2) and 860-022-0030, PGE provides the following response:

The changes increase participant rates by \$0.0014 per kWh for renewable usage customers and decrease rates \$0.62 per 200 kWh block for renewable fixed option customers – this change is to align the price of renewable fixed option with renewable usage. The average residential customer on the renewable usage option will see their bill increase by approximately \$1.11 per month. An average small commercial customer on the renewable usage option will see their bill increase by approximately \$1.89 per month. This program is optional and self-funded and has no impact on Cost of Service Rates.

Please direct questions or comments regarding this filing to Casey Manley at (503) 464-8258. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosures

SCHEDULE 7 (Continued)

GREEN FUTURESM RENEWABLE PORTFOLIO OPTIONS (Continued)

Energy or Renewable Energy Certificates (RECs), as defined in Rule B of this tariff, supporting the Green FutureSM will be acquired by the Company such that by March 31 of the succeeding year, the Company will have received sufficient RECs or renewable energy to meet the purchases by Customers. For the renewable fixed and renewable usage options, the Company is not required to own renewables or to acquire Energy from renewable resources simultaneously with Customer usage.

For purposes of these options, renewable resources include wind, solar, biomass, low impact hydro (as certified by the Low Impact Hydro Institute) and geothermal energy sources used to produce electric power. All RECs will be Green-e® Energy certified by the Center for Resource Solutions (CRS).

(T)
(C)
(C)

RENEWABLE FIXED OPTION

The Company will use funds received under this option to cover program costs and purchase 200 kWh of RECs and/or renewable energy per block enrolled in the renewable fixed option. All RECs purchased under this option will come from new renewable resources.

(C)

The Company will also place any funds not spent after covering program and REC costs received from Customers enrolled in this option in a renewable resources development and demonstration fund ("Renewable Development Fund" or "RDF"). See Special Conditions for additional details on the RDF.

(C)
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(C)
(M)

Monthly Rate

Renewable Fixed Option \$1.88 per month per block

(R)

SCHEDULE 7 (Continued)

GREEN FUTURESM RENEWABLE PORTFOLIO OPTIONS (Continued)

RENEWABLE USAGE OPTION

Amounts received from Customers under the renewable usage option will be used to cover program costs and acquire RECs and/or Energy, all of which will come from new renewable resources. (C)
(C)

The Company will place any funds received from Customers enrolled in this option that are not spent after covering program and REC costs in a renewable resources development and demonstration fund ("Renewable Development Fund" or "RDF"). See Special Conditions for additional details on the RDF. (C)
(C)

Monthly Rate

Renewable Usage Option	0.940	¢ per kWh in addition to Energy Charge	(I)
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RENEWABLE SOLAR OPTION

The renewable solar option allows participating Customers, monthly, to support a PGE sponsored utility-scale solar power plant and its renewable attributes. The Company will purchase 1 kW of the output and RECs from new solar facilities connected to the Company's electric grid per unit enrolled in renewable solar option.

In exchange for the Customer's payment of \$5.00 per unit per month, the Customer receives the environmental attributes from a local utility-scale solar project and the utility-scale solar project produces 1 kW of Energy which flows into the grid. Typical purchases may range to the equivalent of a 1, 2, or 3 kW solar panel array. At the end of each year, the Company will provide individual results to the Customer, reporting how much the Customer's Energy usage was offset by solar power and the carbon footprint reduction benefit received. The RECs purchased by the Customer will be retired on behalf of the Customer.

Monthly Rate

Renewable Solar Option	\$5.00	per unit in addition to Energy Charge	(M)
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SCHEDULE 7 (Continued)

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GREEN FUTURESM RENEWABLE PORTFOLIO OPTIONS (Continued)

RENEWABLE HABITAT OPTION ADDER (HABITAT SUPPORT)

The Company will distribute \$2.50 per month as received from each Customer enrolled in habitat support to a nonprofit agency chosen by the Company who will use the funds for habitat restoration.

Available

Only Customers who are enrolled in a Green FutureSM Renewable Portfolio option, described in this schedule, may choose habitat support.

Monthly Rate

Habitat Support	\$2.50	per month
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SPECIAL CONDITIONS RELATED TO GREEN FUTURESM RENEWABLE PORTFOLIO OPTIONS

1. Service will become effective with the next regularly scheduled meter reading date provided the Customer has selected the option at least five days prior to their next scheduled meter read date. Absent the five-day notice, the change will become effective on the subsequent meter read date. Service may be terminated at the next regularly scheduled meter reading provided the Company has received two weeks' notice prior to the meter read date. Absent the two-week notice, the termination will occur with the subsequent meter reading date.
2. The Company, in its discretion, may accept participation from accounts that have a time payment agreement in effect, or have received two or more final disconnect notices. However, the Company will not accept participation from accounts that have been involuntarily disconnected in the last 12 months.
3. The Company will use reasonable efforts to ensure energy assistance dollars from the Oregon Low Income Home Energy Assistance Program (LIHEAP) and Oregon Energy Assistance Program (OEAP) assistance programs are not used to cover Green Future program participation during the time which participants receive these energy assistance funds. As such, PGE will unenroll Customers from the Green FutureSM program if they receive energy assistance funds from LIHEAP and OEAP. If these energy assistance dollars are no longer applied to the bill, the Customer may re-enroll in the program subject to the above requirements.

(M)

SCHEDULE 7 (Concluded)

SPECIAL CONDITIONS RELATED TO GREEN FUTURESM RENEWABLE PORTFOLIO
OPTIONS (Continued)

4. The Company will use reasonable efforts to acquire renewable energy but does not guarantee the availability of renewable energy sources to serve Green FutureSM Renewable Portfolio Options. The Company makes no representations as to the impact on the development of renewable resources or habitat restoration projects of Customer's participation. (M)
5. Enrollment into renewable solar option: Customer agrees to participate for no fewer than 12 months.
6. Amounts in the RDF will be disbursed by the Company to non-residential renewable resource demonstration projects or projects that commit to supply Energy according to a contractually established timetable. The Company will report to the Commission annually by March 15th, pursuant to Order No. 16-156, on collections and disbursements for the preceding calendar year. The annual report will include a list of projects that received or were allocated RDF funding. (T)
7. Amounts placed in the RDF prior to July 6, 2016 will accrue interest at the Commission-authorized cost of capital until disbursed. Amounts placed in the fund on and after July 6, 2016 will accrue interest at the Commission-authorized rate for deferred accounts in amortization until disbursed. Amounts within the fund will be disbursed on a first-in-first-out basis. Once funds have been committed to projects, following the required OPUC review, they will be deemed disbursed. Funds deemed disbursed and still held by the Company, will accrue interest at the Commission-authorized rate for deferred accounts in amortization. (T)

ADJUSTMENTS

Service under this schedule is subject to adjustments approved by the Commission. Adjustments include those summarized in Schedule 100. (M)

SCHEDULE 32 (Continued)

MONTHLY RATE (Continued)

Renewable Portfolio Options

(available upon enrollment in either Energy Charge option)

Renewable Usage	0.940	¢ per kWh in addition to Energy Charge	(I)
Renewable Fixed	\$1.88	per month per block	(R)
	\$5.00	per unit in addition to Energy Charge	
	\$2.50	per month	

* Only Customers who are enrolled in a Renewable Portfolio Option (Renewable Usage or Renewable Fixed or Renewable Solar Portfolio Options described herein) may choose the Renewable Habitat Portfolio Option Adder.

RENEWABLE PORTFOLIO OPTIONS

The Customer will be charged for the Renewable Portfolio Option in addition to all other charges under this schedule for the term of enrollment in the Renewable Portfolio Option.

Renewable Fixed Option

The Company will use funds received under this option to cover program costs and purchase 200 kWhs of Renewable Energy Certificates (RECs) and/or renewable energy per block enrolled in the Renewable Fixed Option. All RECs purchased under this option will come from new renewable resources. (C)
(T)

The Company will also place any funds not spent after covering program and REC costs received from Customers enrolled in this option in a renewable resources development and demonstration fund ("Renewable Development Fund" or "RDF". See Special Conditions for additional details on the RDF. (C)
(C)

(M)

SCHEDULE 32 (Continued)

RENEWABLE PORTFOLIO OPTIONS (Continued)

Renewable Usage Option

Amounts received from Customers under the Renewable Usage Option will be used to cover program costs and acquire RECs and/or renewable energy, all of which will come from new renewable resources. (C)
(C)

The Company will also place any funds received from Customers enrolled in this option not spent after covering program and REC costs in a renewable resources development and demonstration fund ("Renewable Development Fund" or "RDF"). See Special Conditions for additional details on the RDF. (C)
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(C)

Renewable Solar Option

The Renewable Solar Option allows participating Customers, on a monthly basis, to support a PGE sponsored utility-scale solar power plant and its renewable attributes. The company will purchase 1 kW of the output and RECs from new solar facilities connected to the Company's electric grid per unit enrolled in the Renewable Solar Option.

In exchange for the Customer's payment of \$5.00 per unit per month, the Customer receives the environmental attributes from a local utility-scale solar project and the utility-scale solar project produces 1kW of energy which flows into the grid. Typical purchases may range to the equivalent of a 1, 2, or 3-kW solar panel array. At the end of each year, PGE will provide individual results to the Customer, reporting how much the Customer's energy usage was offset by solar power and the carbon footprint reduction benefit received. The RECs purchased by the Customer will be retired on behalf of the Customer.

Renewable Habitat Adder

The Company will distribute \$2.50 per month as received from each Customer enrolled in the Habitat Option to a nonprofit agency chosen by the Company who will use the funds for habitat restoration.

Energy or RECs supporting the Renewable Portfolio Options will be acquired by the Company such that by March 31 of the succeeding year, the Company will have received sufficient RECs or renewable energy to meet the purchases by Customers. For Renewable Fixed Option and Renewable Usage Option, the Company is not required to own renewables or to acquire energy from renewable resources simultaneously with Customer usage.

For purposes of these options, renewable resources include wind, solar, biomass, low impact hydro (as certified by the Low Impact Hydro Institute) and geothermal energy sources used to produce electric power. All RECs will be Green-e® Energy certified by the Center for Resource Solutions (CRS). (C)
(C)
(C)

SCHEDULE 32 (Continued)

SPECIAL CONDITIONS (Continued)

2. The Company, in its discretion, may accept enrollments on accounts that have a time payment agreement in effect, or have received two or more final disconnect notices. However, the Company will not accept enrollments on accounts that have been involuntarily disconnected in the last 12 months.
3. The Company will use reasonable efforts to acquire renewable energy, but does not guarantee the availability of renewable energy sources to serve Renewable Portfolio Options. The Company makes no representations as to the impact on the development of renewable resources or habitat restoration projects of Customer participation.
4. Enrollment into the Renewable Solar Option, the customer agrees to participate for no less than 12 months. (T)
5. Amounts in the RDF will be disbursed by the Company to non-residential renewable resource demonstration projects or projects that commit to supply Energy according to a contractually established timetable. The Company will report to the Commission annually by March 15th, pursuant to Order No. 16-156, on collections and disbursements for the preceding calendar year. The annual report will include a list of projects that received or were allocated RDF funding. (M)(T)
6. Amounts placed in the RDF prior to July 6, 2016 will accrue interest at the Commission-authorized cost of capital until disbursed. Amounts placed in the fund on and after July 6, 2016 will accrue interest at the Commission-authorized rate for deferred accounts in amortization until disbursed. Amounts within the fund will be disbursed on a first-in-first-out basis. Once funds have been committed to projects, following the required OPUC review, they will be deemed disbursed. Funds deemed disbursed and still held by the Company, will accrue interest at the Commission-authorized rate for deferred accounts in amortization. (T)

Pertaining to TOU Option

1. Service may be terminated at the next regularly scheduled meter reading provided the Company has received notice two weeks prior to the meter read date. Absent the two-week notice, the termination will occur with the next subsequent meter reading date.
2. Participation requires a one-year commitment by the Customer. Generally, if a Customer requests removal from the TOU Option, the Customer will be required to wait 12 months before re-enrolling. However, a Customer may request to reinstate service within 90 days of termination, in which case the Portfolio Enrollment Charge will be waived.

(M)

SCHEDULE 32 (Concluded)

Pertaining to TOU Option (Continued)

3. The Customer must take service at 120/240 volts or greater. Single phase 2-wire grounded service is not eligible because of special metering requirements.
4. The Customer must provide the Company access to the meter on a monthly basis.
5. At the end of the Customer's first 12 months of service under the TOU Option, the Company will calculate what the Customer would have paid under Standard Service and compare billings. If the Customer's Energy Charge billings (including all applicable supplemental adjustments) under the TOU Option exceeded the Standard Service Energy Charge (including all applicable supplemental adjustments) by more than 10%, the Company will issue the Customer a refund for the amount in excess of 10% either as a bill credit or refund check. No refund will be issued for Customers not meeting the 12-month requirement.
6. The Company will recover lost revenue from the TOU Option through Schedule 105.
7. Billing will begin for any Customer on the next regularly scheduled meter reading date following the initialization meter reading made on a regularly scheduled meter reading date.
8. The Company may choose to offer promotional incentives, including but not limited to rebates or coupons.

(M)

(M)

TERM

Service will be for not less than one year or as otherwise provided under this schedule.

PGE Advice No. 22-03
Attachment

PGE's 2020 Cost Allocation Audit Results

Pursuant to OPUC Order No. 13-356, PGE hereby provides a summary of the cost allocation audit performed. In the absence of the Portfolio Options Committee, PGE submits this summary as an attachment to Advice Filing No. 22-03. Table 1 provides a summary of 2020 program revenues, total program administrative costs, and costs as a percentage of program revenues.

Administrative costs include but are not limited to: Time spent by customer service representatives speaking with customers about the programs and processing enrollments, creating badges for vendors, creating and executing customer mailing lists, surveys, and program reports, developing and deploying media, making regulatory filings, negotiating contracts, among other administrative tasks. PGE's Internal Audit team reviewed the results of the program's self-audit and found them to be consistent with their findings.

Program Revenues in 2020	\$15,866,019
Actual Program Expenses in 2020	\$181,014
% of Revenue allocated for internal costs	1.14%

Table 1