

May 28, 2015

Public Utility Commission of Oregon Attn: Filing Center 3930 Fairview Industrial Drive SE P.O. Box 1088 Salem, OR 97308-1088

RE: Advice No. 15-15, Schedule 341 Energy Efficiency Upgrade Voluntary On-Bill Repayment Service

Portland General Electric (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and OAR 860-022-0025 for filing proposed tariff sheets associated with P.U.C. No. 18, with a requested effective date of **July 8, 2015**:

First Revision of Sheet No. 341-1

PGE hereby submits an amendment to Schedule 341, an optional On-Bill Repayment Service to Customers who have obtained energy efficiency upgrade financing offered through programs managed by the Energy Trust of Oregon (ETO).

The change is requested and supported by the ETO.

Currently, the on-bill service under Schedule 341 is available to Customers who are owners of buildings or dwellings in which the primary source of heat is electricity. PGE seeks to open eligibility to Customers who are owners of multifamily buildings or dwellings but not require the building to be heated with electricity. PGE is submitting this change to align the tariff with the specified conditions in the PGE/ETO Voluntary On-Bill Operating Agreement to facilitate customer participation in ETO programs.

The PGE/ETO Operating Agreement requires that for the multifamily program, "Program loans will integrate on-bill repayment service by the utility to which Energy Trust claims the majority of energy savings from which the project that is being financed." PGE is expecting on-bill repayment participation requests for lighting only projects in multifamily buildings that are not heated with electricity. For these projects, the ETO reports the energy savings to PGE for the benefit of PGE Customers.

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PGE's proposed tariff language provides the following eligibility:

"To Owners, who are the Customer of Record, of dwellings and/or buildings where Electricity is provided by the Company."

For purposes of OAR 860-022-0025, PGE provides the following response:

- a) There is no price or rate increase being proposed with this change, therefore, OAR 860-022-0030 does not apply to this filing. PGE is proposing a change in eligibility for on-bill financing.
- b) There is no annual change in revenue as the tariff change is directed only to eligible customers. Eligible customers include all customers who own dwellings or buildings. Of its total customers, PGE does not have records identifying customers who own or rent the dwelling or building.
- c) The proposed change assists the ETO in increasing customer participation in its programs.

Should you have any questions or comments regarding this filing, please contact me at (503) 464-8718 or Terri Bowman at (503) 464-8854.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

Karla Wenzel

Manager, Pricing & Tariffs

Enclosure

SCHEDULE 341

ENERGY EFFICIENCY UPGRADE VOLUNTARY ON-BILL REPAYMENT SERVICE

PURPOSE

This Schedule describes the general terms of the On-Bill Repayment Service that allows Customers, who have obtained energy efficiency upgrade financing offered through programs managed by the Energy Trust of Oregon, with repayment of the financed amount on the Customer's Electricity bill. This Service enables Customers access to low-cost, long-term financing provided by a third party financial institution for installed energy efficiency measures with the repayment amount included and separately stated on the participating Customer's Electricity bill as "Energy Upgrade Loan."

AVAILABLE

To Owners, who are the Customer of Record, of dwellings and/or buildings where Electricity is provided by the Company.

APPLICABLE

To Customers who have obtained an energy efficiency loan offered through programs managed by Energy Trust.

SERVICE DESCRIPTION

Energy Trust, will offer financing provided by a third party financial institution to participating Customers and will act as a program coordinator. PGE will bill repayment of the loan offered by the Energy Trust on the participating Customer's Electricity bill. PGE will then remit the collected Customer repayments received to Energy Trust or financial institution, designated by the Energy Trust, and communicated to PGE in writing.

Energy Trust through a third party with which Energy Trust contracts, is responsible to qualify Customers for the loan and repayment service and establish a contract with the Customer for repaying the loan. Energy Trust will obtain and provide to the Company, the participating Customer's written authorization that allows the repayment amount to be placed on the Customer's Electricity bill and for the Company to share the participating Customer's account payment and credit history with Energy Trust as needed, on an ongoing basis.

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