



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

December 7, 2020

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

**RE: Advice No. 20-45, Schedule 25, Nonresidential Direct Load Control Pilot,
Non-Ducted Demonstration with Flair Pucks**

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rule (OAR) 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **January 13, 2021**:

Fourth Revision of Sheet No. 25-2
Sixth Revision of Sheet No. 25-4

PGE has added language to Schedule 25 to accommodate a demonstration of Non-Ducted Thermostats within the Smart Grid Test Bed (SGTB). This demonstration will be limited to no more than 100 Flair Pucks, which will enable PGE to remotely control non-ducted HVAC systems during seasonal events called by the Direct Load Control Pilot (Schedule 25). Ductless Heat Pumps (DHP) are the primary target of the demonstration, however, other qualified systems may include window AC units, electric boilers, and package terminal units. This demonstration will coincide with DHP residential pilot (cofounded by PGE and Energy Trust) and will leverage existing infrastructure to ensure units are properly installed and enabled. Unlike Schedule 25, Flair Pucks will be installed by the customer instead of program implementor due to the simplicity of the installation. The purpose of this demonstration is to test the demand response impact of non-ducted HVAC systems during events and to capture customer experience learnings, which may inform future pilot design considerations for Schedule 25 and how PGE engages with business customers.

PGE discussed this change with Staff and external stakeholders at the DRCC meeting on December 4, 2020 and is making this filing to update Schedule 25 consistent with that discussion. This change will allow PGE to study non-ducted thermostats in conjunction with and independent of Schedule 25. This update will not impact the Schedule 25 cap of 3,800 thermostats or the timing of the pilot.

To satisfy the requirements of OAR 860-022-0025, PGE responds as follows:

The proposed revisions to Schedule 25, Nonresidential Direct Load Control Pilot, do not increase, decrease, otherwise change existing rates, or impact revenues; costs are being deferred in UM 1976 for later ratemaking treatment.

Please direct questions 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 and Tariffs

Enclosure
cc Kacia Brockman, OPUC

SCHEDULE 25 (Continued)

DEFINITIONS (Continued)

Non-Ducted HVAC System Thermostat Demonstration – A demonstration within the smart grid test bed that meets Special Conditions 8 through 10. Demonstrations are limited in scope and will not interfere with the operations of the Nonresidential DLC Pilot.

(N)
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(N)

Summer Event Season – Includes the successive calendar months June through September.

Winter Event Season – Includes the successive calendar months November through February.

Qualified Thermostat – Thermostats that are Company-approved have been integrated with Company's demand response management system for event calling.

AVAILABLE

In all territory served by the Company.

APPLICABLE

To qualifying Nonresidential Customers served under Schedules 32, 38, 47, 49, 75, 83, 85, 89, and 90. The Company will limit participation to 3,800 Qualified Thermostats. Nonresidential Customers will remain on their base schedule and will be eligible for the incentives described in this schedule.

ELIGIBILITY

Eligible Nonresidential Customers must have a Network Meter. Nonresidential Customers must have a Qualified Thermostat connected to the internet and the heating or cooling system at their expense, except as provided in the Incentives section of this schedule. To participate in the Winter Event Season, the Nonresidential Customer must have a Ducted Heat Pump or Electric Forced Air Heating. To participate in the Summer Event Season, the Nonresidential Customer must have Central Air Conditioning or a Ducted Heat Pump.

DIRECT LOAD CONTROL EVENT

Direct Load Control Events occur for one to five hours. The Company may call two events per day but will not exceed five cumulative hours for the day. During Direct Load Control Events the Customer may allow the Company to control their thermostat for the duration of the event. The Customer has the option not to participate by overriding via the thermostat. The Company initiates Direct Load Control Events with Event Notification. The Company will call Direct Load Control Events only during the Event Seasons. Direct Load Control Events will not be called on weekends or Holidays. Reasons for calling events may include, but are not limited to: energy load forecasted to be in the top 1% of annual load hours, forecasted temperature above 90 or below 32, expected high generation heat rates and market power prices, and/or forecasted low or transitioning wind generation. The Company will call no more than 150 event hours per Event Season.

SCHEDULE 25 (Concluded)

SPECIAL CONDITIONS (Continued)

7. PGE has the right to remove a Customer from the pilot when good cause is shown including, but not limited to, for poor customer responsiveness, consistent customer non-participation in called events, or issues with customer equipment that impact customer's participation.
8. PGE will administer a Non-Ducted HVAC System Thermostat Demonstration within the Smart Grid Test Bed for Nonresidential Customers who have a non-ducted, electric HVAC systems, which are compatible with the Flair Puck. Eligible Customers must:
 - a. be aligned with rates schedules defined in Applicable section;
 - b. be located within the Smart Grid Testbed boundary located on PGE's webpage regarding the "Smart Grid Testbed";
 - c. have the ability to connect Flair Puck to Internet at own expense;
 - d. and have a Networked Meter.
9. Non-Ducted Thermostat Demonstration events will follow the same requirements outlined in the Direct Control Load Event section, however;
 - a. Customers do not need meet the minimum number of hours to be eligible for an incentive;
 - b. Customers with ductless heat pumps (DHP) or package terminal heat pumps (PTHP) are eligible for both winter and summer seasons; \$20 per season;
 - c. Customers with electric heating or cooling only equipment are eligible for either the winter or summer season incentive; \$20 per season;
 - d. Customers participating in the demonstration may be eligible for Nonresidential DLC Pilot incentives.
10. The Non-Ducted Thermostat Demonstration will be capped at 100 units and is separate from the Schedule 25 cap of 3,800 thermostats.

TERM

This pilot term is December 1, 2017 through May 31, 2022.

(N)

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