

May 19, 2022

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

# RE: Supplemental Filing of Advice No. 22-07, Schedule 25, Nonresidential Direct Load Control Pilot Update and Extension

Portland General Electric Company (PGE) submits this supplemental 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. PGE initially filed Advice No. 22-07 on April 15, 2022, with a requested effective date of June 1, 2022, which remains as filed. PGE is submitting this Supplemental Filing due to an inadvertent omission in the tariff language related to Customer co-pays found by Staff, as well as provide some additional clarifying language and removing a program from the tariff that has now concluded.

Enclosed are the following replacement sheets.

Third Revision of Sheet No. 25-1 Fourth Revision of Sheet No. 25-3 Seventh Revision of Sheet No. 25-4

The other sheet remains as filed.

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 1514 for later ratemaking treatment.

A redline of Schedule 25 is attached as a courtesy.

Due to the requested effective date and the less than 30-day notice, PGE is also submitting an application requesting a waiver of legal statutory notice, pursuant to ORS 757.220 and OAR 860-022-0020.

Please direct questions to Casey Manley at (503) 464-8258. Please direct all formal correspondence and requests to the following email address <u>pge.opuc.filings@pgn.com</u>

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane Manager, Pricing and Tariffs

Enclosures cc Nick Sayen, OPUC

#### SCHEDULE 25 NONRESIDENTIAL DIRECT LOAD CONTROL PILOT

#### PURPOSE

This Direct Load Control Pilot is a demand response option for eligible nonresidential Customers. The Direct Load Control Pilot offers incentives to allow the Company to control thermostats during Direct Load Control Events while providing a customer override. The Company provides advance notice to participating Nonresidential Customers for Direct Load Control Events. The Pilot is expected to be conducted from December 1, 2017 through May 31,2025.

#### DEFINITIONS

<u>Central Air Conditioning</u> – Air conditioner tied into a central ducted forced air system.

<u>Direct Installation</u> – Thermostat delivery model in which a PGE technician, or implementation (N) contractor technician representing PGE, installs thermostat(s) at a qualifying customer Site at a reduced cost to the Customer and enables the thermostat(s) to participate in the Pilot. (N)

<u>Direct Load Control</u> – A remotely controllable switch that allows the utility to operate an appliance, often by cycling. In terms of this pilot, direct load control allows the Company to change the set point or cycle the Nonresidential Customer's heating or cooling through the Customer's Qualified Thermostat in order to reduce the Customer's energy demand.

<u>Direct Load Control Event</u> – A period of time in which the Company will provide direct load control.

<u>Ducted Heat Pump</u> – Heat pump heating and cooling system hooked into a central ducted forced air system.

<u>Electric Forced Air Heating</u> – An electrical resistance heating system tied into a central ducted forced air system.

<u>Event Notification</u> – The Company will issue a notification of a Direct Load Control Event to participating Customers. Participating Nonresidential Customers must choose at least one method for receipt of notification. Notification methods may include email, text, auto-dialer phone call, on thermostat display screen, or via mobile app notification. Notification may also be available on the Company's website.

<u>Event Season</u> – The pilot has two event seasons: the Summer Event Season and the Winter Event Season.

<u>Holidays</u> – The following are holidays for purposes of the pilot: New Year's Day (January 1), Martin Luther King Day (third Monday in January), President's Day (third Monday in February), Independence Day (July 4), Labor Day (first Monday in September), Thanksgiving Day (fourth Thursday in November), and Christmas Day (December 25). If a holiday falls on a Saturday, the preceding Friday will be designated the holiday. If a holiday falls on a Sunday, the following Monday will be designated the holiday. (C)

#### SCHEDULE 25 (Continued)

#### 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 the temperature setpoint 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.

#### ENROLLMENT

The Customer may enroll at any time but must participate for the minimum number of hours described in the incentive section.

#### INCENTIVE

Participating Customers receive a Qualified Thermostat for signing up for the Direct Load Control Pilot's Direct Installation channel. A Customer may receive multiple Qualified Thermostats for separate spaces subject to verification by the Company. A Customer co-pay of up to \$60 per installed thermostat is required for participation. Customers receive up to \$60 per Qualified Site for each Event Season they participate. A Customer participating in all Event Seasons receives up to \$120 per Qualified Site per Pilot year. Incentives are paid to the Customer with an automated clearing house (ACH,) check, bill credit, or generic gift card. To receive payment for an Event Season, all Qualifying Thermostats at the Qualified Site must participate in at least 50% of the event hours for which the Customer is eligible to participate in that Event Season. (C)

#### **SPECIAL CONDITIONS**

- Customers that reenroll in the program are not eligible for additional Qualified Thermostats (C) for signing up. A Customer continuing service at a new location is not considered a new enrollment.
- 2. If the participating Customer moves to a different location, the Customer may continue participation if the new location meets the eligibility requirements.
- 3. The Company will defer and seek recovery of all pilot costs not otherwise included in rates.
- 4. The Company is not responsible for any direct, consequential, incidental, punitive, exemplary, or indirect damages to the participating Customer or third parties that result from Air Conditioning Cycling or changing the thermostat set point.

#### SCHEDULE 25 (Concluded)

#### SPECIAL CONDITIONS (Continued)

- 5. The Company shall have the right to select the cycling schedule and the percentage of the Customer's heating or cooling systems to cycle at any one time, up to 100%, at its sole discretion.
- The Company shall have the right to pre-heat or pre-cool the Site as part of the Direct Load Control event in order to thermally condition the space to increase occupant comfort and site performance for the duration of the event.
   (N)
- 7. The provisions of this schedule do not apply for any period that the Company interrupts the Customer's load for a system emergency or any other time that a Customer's service is interrupted by events outside the control of the Company. The provisions of this schedule will not affect the calculation or rate of the regular service schedule and associated charges and Customers will not be charged for energy not used or demand not set during Direct (C) Load Control Events.
- The Company may engage with Customers who have existing qualified thermostats installed at their Sites to enroll them in the pilot. Customers with pre-existing thermostats that were not installed through the Direct Installation channel are eligible for seasonal incentives.
   (N)
- PGE has the right to remove a Customer from the pilot when good cause is shown including, (T) but not limited to, poor customer responsiveness, consistent customer non-participation in called events, or issues with customer equipment that impact customer's participation.

#### TERM

This pilot term is December 1, 2017 through May 31, 2025.	
	(C)

(D)

## PGE Supplemental Filing of Advice No. 22-07 Schedule 25, Nonresidential Direct Load Control Pilot Update and Extension

**Courtesy Redline** 

#### SCHEDULE 25 NONRESIDENTIAL DIRECT LOAD CONTROL PILOT

#### PURPOSE

This Direct Load Control Pilot is a demand response option for eligible nonresidential Customers. The Direct Load Control Pilot offers incentives to allow the Company to control thermostats during Direct Load Control Events while providing a customer override. The Company provides advance notice to participating Nonresidential Customers for Direct Load Control Events. The Pilot is expected to be conducted from December 1, 2017 through May 31, <u>20222025</u>.

#### DEFINITIONS

<u>Central Air Conditioning</u> – Air conditioner tied into a central ducted forced air system.

<u>Direct Installation – Thermostat delivery model in which a PGE technician, or implementation</u> <u>contractor technician representing PGE, installs thermostat(s) at a qualifying customer Site at a</u> <u>reduced cost to the Customer and enables the thermostat(s) to participate in the Pilot.</u>

<u>Direct Load Control</u> – A remotely controllable switch that allows the utility to operate an appliance, often by cycling. In terms of this pilot, direct load control allows the Company to change the set point or cycle the Nonresidential Customer's heating or cooling through the Customer's Qualified Thermostat in order to reduce the Customer's energy demand.

<u>Direct Load Control Event</u> – A period of time in which the Company will provide direct load control.

<u>Ducted Heat Pump</u> – Heat pump heating and cooling system hooked into a central ducted forced air system.

<u>Electric Forced Air Heating</u> – An electrical resistance heating system tied into a central ducted forced air system.

<u>Event Notification</u> – The Company will issue a notification of a Direct Load Control Event to participating Customers. Participating Nonresidential Customers must choose at least one method for receipt of notification. Notification methods may include email, text, auto-dialer phone call, on thermostat display screen, or via mobile app notification. Notification may also be available on the Company's website.

<u>Event Season</u> – The pilot has two event seasons: the Summer Event Season and the Winter Event Season.

<u>Holidays</u> – The following are holidays for purposes of the pilot: New Year's Day (January 1), Martin Luther King Day (third Monday in January), President's Day (third Monday in February), Independence Day (July 4), Labor Day (first Monday in September), Thanksgiving Day (fourth Thursday in November), and Christmas Day (December 25). If a holiday falls on a Saturday, the preceding Friday will be designated the holiday. If a holiday falls on a Sunday, the following Monday will be designated the holiday.

#### SCHEDULE 25 (Continued)

DEFINITIONS (Continued)

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

<u>Summer Event Season</u> – Includes the successive calendar months June through September.

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

Qualified Site – Nonresidential Customer building served under qualifying PGE rate Schedule (as defined in Applicable section below) with a unique PGE service address and utility meter. Additionally, Qualified Sites meet HVAC system requirements defined in Eligibility section below.

<u>Qualified Thermostat</u> – 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 <u>7,000</u>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.

#### SCHEDULE 25 (Continued)

#### 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 the temperature setpoint 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.

#### ENROLLMENT

The Customer may enroll at any time but must participate for the minimum number of hours described in the incentive section.

#### INCENTIVE

Participating Customers receive a Qualified Thermostat for signing up for the Direct Load Control Pilot's Direct Installation channel. A Customer may receive multiple Qualified Thermostats for separate spaces subject to verification by the Company. <u>A Customer co-pay of up to \$60 per installed thermostat is required for participation</u>. In addition, Customers receive up to \$60 per Qualified Thermostat Site for each Event Season they participate. A Customer participating in all Event Seasons receives up to \$120 per Qualified <u>Site Thermostat</u> per Pilot year. Incentives are paid to the Customer with an automated clearing house (ACH,) check, bill credit, or generic gift card. To receive payment for an Event Season, <u>all Qualifying Thermostats at</u> the <u>Qualified Site Customer</u> must participate in at least 50% of the event hours for which the Customer is eligible to participate in that Event Season.

#### SPECIAL CONDITIONS

- 1. Customers that reenroll in the program are not eligible for <u>additional</u>a second Qualified Thermostats for signing up. A Customer continuing service at a new location is not considered a new enrollment.
- 2. If the participating Customer moves to a different location, the Customer may continue participation if the new location meets the eligibility requirements.
- 3. The Company will defer and seek recovery of all pilot costs not otherwise included in rates.
- 4. The Company is not responsible for any direct, consequential, incidental, punitive, exemplary, or indirect damages to the participating Customer or third parties that result from Air Conditioning Cycling or changing the thermostat set point.

#### SCHEDULE 25 (Concluded)

#### SPECIAL CONDITIONS (Continued)

- 5. The Company shall have the right to select the cycling schedule and the percentage of the Customer's heating or cooling systems to cycle at any one time, up to 100%, at its sole discretion.
- 6. The Company shall have the right to pre-heat or pre-cool the Site as part of the Direct Load Control event in order to thermally condition the space to increase occupant comfort and site performance for the duration of the event.
- 7. The provisions of this schedule do not apply for any period that the Company interrupts the Customer's load for a system emergency or any other time that a Customer's service is interrupted by events outside the control of the Company. The provisions of this schedule will not affect the calculation or rate of the regular service schedule and associated charges and Customers will not be charged for energy not used or demand not set during Direct Load Control Events.
- 6.8. The Company may engage with Customers who have existing qualified thermostats installed at their Sites to enroll them in the pilot. Customers with pre-existing thermostats that were not installed through the Direct Installation channel are eligible for seasonal incentives.
- 7.9. 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.

Advice No. 22-07 Issued May 19, 2022 Brett Sims, Vice President

Effective for service on and after June 1, 2022

### LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at <u>puc.filingcenter@state.or.us</u>.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON				
IN THE MATTER OF THE APPLICATION OF	)	UTILITY L.S.N. APPLICATION		
	)	NO		
(UTILITY COMPANY)	)	(LEAVE BLANK)		
TO WAIVE STATUTORY NOTICE.	)			
NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.				
<ol> <li>GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)</li> <li>Portland General Electric Company (PGE) submits this supplemental 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. PGE initially filed Advice No. 22-07 on April 15, 2022, with a requested effective date of June 1, 2022, which remains as filed. PGE is submitting this Supplemental Filing due to an inadvertent omission in the tariff language related to Customer co-pays found by Staff, as well as provide some additional clarifying language and removing a program from the tariff that has now concluded.</li> </ol>				
2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW REFERENCE BY NUMBER, PAGE, AND ITEM) Second Revision of Sheet No. 25-1 Fourth Revision of Sheet No. 25-2	/ ON	I FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE		

Third Revision of Sheet No. 25-3 Sixth Revision of Sheet No. 25-4

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM) Third Revision of Sheet No. 25-1 Fifth Revision of Sheet No. 25-2 Fourth Revision of Sheet No. 25-3 Seventh Revision of Sheet No. 25-4

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

PGE initially filed Advice No. 22-07 on April 15, 2022, with a requested effective date of June 1, 2022, which remains as filed. PGE is submitting this Supplemental Filing due to an inadvertent omission in the tariff language related to Customer co-pays found by Staff, as well as provide some additional clarifying language and removing a program from the tariff that has now concluded.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): June 1, 2022

. AUTHORIZED SIGNATURE		TITLE \s\ Robert Macfarlane Manager, Pricing & Tariffs	DATE May 19, 2022		
PUC USE ONLY					
		EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE			
AUTHORIZED SIGNATURE			DATE		