

November 21, 2018

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. 18-13, Schedule 110 Energy Efficiency Customer Service

Portland General Electric Company (PGE) submits this supplemental filing pursuant to Oregon Revised Statutes (ORS) 757.205 and 757.210 and Oregon Administrative Rule (OAR) 860-022-0025 for filing proposed tariff sheet associated with Tariff P.U.C. No. 18. PGE initially filed Advice No. 18-13 on October 17, 2018 with a requested effective date of January 1, 2019, which remains as originally filed. The purpose of this supplemental filing is to change the language in Schedule 110 to increase the allowed expenses for this schedule from \$1 million to \$1.3.

Enclosed is the following additional sheet:

Third Revision of Sheet No. 110-1

The other sheet remains as previously filed.

To satisfy the requirements of OAR 860-022-0025, PGE provides the following response:

The proposed revision to Schedule 110, Energy Efficiency Customer Service, in this supplemental filing does not change the prices to the previously filed tariff sheets. The purpose for requesting this increase is due to the Energy Trust of Oregon (ETO) identifying small industrial as a new target segment to pursue under Schedule 110. The addition of the small industrial market segment requires PGE to hire an additional FTE. Due to this increase in scope and additional FTE, PGE is forecasting to exceed the \$1 million expense cap as currently stated in Schedule 110.

Also included with this filing is an attachment and work papers. The attachment provides a supporting letter from the ETO which outlines the need for the additional FTE and associated expense. The work papers provide the program budget and FTE detail.

Please direct any questions regarding this filing to Andrew Speer at (503) 464-7486.

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

Sincerely,

Karla Wenzel

Manager, Pricing and Tariffs

Kenlo Jueral

Enclosure(s)

SCHEDULE 110 ENERGY EFFICIENCY CUSTOMER SERVICE

PURPOSE

To fund Company activities associated with enabling Customers to achieve energy efficiency including, but not limited to project facilitation, technical assistance, education and assistance to support programs administered by the Energy Trust of Oregon (ETO).

AVAILABLE

In all territory served by the Company.

APPLICABLE

To all Residential and Nonresidential Customers located within the Company's service territory except those Nonresidential Customers whose load exceeded one aMW at a Point of Delivery during the prior calendar year or those Nonresidential Customers qualifying as a Self-Directing Customer (SDC). Customers so exempted will not be charged the prices contained in this Schedule.

DEFINITIONS

For the purposes of this tariff, the following definition will apply:

Energy Efficiency Measures (EEMs) – Actions that enable customers to reduce energy use. EEMs can be behavioral or equipment-related.

SELF-DIRECTING CUSTOMER (SDC)

Pursuant to OAR 860-038-0480, to qualify to be a SDC, the Large Nonresidential Customer must have a load that exceeds one aMW at a Site as defined in Rule B and receive certification from the ODOE as a SDC.

BALANCING ACCOUNT

Effective June 1, 2010, the Company will establish a balancing account to record the differences between the actual fully loaded qualifying expenses (which may not exceed \$1.3 million in any year) and the revenues collected under this schedule adjusted for allowance for uncollectibles, franchise fees, and other revenue sensitive costs. This balancing account will accrue interest at the Commission-authorized rate for deferred accounts.

(C)

PGE Supplemental Filing of Advice No. 18-13 Attachment

Mr. Jay Tinker Director of Rates and Regulatory Affairs Portland General Electric

Dear Mr. Tinker,

Portland General Electric retains annually certain budgeted costs associated with meeting SB 838 targets. These funds help promote energy efficiency as a priority resource for customers. As a utility, Portland General Electric (PGE) has multiple interactions with customers on a wide variety of topics. These funds are designed to specifically promote Energy Trust programs as an energy solution available to them. Besides being best practice for customer service, these outreach efforts also help customers, and the trade allies that serve them, learn about how PGE and Energy Trust are working together to provide them with energy efficiency solutions.

PGE's 838 energy efficiency budgets have funded an outreach team of energy specialists and marketing support to reach the more than 20,000 business customers of the utility. For residential customers, PGE works with heating contractors to improve installations of efficient heat pump equipment. For business customers, the outreach team works in the field to provide no-cost energy efficiency consultations with smaller businesses to generate warm leads to trade allies and Energy Trust program representatives. Each year, this small business outreach team generate hundreds of leads that are helping us serve these traditionally harder-to-reach customers.

PGE proposes to increase the amount of these energy efficiency funds by about \$250,000 per year to expand their activities to also help Energy Trust with outreach and recruitment for small industrial customers. As with other coordinated efforts with PGE's budgeted funds, PGE would report on the outcomes to the OPUC.

Energy Trust supports this proposal for additional utility support and effort. Program participation for small industrial customers has lagged participation for larger customers, and we need to do more to reach these customers with our programs. We know from our combined experience that it takes multiple touchpoints by more than one agent to get these challenging customers to act. Energy Trust is committed to working with PGE to develop a streamlined, effective system to coordinate the outreach efforts of our respective organizations.

Let me know what other assistance you may need in this.

Sincerely,

Michael Colgrove Executive Director

CC, Anna Kim, Oregon Public Utilities Commission JP Batmale, Oregon Public Utilities Commission