



Oregon

Kate Brown, Governor

Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

Mailing Address: PO Box 1088

Salem, OR 97308-1088

503-373-7394

June 2, 2020



BY EMAIL

Portland General Electric Company

pge.opuc.filings@pgn.com

RE: Advice No. 20-10

At the public meeting on June 2, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1114. The Staff Report and a receipted copy of the sheet in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 2, 2020

REGULAR CONSENT EFFECTIVE DATE June 3, 2020

DATE: May 26, 2020

TO: Public Utility Commission

FROM: Anna Kim

THROUGH: Bryan Conway, Michael Dougherty, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1114/ Advice No. 20-10)
Requests Update to Schedule 7 Tariff Relating to Peak Time Rebate
Event.

STAFF RECOMMENDATION:

Authorize Portland General Electric (PGE or the Company) to update its Residential Schedule 7 to increase the participation cap for its Optional Peak Time Rebate Program.

DISCUSSION:

Issue

Whether the Commission should allow PGE to update its Residential Schedule 7 to increase the Peak Time Rebate participation cap from 110,000 to 160,000 participants.

Applicable Law

ORS 757.210 requires fair, just, and reasonable rates. OAR 860-022-0025(2) and -0030(1) require a utility proposing a rate change to provide certain information such as the amount of any rate change, number of customers affected, and reason for rate change.

Analysis

PGE's Peak Time Rebate (PTR) is a demand response pilot open to residential customers. Participants receive incentives for reducing energy usage during certain

periods of time during events called on by the Company. This pilot went into effect on April 10, 2019, when the Company's changes to Schedule 7 went into effect.

On April 27, 2020, PGE filed its Advice No. 20-10, Schedule 7, Peak Time Rebate Event Participation. The Company requests approval to change the participation cap from 110,000 participants to 160,000 participants. The Company states that its initial projections were for 55,000 participants to have enrolled by the end of 2019, but it had signed up 80,000 participants by that time. The Company further believes that additional enrollments may be necessary to meet MW targets established in its integrated resource plan (IRP). The Company proposes to increase the cap to accommodate greater-than-anticipated demand and to achieve its IRP targets, allowing more freedom to target recruiting and test additional refinements to the pilot in 2020.

Staff believes this request and supporting information indicates that this pilot is a successful offering that could soon be ready for transition to a permanent program. The Company indicates in its filing that there was no evidence of "gaming",¹ which suggests that PGE has effectively structured the pilot to provide reasonable compensation, while at the same time, increased participation rates indicate that this is an attractive option for residential ratepayers.

In this filing, the Company states that it intends to request removing the participation cap in the future.² In email correspondence on May 20, 2020, the Company indicated that there are 613,700 customers on Schedule 7 that could be eligible for the program. A cap of 160,000 participants would cover a little over a quarter of all eligible participants. If this offering continues to be successful, Staff would also like to see this participation cap removed and this offering made permanently available to all eligible customers.

Staff applauds PGE's success in testing this demand response offering and would like to continue to work with the Company to develop PTR towards a permanent program. To that end, Staff requests that when the Company files its next request to reauthorize deferral accounting for this pilot, that with that request, it also files a plan for transitioning PTR into a program. The Company has agreed to do so.

Staff believes that this conversation will be well-timed. The authorization for deferral accounting expires on June 22, 2020.³ The Company also plans to publish evaluations results for PTR in June 2020. While Staff understands that the Company intends to test further refinements to PTR during summer 2020, starting to discuss the transition in

¹ PGE Advice No. 20-10 pg. 1.

² Ibid, pg. 2.

³ Order No. 19-313.

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June will allow time to agree upon a plan that is flexible and can adapt based on summer results.

Conclusion

Based on the Company's success with the PTR pilot, Staff recommends that the Commission authorize PGE to update its Residential Schedule 7 to increase the participation cap for its Optional Peak Time Rebate Program.

PROPOSED COMMISSION MOTION:

Authorize PGE to update its Residential Schedule 7 to increase the participation cap for its Optional Peak Time Rebate Program.

ADV 1114 PTR

SCHEDULE 7 (Continued)

ENERGY PRICE PLANS: DEFAULT PLAN (Continued)

Peak Time Rebate Event Participation

Residential Customers on the default plan can also enroll and participate in PTR events. This option is available for enrollment to the first 160,000 Residential Customers. Customer enrollment will close once the program has 160,000 Residential Customers.

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Monthly Rate

Customers on the default plan plus PTR will pay the default plan monthly rate – which includes Basic Charge, transmission and related services, and distribution charges. Energy Charges may also include the following PTR credit:

PTR Credit	100.00	¢ per kWh
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To receive the PTR Credit, the Customer must reduce Energy use during a PTR Event. Such event will be a two- to five-consecutive-hour window between the hours of 7:00 AM to 11:00 AM or 3:00 PM to 8:00 PM. Events will not be called on holidays. Holidays are New Year's Day on January 1; Memorial Day, the last Monday in May; Independence Day on July 4; Labor Day, the first Monday in September; Thanksgiving Day, the fourth Thursday in November; and Christmas Day on 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.

The PTR program has two event seasons: summer (the successive calendar months of June through September) and winter (successive calendar months of November through February). The Company will call PTR events only in event seasons. Prior to each season, the Company will remind the enrolled Customers that they are on the program, that they may participate in PTR events, and ways to be successful.

The Company initiates PTR events with an event notification to participating Customers the day prior to the PTR event. Participating Customers must choose at least one method for receipt of notification: email, text, or another available option. The Company will not call PTR events for more than two consecutive days. 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.

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Advice No. 20-10
Issued April 27, 2020
James F. Lobdell, Senior Vice President

Effective for service
on and after June 3, 2020