



Oregon

Kate Brown, Governor

Public Utility Commission

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November 15, 2022



BY EMAIL

Portland General Electric Company

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RE: Advice No. 22-22

At the public meeting on November 15, 2022, the Commission adopted Staff's recommendation in this matter docketed as ADV 1433. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

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**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: November 15, 2022**

REGULAR **CONSENT** **EFFECTIVE DATE** November 16, 2022

DATE: November 7, 2022

TO: Public Utility Commission

FROM: Eric Shierman

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

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. ADV 1433/Advice No. 22-22)
Schedule 8 and 52 residential and nonresidential EV charging update.

STAFF RECOMMENDATION:

Approve Portland General Electric's Advice No. 22-22.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should approve Portland General Electric (PGE or the Company) Advice No. 22-22, which revises Schedule 8 to include a rebate for home panel upgrades for electric vehicle (EV) charging, and Schedule 52 to add rebates for EV make-ready construction costs.

Applicable Rule or Law

Under ORS 757.205(1):

Every public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules which shall be open to public inspection, showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, or for any service in connection therewith or performed by any public utility controlled or operated by it.

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable. ORS 757.210. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing; the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

ORS 757.357 requires the Commission to direct each electric company to file programs that accelerate transportation electrification (TE). The statute gives considerations that the Commission is required to include in its review of such programs. House Bill (HB) 2165 went into effect on January 1, 2022, and amends ORS 757.357 in significant ways. HB 2165 directed utilities to implement a monthly meter charge equal to 0.25 percent of total revenues as a dedicated funding source for TE investments.

HB 2165 includes further detail and requirements for expenditures and tracking of the monthly meter charge. Utilities are required by law to account and report the revenues and expenditures in a manner prescribed by the Commission. The expenditures the utilities make must be made on elements in the utility's Commission-accepted TE Plan. Additionally, utilities must make "reasonable efforts" to spend at least 50 percent of that funding on activities to support TE in "underserved communities."

Analysis

Background

On July 29, 2022, PGE filed a proposed 2022 Monthly Meter Charge Budget.¹ PGE then filed on October 3, 2022, infrastructure measure applications for enhancements to the Company's residential and nonresidential EV pilots. On the same day, PGE filed new tariff sheets for Schedules 8 and 52 to reflect these pilot upgrades. On October 18, 2022, the Commission approved PGE's 2022 Monthly Meter Charge Budget, approving the upgrades—a new rebate for panel upgrades for Schedule 8 and enhanced rebates for nonresidential charging for Schedule 52.²

Upgrades to Schedule 8

The Commission approved PGE's plan to expand the Residential EV Smart Charging Pilot under Schedule 8. This will include offering a standard \$1,000 rebate and \$5,000 income qualified rebate for panel upgrades.

¹ See Docket No. UM 2033, PGE, Proposed Monthly Meter Charge Budget for 2022 and Municipal Charging Collaboration Pilot Proposal, July 29, 2022.

² See Docket No. UM 2033, OPUC, Order No. 22-381, October 20, 2022, p 1.

Staff notes the panel upgrade costs that ratepayers subsidize should be net of federal subsidies. The recently passed Inflation Reduction Act expanded the Energy Efficient Home Improvement Credit from a lifetime cap of \$500 to an annual cap of \$1,200. The new law makes panel upgrades for EV charging infrastructure a qualified improvement that can receive up to \$600 in credit.³ The wording of these tariffs does not require PGE rebate the portion of a customer's panel upgrade project that is funded by federal subsidy.

Upgrades to Schedule 52

The Commission approved PGE's plan to expand the Business EV Charging Rebates under Schedule 52. PGE will offer rebates of 80 percent of make-ready costs up to a maximum of \$6,000 per Level 2 (L2) port and \$36,000 per site. The Company will also offer higher rebates for direct current fast charging (DCFC) of \$350 per kW, up to \$25,000 per DCFC port (e.g., a \$10,500 rebate for a 30 kW DCFC and a \$17,500 rebate for a 50 kW DCFC). DCFC sites would not be eligible for make-ready rebates unless the customer paired DCFC with L2 chargers.

New Planning Process

These tariff filings fall within the context of a new framework for electric company TE investments. In UM 2165, Staff investigated a new TE investment framework. During that time, the Governor signed HB 2165 into law, which affected the scope of Staff's ultimate recommendation at the December 14, 2021, Public Meeting which the Commission adopted in Order No. 21-484. On September 8, 2022, the Commission approved new administrative rules for Division 87 that implemented the TE investment framework into formal rules and implementation-level guidance. A central tenant of that framework is for the Commission to make approval decisions at the portfolio level rather than on a tariff-by-tariff basis.

Staff's standard of reviewing TE tariffs has changed accordingly. Previously, the Commission has approved TE activities by electric companies, associated budget expenditures, and associated tariff changes separately through consideration of advice filings. Now the Commission is moving to a process where the programmatic changes and budget approval occur at a portfolio level in a TE planning docket rather than separate approvals in advice dockets.

In this case, the Commission has already approved the programmatic changes and associated budget for these changes to Schedules 8 and 52. In reviewing these tariffs, the new scope of Staff's review is to confirm that the tariff sheet language is congruent with the electric company's prior filing.

³ Mengle, Rockey, *Save More on Green Home Improvements Under the Inflation Reduction Act* Kiplinger's, September 16, 2022.

Staff has reviewed the proposed tariff sheets PGE filed in Advice No. 22-22. The updates of these tariffs fall within the changes to the infrastructure measures that the Commission has approved.

The Commission's next portfolio-level decision on PGE's TE expenditures will be for the entire TE Portfolio for calendar years 2023-2025. That will include all TE expenditures, including the Monthly Meter Charge.

Conclusion

Staff recommends the Commission approve PGE's updates to Schedules 8 and 52. These tariff changes reflect the changes the Commission approved in UM 2033 when the Commission approved PGE's 2022 Monthly Meter Charge Budget.

PROPOSED COMMISSION MOTION:

Approve Portland General Electric's Advice No. 22-22.

SCHEDULE 8 (Continued)

DEFINITIONS (Continued)

Income-Eligible Customer – A verified Residential Customer at 120% or below the state median income as defined by the US Department of Housing Urban Development, or the home qualifies for Section 8 housing. (C)

Managed Charging Event – A period during which the utility will provide Direct Load Control by sending communication signals to a customer’s vehicle or EVSE to adjust the rate or time of charge.

Participation Year – Twelve consecutive months from the anniversary date of a Qualifying Customer’s enrollment in the Smart Charging Program.

Qualifying Customer – A Residential Customer in an existing single-family residence, including separately metered residences with assigned parking, with a Qualified L2 EVSE (excludes new construction or multifamily property).

Qualified Level 2 Electric Vehicle Supply Equipment (L2 EVSE) – A pre-approved L2 EVSE that meets the program’s connectivity and controllability criteria.

Vehicle Telematics - Device installed in a vehicle that allows the sending, receiving, and storing of telemetry data.

ELIGIBILITY

Eligible Customers must comply with the terms of the participation agreement and be a Qualifying Customer with either of the following. (C)

A. Qualified L2 EVSE and agree to the following minimum participation requirements:

- (1) the Qualified L2 EVSE is successfully connected to the Smart Charging Program for at least 50% of the participation year,
- (2) the Qualified L2 EVSE participates in six Managed Charging Events, and
- (3) the Qualified L2 EVSE completes 25 Active Charging Sessions.

Or

B. EV with Vehicle Telematics connected to an approved vehicle telematics provider and agreement to the following minimum participation requirements: (C)

- (1) the connected EV participates in six Managed Charging Events, (C)
- (2) the connected EV completes 25 Active Charging Sessions, and (T)
- (3) the vehicle telematics provider’s participation agreement. (C)

ENROLLMENT

Qualifying Customers can enroll in the Pilot at PortlandGeneral.com through July 31, 2024. Unless PGE terminates this Pilot, customers will remain enrolled in the Smart Charging Program for the entire Pilot term. Qualifying Customers that reenroll in the Pilot are not eligible for a second payment for installation of a single Qualified L2 EVSE. A Qualifying Customer continuing service at a new residence is not considered a new enrollment.

SCHEDULE 8 (Continued)

(T)

INCENTIVES (Continued)

(N)

Standard Panel Upgrade Rebate	A one-time incentive to aid in the materials and electrical work necessary to upgrade participating customers' home electrical panels to 200A service in order to install a Qualified Level 2 EVSE. Customers must also be applying for a Standard EVSE Installation Rebate. Qualifying Customers will receive the rebate by check or bill credit from the Company upon approval of rebate qualification. This incentive is available until the designated Panel Upgrade Rebate funding is exhausted.	Up to \$1,000; capped at price paid.
Income-Eligible Panel Upgrade Rebate	A one-time incentive to aid in the materials and electrical work necessary to upgrade participating customers' home electrical panels to 200A service in order to install a Qualified Level 2 EVSE. Customers must also be applying for an Income-Eligible EVSE Installation Rebate. Qualifying Income-Eligible Customers will receive the rebate by check or bill credit from the Company upon approval of rebate qualification. This incentive is available until the designated Panel Upgrade Rebate funding is exhausted.	Up to \$5,000; capped at price paid.

(N)

MANAGED CHARGING EVENTS

Customers will be randomly assigned into one of three groups: A, B, or C. Group A will be the control group and will have no demand response tactics scheduled. Group B will participate in load shifting events where charging times will be shifted away from system peak periods. Group C will have their charging slowed or stopped during event periods. The Company will strive to maintain the equal number of participants and EVSE models in each group. Managed Charged Events may be called at any hour and any weekday excluding Holidays. During Managed Charging Events, the Customer will allow the Company to control their Qualified L2 EVSE or connected EV for the duration of the event. The Customer has the option not to participate by overriding via the manufacturer's mobile application.

SCHEDULE 8 (Concluded)

SPECIAL CONDITIONS

1. If a Qualifying Customer moves to a different residence, the customer may continue participation in the Smart Charing Program at the new residence if the Customer meets the eligibility requirements.
2. The Company will defer and seek recovery of all Pilot costs not otherwise included in rates.
3. The provisions of this schedule do not apply for any period that the Company interrupts the Qualifying Customer's load for a system emergency or any other time that a Qualifying 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 associated with the Qualifying Customer's Schedule 7 charges and associated charges.

TERM

This pilot began October 23, 2020 and expires December 31, 2024.

(M)

(M)

**SCHEDULE 52
NONRESIDENTIAL ELECTRIC VEHICLE CHARGING REBATE PILOT**

PURPOSE

This Nonresidential Electric Vehicle (EV) Charging Rebate Pilot provides eligible Customers a rebate towards the purchase and installation of EV charging infrastructure. The overarching goals of the pilot are to:

- Accelerate EV adoption by ensuring adequate charging infrastructure is available to meet customers' charging needs;
- Reduce the cost and complexity of installing EV Supply Equipment that can preclude Customers from deploying charging infrastructure; and
- Create a network of demand-side resources to reduce the costs of serving EV loads by supporting efficient grid operations and future renewables integration.

AVAILABLE

In all territory served by the Company.

APPLICABLE

This pilot is applicable to Nonresidential Customers and property managers/owners of multifamily residence(s) until the cap approved in OPUC Order No. 19-385 and the authorized HB 2165 Monthly Meter Charge budget have been reached. Temporary customers such as construction sites which have not received their certificate of occupancy are excluded.

(C)
(C)

DEFINITIONS

DCFC EVSE – An EVSE that transfers direct current to the EV.

(N)

Electric Vehicle Supply Equipment (EVSE) – The device, including the cable(s), coupler(s), and embedded software, installed for the purpose of transferring electricity between the electrical infrastructure and the EV.

(C)

Level 2 (L2) EVSE – An EVSE that transfers alternating current to the EV at 208 or 240 volts.

(N)
(D)

Operational – An EVSE installed on the premises that is able to transfer energy between the premises wiring and the EV, with all the applicable payment methods (e.g., credit card, phone app, subscription card), and transmit operational data (e.g., energy usage, session start/end times) to the EVSP.

Port – The cable and coupler used to transfer energy from the EVSE to the EV. The number of Ports is defined by the number of EVs that can be charged simultaneously by a given EVSE. There are commonly one or two Ports per EVSE.

SCHEDULE 52 (Continued)

DEFINITIONS (Continued)

Qualified EVSE –The list of qualified EVSE(s) that are available for rebate is determined by the Company and listed on PortlandGeneral.com.

ELIGIBILITY

Eligible Customers must own, lease, or demonstrate control over the site where the EVSE(s) are installed. The Customer will be responsible for procuring the EVSE(s).

ENROLLMENT

The customer enrollment period will be open until funds have been allocated. Eligible Customers may enroll at PortlandGeneral.com.

REBATES

Rebate	Description	Amount
Standard L2 EVSE Rebate	A one-time rebate for the purchase of a Qualified L2 EVSE.	Up to \$1,000 per Port; capped at price paid. Customers are eligible for up to \$50,000 in Standard L2 EVSE Rebates per site.
Multifamily L2 EVSE Rebate	A one-time rebate for the purchase of a Qualified L2 EVSE installed at a multifamily dwelling.	Up to \$2,300 per Port; capped at price paid. Customers are eligible for up to \$50,000 in Multifamily L2 EVSE Rebates per site.
L2 Installation Rebate	A one-time rebate for installing a L2 EVSE. Eligible covered costs include the cost of installing electrical infrastructure to support the EVSE, including but not limited to trenching, conduit, switchgear, equipment pads, line extension costs, site restoration, and EVSE installation.	Up to 80% of eligible costs paid or \$6,000 per Port, whichever is less. Customers are eligible for up to six L2 Installation Rebates per site.
DCFC EVSE Rebate	A one-time rebate for the purchase and installation of a Qualified DCFC EVSE.	Up to \$350 per kW of maximum power output for the EVSE, up to a maximum of \$25,000 per Port.

(T)

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SCHEDULE 52 (Concluded)

REBATES Continued)

Rebates are available for reservation on a first come-first serve basis per the reservation process identified on PortlandGeneral.com. Eligible Customers must comply with the application instructions and agree to the pilot Terms and Conditions on PortlandGeneral.com to receive the rebate.

Participating Customers will receive the one-time payment by check no later than 90 days from the Company receiving a complete application. All EVSE(s) installed under the pilot are subject to verification by PGE.

Participating Customers must meet the pilot requirements for 10 years. In the event the Participating Customer does not meet this commitment, the Participating Customer commits to reimburse PGE the pro-rata value of the rebate, calculated over the 10-year term.

SPECIAL CONDITIONS

1. Participation in this pilot is not mandatory to install EV charging equipment.
2. The Customer's charges for Electricity Service under any of the Company's Standard Service or Direct Access Service schedules are not changed or affected in any way by service under this schedule and are due and payable as specified in those schedules.
3. The Company will defer and seek recovery of all pilot costs not otherwise included in rates.
4. Participating Customers will maintain the EVSE(s) on a Standard Service Schedule. Customers on Direct Access Service must have the participating chargers separately metered and on a Standard Service Schedule.
5. Participating Customers will ensure the EVSE(s) are Qualified and Operational. If a property with EVSE(s) installed under the pilot changes ownership, leaseholdship or management, participation in the pilot can be assumed by a new owner, lessee or manager that is willing to meet the pilot requirements.
6. Participating Customers will authorize the EVSP to provide operational data (e.g. energy usage, time of day usage and number of unique drivers) to PGE. Participating Customers agree to allow Company and its agents and representatives to use data gathered as part of the pilot in regulatory reporting, ordinary business use, industry forums, case studies or other similar activities, in accordance with applicable laws and regulations and to participate in Company-led research such as surveys.
7. Participating Customers may terminate participation in the pilot after providing PGE no less than 30 days' notice and are subject to the noncompliance reimbursement referenced in this Tariff. At the end of the 10-year term, Participating Customers have the option to continue to participate in the pilot if it is still active, but there is no obligation to do so.

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