

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

December 28, 2023



BY EMAIL
Portland General Electric Company
pge.opuc.filings@pgn.com

RE: Advice No. 23-21

At the public meeting on December 28, 2023, the Commission adopted Staff's recommendation in this matter docketed as ADV 1549. 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

(503) 378-3098

PUBLIC UTILITY COMMISSION OF OREGON STAFF REPORT PUBLIC MEETING DATE: December 28, 2023

REGULAR ____ CONSENT X EFFECTIVE DATE ___ January 1, 2024

DATE: December 18, 2023

TO: Public Utility Commission

FROM: Ted Drennan

THROUGH: Caroline Moore and Scott Gibbens SIGNED

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:

(Docket No. ADV 1549)

PGE Advice No. 23-21, Schedule 138 Energy Storage Cost Recovery

Mechanism Update.

STAFF RECOMMENDATION:

Staff recommends the Public Utility Commission of Oregon (Commission) approve the request by Portland General Electric (PGE or Company) to update Schedule 138 prices to recover costs associated with House Bill (HB) 2193. Staff also recommends the Commission direct the Company to hold a workshop to discuss storage pilot projects at one of their Learning Labs meetings in 2024.

DISCUSSION:

Issue

Whether the Commission should approve PGE's proposal to revise its Schedule 138.

Applicable Rule or Law

PGE's filing is made under ORS 757.205, ORS 757.210, and OAR 860-022-0025.

- ORS 757.205 requires that public utilities file all rates, tolls, and charges with the Commission.
- ORS 757.210 requires that public utilities demonstrate that changes to automatic adjustment clauses are fair, just, and reasonable.

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 OAR 860-022-0025 requires that new tariff filings include statements showing the new rates, the number of customers affected, the impact on annual revenue, and the reasons supporting the proposed tariff.

Analysis

PGE is seeking to adjust the rates associated with recovery of two HB 2193 energy storage pilot projects. The costs are associated with projects under the following dockets:

- UM 2078 Residential Battery Storage
- UM 2113 Non-Residential Energy Storage Pilots

PGE's filing reduces the Schedule 138 collection rate to zero percent in 2024 due to a projected balance of \$0.3 million at the end of 2023 from lower than anticipated participation in the pilot during the pandemic. Staff reviewed the filing and associated workpapers and believe everything is accurate and correct. Given the current positive balance, the amortization and recovery of these expenses is projected to result in a decrease of approximately 0.1 percent for applicable Cost-of-Service customers. This is a \$0.12 monthly reduction for a typical Schedule 7 residential customer.

Staff would also like the Company to engage with stakeholders on the storage pilots in the coming year. Staff would like the Company to provide an update on its residential Smart Battery Pilot, specifically on the results of changes implemented in May 2023. Staff would also like the Company to provide an update on the future role and necessity of the non-residential pilots, given the Company's storage procurement in 2023. Preferably this engagement could occur at one of PGE's Learning Lab meetings in June or July 2024. Staff contacted the Company, and they have agreed that this is a reasonable request and are willing to hold a workshop to address the issues.

Conclusion

Based on the review of PGE's application, Staff concludes that the proposed revisions are consistent with the intent of Schedule 138 and result in rates that are fair, just, and reasonable.

¹ Docket No. ADV 1470, https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23555.

² Staff understands the Seaside storage project is approximately 200 MW, will be located in Portland and enter service in mid-2025. The Evergreen storage project is approximately 75 MW, will be located in Hillsboro and enter service in 2024, and a third storage project of approximately 200 MW, will be located in Troutdale and enter service in 2024.

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PROPOSED COMMISSION MOTION:

Approve PGE's ADV 1549, Schedule 138 Energy Storage Cost Recovery Mechanism Update, effective for service rendered on and after January 1, 2024, and direct the Company to engage with Staff and stakeholders on energy storage pilot projects at a Learning Lab meeting in 2024.

PGE ADV 1549

SCHEDULE 138 ENERGY STORAGE COST RECOVERY MECHANISM

PURPOSE

This Schedule recovers the expenses associated with HB 2193 energy storage pilots not otherwise included in rates. This adjustment schedule is implemented as an automatic adjustment clause as provided for under ORS 757.210.

AVAILABLE

In all territory served by the Company.

APPLICABLE

To all bills for Electricity Service except Schedules 76R, 485, 489, 490, 491, 492, 495 and 576R and 689.

ADJUSTMENT RATE

The Adjustment Rate, applicable for service on and after the effective date of this schedule are:

<u>Schedule</u>	Adjustment Rate		(D)
7	0.000	¢ per kWh	(R)
15/515	0.000	¢ per kWh	
32/532	0.000	¢ per kWh	
38/538	0.000	¢ per kWh	
47	0.000	¢ per kWh	
49/549	0.000	¢ per kWh	
75/575			
Secondary	0.000	¢ per kWh	
Primary	0.000	¢ per kWh	
Subtransmission	0.000	¢ per kWh	
83/583	0.000	¢ per kWh	
85/585			
Secondary	0.000	¢ per kWh	1
Primary	0.000	¢ per kWh	(R)

SCHEDULE 138 (Concluded)

ADJUSTMENT RATE (Continued)

Schedule 89/589	Adjustment Rate	
Secondary	0.000 ¢ per kWh	(R)
Primary	0.000 ¢ per kWh	
Subtransmission	0.000 ¢ per kWh	
90/590		
Primary 30-250 Mwa	0.000 ¢ per kWh	(C)
Primary >250 Mwa	0.000 ¢ per kWh	(C)
Subtransmission	0.000 ¢ per kWh	(3)
91/591	0.000 ¢ per kWh	
92/592	0.000 ¢ per kWh	
95/595	0.000 ¢ per kWh	(R)

BALANCING ACCOUNT

The Company will maintain a balancing account to accrue differences between the incremental costs associated with energy storage pilots and the revenues collected under this schedule. This balancing account will accrue interest at the Commission-authorized rate for deferred accounts.

DEFERRAL MECHANISM

Each year the Company may file a deferral request to defer the incremental costs associated with the implementation and administration of the energy storage pilots. The rate on this schedule recovers only the incremental costs for implementation and administration of energy storage pilots. The deferral will be amortized over one year in this schedule unless otherwise approved by the Oregon Public Utility Commission.

SPECIAL CONDITION

1. Costs recovered through this schedule will be allocated to each schedule using the applicable schedule's forecasted energy on the basis of an equal percent of generation revenue applied on a cents per kWh basis to each applicable rate schedule.