

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 416

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) REPLY OF SMALL BUSINESS UTILITY
COMPANY) ADVOCATES TO PORTLAND GENERAL
) ELECTRIC COMPANY RESPONSE TO
) BENCH REQUEST
Request for a General Rate Revision)
And Power Cost Update)
_____)

Pursuant to Administrative Law Judge (“ALJ”) Lackey’s November 17, 2023 Seventh Set of Bench Requests in this docket, Small Business Utility Advocates (“SBUA”) replies to the Portland General Electric Company (“Company”) Response to Bench Request 7-1 (“Response”).

SBUA agrees with the Response to reinstitute distribution blocking for Schedule 32 and Schedule 532 customers consuming over 5,000 kWh and limiting the block to 3.00 cents per kWh as fair and reasonable to the Schedule 32 and Schedule 532 customers across the docket. SBUA submits that this results in rate design that is fair and reasonable to all Schedule 32 and Schedule 532 customers. Although PGE mentions in its Response that the majority of Schedule 32 customers would pay more than they would under the Fourth Partial Stipulation,¹ the Company does not identify the number of Schedule 32 customers that would pay the over 5000 kWh rate. As the attached worksheet demonstrates there is a significant amount of megawatt hours, 173,690 MWh distributed to customers using over 5 MWh. Exhibit A (PGE Nonconfidential Work paper Rate Design 2024 p2). With the flattening, it is those customers that are burdened with an average weighted increase of almost 40% directly related to the flattening of the rate. Consequently, with the flattening, those larger users would see an increase in their distribution charge by more than 90% with those increases resulting in monthly increases in the hundreds of dollars.

In contrast, the reduction for those customers that use 5,000 kWh or below that the Company highlights would see only around a 2.0% decrease. For example, a customer that uses 500 kWh, would see a saving of approximately \$.57 cents.

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¹ PGE’s Response to Bench Request 7-1 p2.

Fair and reasonable rates for all Schedule 32 and Schedule 532 customers may be achieved in a revenue neutral solution by inserting the block at the rate of three cents (\$.03) per kWh for those Schedule 32 and Schedule 532 customers consuming over 5,000 kWh.

Respectfully submitted: December 6, 2023.

s/Diane Henkels

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PORTLAND GENERAL ELECTRIC

RATE DESIGN

2024

Schedule	Allocated Inputs (\$000)	Billing Determinants		Rate	
		Amount	Unit	Rate	Unit
SCHEDULE 7					
Residential					
Allocations					
	Functional Costs				
	Basic Charge				
	Single-Phase	\$294,292	827,209 Customers	\$29.65	per cust. per mo.
	Three-Phase	\$0	0 Customers	\$0.00	per cust. per mo.
	Trans. & Rel. Serv. Charge	\$62,051	7,901,146 MWh	7.85	mills/kWh
	Distribution Charge	\$341,775	7,901,146 MWh	43.26	mills/kWh
	Franchise Fees & Other	\$35,093	7,901,146 MWh	4.44	mills/kWh
	Energy Charge	\$644,683	7,901,146 MWh	81.59	mills/kWh
	Subtotal	\$1,377,893			
	Pricing				
	Functional Costs				
	Basic Charge				
	Single-Phase-SFH		582,202	\$13.00	
	Single-Phase-MFH		245,007	\$10.00	
	Three-Phase		0 Customers	\$13.00	per cust. per mo.
	Trans. & Rel. Serv. Charge		7,901,146 MWh	7.85	mills/kWh
	Distribution Charge		7,901,146 MWh	65.31	mills/kWh
	System Usage Charge Calculation				
	Franchise Fees & Other		7,901,146 MWh	4.44	mills/kWh
	Cust Impact Offset		7,901,146 MWh	0.00	mills/kWh
	System Usage Charge		7,901,146 MWh	4.44	mills/kWh
	Energy Charge				
	Block 1 (First 500 kWh)		4,319,462 MWh	81.59	mills/kWh
	Block 2 (501-1,000 kWh)		2,204,026 MWh	81.59	mills/kWh
	Block 3 (Over 1,000 kWh)		1,377,658 MWh	81.59	mills/kWh
	Subtotal				
					w/o CIO
SCHEDULE 16					
Outdoor Area Lighting					
Allocations					
	Functional Costs				
	Basic Charge	\$186	8,717 Customers	\$1.78	per cust. per mo.
	Trans. & Rel. Serv. Charge	\$60	13,335 MWh	4.53	mills/kWh
	Distribution Charge	\$449	13,335 MWh	33.69	mills/kWh
	Franchise Fees & Other	\$99	13,335 MWh	7.45	mills/kWh
	Energy Charge	\$805	13,335 MWh	60.37	mills/kWh
	Fixed Charges	\$2,306	13,335 MWh		
	Subtotal	\$3,906			
	Pricing				
	Functional Costs				
	Trans. & Rel. Serv. Charge		13,335 MWh	4.53	mills/kWh
	Distribution Charge		13,335 MWh	47.64	mills/kWh
	System Usage Charge Calc				
	Franchise Fees & Other		13,335 MWh	7.45	mills/kWh
	Cust Impact Offset		13,335 MWh	7.22	mills/kWh
	System Usage Charge		13,335 MWh	14.67	mills/kWh
	Energy Charge		13,335 MWh	60.47	mills/kWh
	Fixed Charges		13,335 MWh		
	Subtotal				
					w/o CIO
SCHEDULE 32					
General Service <30 kW					
Allocations					
	Functional Costs				
	Basic Charge				
	Single-Phase	\$29,816	55,566 Customers	\$44.72	per cust. per mo.
	Three-Phase	\$27,117	41,312 Customers	\$54.70	per cust. per mo.
	Trans. & Rel. Serv. Charge	\$9,848	1,545,473 MWh	6.37	mills/kWh
	Distribution Charge	\$59,743	1,545,473 MWh	38.66	mills/kWh
	Franchise Fees & Other	\$6,273	1,545,473 MWh	4.06	mills/kWh
	Energy Charge	\$114,216	1,545,473 MWh	73.90	mills/kWh
	Subtotal	\$247,014			

