



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

September 27, 2024

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: Advice No. 24-19, Schedule 18, Income Qualified Bill Discount

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rule (OAR) 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 19. with a requested effective date of **March 1, 2025**:

First Revision of Sheet No. 18-1
First Revision of Sheet No. 18-2

As part of the UE 416 Sixth Partial Stipulation to Portland General Electric Company's (PGE or Company) 2024 rate review, OPUC Order No. 23-386 directed PGE to conduct an Energy Burden Assessment (EBA) by June 30, 2024. PGE submitted on June 28, 2024, the results of the Company's 2024 EBA pursuant to that order. Findings were presented to Income Qualified Bill Discount (IQBD) stakeholders on June 25, 2024, and to PGE's Community Benefits & Impacts Advisory Group (CBIAG) on June 26, 2024. Consistent with the terms of the Sixth Partial Settlement, PGE analyzed the assessment's recommendations and is proposing an expansion of its IQBD program accordingly.

PGE's proposed IQBD expansion centers on creation of a new bill discount option for the more than 3,000 households within master-metered affordable housing in PGE's service area. This population segment is disproportionately comprised of low-income and other environmental justice communities but is not currently eligible for IQBD. In addition, PGE proposes a transition to a targeted post-enrollment verification approach in line with EBA recommendations and input from stakeholders that will make post-enrollment verification less burdensome and more effective.

As PGE will lay out in a forthcoming update to be filed in Docket UM 2211, we are pursuing a suite of concrete actions beyond these tariff changes to improve IQBD and other program offerings in direct response to EBA recommendations. This approach reflects PGE's view, informed by the EBA, that the current IQBD design appropriately balances meaningful assistance to energy burdened customers, streamlined customer enrollment, and a manageable cost burden to PGE's customer base, and that the highest priority over the coming year is in improving customer participation rates in IQBD as well as other assistance and bill reduction programs.

The revisions to Schedule 18 update the program and applicability to include non-residential customers under a new special condition. Special Condition 8 allows for master-metered buildings consisting of individual residents. Monthly discount tiers remain for residential customers and a new discount of 25% is applicable to eligible master-metered non-residential customers. In addition, these updates provide clarity that the bill discounts are applied prior to taxes and do not apply to Schedule 300 Charges as defined by the Rules and Regulations and Miscellaneous Charges or optional charges. Language is also updated on enrollment and eligibility.

Additionally, PGE has proposed changes to remove the requirement to conduct fully randomized post-enrollment verification. PGE intends to engage Staff, stakeholders and the CBIAG in advance of the next annual post-enrollment verification cycle to seek input on criteria to apply in an updated, targeted post-enrollment verification approach. The March 1, 2025 effective date is driven by the need to update building systems and program details in advance of launching the program for master-metered customers and the timing of PGE's annual post-enrollment verification process. Following Commission approval of this filing, PGE will work with OHCS in advance of the tariff effective date to identify potentially eligible customers and conduct outreach and enrollment efforts.

A redline version of Schedule 18 is included as a courtesy.

To satisfy the requirements of OARs 860-022-0025(2), PGE provides the following responses:

Beyond the bill discounts provided to participating Residential Customers, there are no price impacts to PGE Customers associated with this Schedule 18 update. Cost recovery for IQBD is implemented in Schedule 118, to be updated in a future advice filing.

Please direct questions to Ashleigh Keene at ashleigh.keene@pgn.com. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing and Tariffs

Enclosures
cc: UE 416 Service List

PGE Advice No. 24-19

Courtesy Redline of Schedule 18

SCHEDULE 18
INCOME-QUALIFIED BILL DISCOUNT - OPTIONAL

PROGRAM DESCRIPTION

This is an optional bill discount for Income-Qualified Residential customers and Non-Residential Customers that qualify under Special Condition 8 of this schedule. This discount is enabled by House Bill 2475, which modified ORS 757.230 to allow for differentiated rates on the basis of affordability factors.

(C)
|
(C)

AVAILABLE

In all territory served by the Company.

APPLICABLE

To Income-Qualified Residential Customers with gross household income at or below 60% of Oregon State Median Income (SMI), adjusted for household size. For Customers in single-person households, eligibility is extended to those with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage. Also applicable to Non-Residential Customers that qualify under Special Condition 8 of this schedule.

(C)
(C)
(C)

MONTHLY DISCOUNT

Monthly bill discounts are calculated as a percentage of bill. Residential Customer discounts are offered at five levels, based on the enrolled Customer's household income as a percentage of SMI.

(C)

Tier	Eligible Percent of SMI	Discount Percentage
A	0-5%	60%
B	6-15%	40%
C	16-30%	25%
D	31-45%	20%
E ¹	46-60%	15%

1. Tier E includes, for single-person households, customers with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage.

Enrolled Customers with a verified Emergency Medical Certificate on their PGE account will be moved to the next highest discount level, if not already qualified for the highest discount level.

Discounts for Non-Residential Customer that qualify under Special Condition 8 will receive a 25% discount.

(N)
(N)

Bill discounts are applied prior to taxes and do not apply to Schedule 300 or optional charges.

(C)

(D)

SCHEDULE 18 (Concluded)

SPECIAL CONDITIONS

1. Program participants must be the accountholder.
2. Household size reflects all permanent residents in the home, including adults and children.
3. Qualifying income refers to total gross annual income, both taxable and nontaxable, from all sources for all persons in the applicant's household.
4. The discount applies only to bills associated with the Customer's permanent primary residence and only to new charges billed after enrollment.
5. PGE Customers who have qualified for the federal Low-Income Home Energy Assistance Program (LIHEAP) or the Oregon Energy Assistance Program (OEAP) and not already enrolled will be automatically enrolled or their discount level will be updated into the appropriate tier if already enrolled. Those who also have a verified Emergency Medical Certificate on their PGE account will automatically be enrolled into the next highest tier, unless they are already eligible for Tier A. Customers who do not wish to receive the discount can contact PGE to be unenrolled. (C)
| (C)
(T)
6. Customers not otherwise automatically enrolled may participate in the program after the approval of an application that includes a declaration of household size and income. Applications can be submitted directly by the Customer or a third-party on behalf of the Customer. Re-enrollment will be required every two years.
7. PGE will require post-enrollment verification of need of no more than 3% of annually enrolled Customers. Those identified for post-enrollment verification will be selected by PGE from participants who were not automatically enrolled or re-enrolled based on their verified eligibility for LIHEAP/OEAP. Customers selected must verify eligibility to continue receiving this discount. If a Customer's discount is discontinued due to non-responsiveness or ineligibility, they may re-enroll upon providing verification of eligibility. Customers who were automatically enrolled based on LIHEAP or OEAP eligibility are exempt from post-enrollment verification. (C)
| (C)
8. The Non-Residential discount is available for master-metered buildings consisting of individual residential units, served under a Non-Residential rate schedule and meeting the following criteria: (N)
| (N)
a. At least 50% or greater of the dwelling units are dedicated to occupants whose income is at 60% or less of state median income;
b. Must qualify as affordable housing with Oregon Housing and Community Services as defined in OAR 330-240-0070(1); and
c. The master-metered customer must attest that it will pass its monthly bill discount back to its low-income occupants on a proportional basis. (N)

SCHEDULE 18 INCOME-QUALIFIED BILL DISCOUNT - OPTIONAL

PROGRAM DESCRIPTION

This is an optional bill discount for Income-Qualified Residential customers and Non-Residential Customers that qualify under Special Condition 8 of this schedule. This discount is enabled by House Bill 2475, which modified ORS 757.230 to allow for differentiated rates on the basis of affordability factors.

AVAILABLE

In all territory served by the Company.

APPLICABLE

To Income-Qualified Residential Customers, ~~defined as Customers~~ with gross household income at or below 60% of Oregon State Median Income (SMI), adjusted for household size. For Customers in single-person households, eligibility is extended to those with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage. Also applicable to Non-Residential Customers that qualify under Special Condition 8 of this schedule.

MONTHLY DISCOUNT

Monthly bill discounts are calculated as a percentage of bill. Residential Customer discounts are offered at five levels, based on the enrolled Customer's household income as a percentage of SMI.

Tier	Eligible Percent of SMI	Discount Percentage
A	0-5%	60%
B	6-15%	40%
C	16-30%	25%
D	31-45%	20%
E ¹	46-60%	15%

1. Tier E includes, for single-person households, customers with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage.

Enrolled Customers with a verified Emergency Medical Certificate on their PGE account will be moved to the next highest discount level, if not already qualified for the highest discount level.

Discounts for Non-Residential Customer that qualify under Special Condition 8 will receive a 25% discount.

~~The bill discounts are applied prior to taxes and do not apply to Schedule 300 or optional charges. applies to most components of a Customer's bill, with a small number of charges not subject to the discount. Excluded charges include the following, where applicable:~~

- ~~Green Future Solar, Fixed and Habitat Optional Charges~~
- ~~Solar Customer Charge for Customers on Solar Payment Option~~
- ~~Energy Efficiency Funding Adjustment (Schedule 109)~~
- ~~Low Income Assistance Charge (Schedule 115)~~

• ~~Meter Rental and Non-Network Meter Read Charges (Schedule 300)~~

~~1. Tier E includes, for single person households, customers with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage.~~

Advice No. 24-19
Issued September 27, 2024
Larry Bekkedahl, Vice President

Effective for service
on and after March 1, 2025

SCHEDULE 18 (Concluded)

SPECIAL CONDITIONS

1. Program participants must be the accountholder.
2. Household size reflects all permanent residents in the home, including adults and children.
3. Qualifying income refers to total gross annual income, both taxable and nontaxable, from all sources for all persons in the applicant's household.
4. The discount applies only to bills associated with the Customer's permanent primary residence and only to new charges billed after enrollment.
5. PGE Customers who have qualified for the federal Low-Income Home Energy Assistance Program (LIHEAP) or the Oregon Energy Assistance Program (OEAP) and not already enrolled will be automatically enrolled or their discount level will be updated into the appropriate tier if already enrolled. Those who also have a verified Emergency Medical Certificate on their PGE account will automatically be enrolled into the next highest tier, unless they are already eligible for Tier A-. Customers who do not wish to receive the discount can contact PGE to be unenrolled.
6. Customers not otherwise automatically enrolled may participate in the program after the approval of an application that includes a declaration of household size and income. Applications can be submitted directly by the Customer or a third-party on behalf of the Customer. Re-enrollment will be required every two years.
7. PGE will require post-enrollment verification of need ~~from a randomly~~ of no more than 3% of annually enrolled Customers. selected 3% of enrolled Customers annually to continue receiving this discount. Those identified for post-enrollment verification will be ~~randomly selected~~ by PGE from among participants who were not automatically enrolled or re-enrolled based on their verified eligibility for LIHEAP/OEAP. Customers selected must verify eligibility to continue receiving this discount. If a Customer's discount is discontinued due to non-responsiveness or ineligibility, they may re-enroll upon providing verification of eligibility. Customers who were automatically enrolled based on LIHEAP or OEAP eligibility are exempt from post-enrollment verification.
8. The Non-Residential discount is available for master-metered buildings consisting of individual residential units, served under a Non-Residential rate schedule and meeting the following criteria:
 - a. At least 50% or greater of the dwelling units are dedicated to occupants whose income is at 60% or less of state median income;
 - b. Must qualify as affordable housing with Oregon Housing and Community Services as defined in OAR 330-240-0070(1); and
 - c. The master-metered customer must attest that it will pass its monthly bill discount back to its low-income occupants on a proportional basis.