

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 435**

In the Matter of  
  
PORTLAND GENERAL ELECTRIC  
COMPANY,

VERDE'S AMENDED CROSS  
EXAMINATION STATEMENT AND  
IDENTIFICATION OF  
CROSS-EXAMINATION EXHIBITS

Request for a General Rate Revision.

**CROSS EXAMINATION STATEMENT**

Pursuant to the Administrative Law Judge (ALJ) ruling issued on September 27, 2024, Verde submits this Cross-Examination Statement and identifies Cross-Examination exhibits for the hearing scheduled for October 10, 2024. Verde has conferred with Portland General Electric Company (PGE) and it has not objection to and will stipulate to the admission of the exhibits listed below. Accordingly, Verde has no cross-examination for any witnesses and agrees to waive the hearing. Should the hearing proceed, Verde reserves the right to conduct follow-up cross examinations of any witness who is cross-examined by another party, the ALJ, or the Commissioners.

**PARTICIPANTS**

Tonia Moro will conduct follow-up cross examination of any witnesses that are cross-examined by other parties or the ALJ, if a hearing occurs. The following members of the Verde team are qualified and may participate in the hearing sessions, Anahi Segovia Rodriguez and Alex Houston.

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## CROSS-EXAMINATION EXHIBITS

Verde submits the following attached cross-examination exhibits for inclusion in the administrative record.

<b>Exhibit Name</b>	<b>Exhibit Number</b>	<b>Witness</b>	<b>Subject Matter</b>
PGE to Verde DR 1, 8, 9, 10, 11, 15, 16 Responses	301 [Composite]	Stipulated	Adv. No 24-19/IQBD/EBA
PGE RE 195 August 2024 Report	302	Stipulated	Arrearages

Dated this 9th day of October, 2024.

/s/ Tonia Moro  
Tonia Moro  
Of Counsel for Verde

October 7, 2024

To: Tonia Moro  
Verde

From: Jaki Ferchland  
Senior Manager, Revenue Requirement

Portland General Electric Company  
UE 435  
PGE Response to Verde Data Request 001  
Dated October 2, 2024

**Request:**

Please provide all documents related to and/or memorializing stakeholder engagement informing the Company's Advice Number 24-19. We are particularly interested in feedback received from stakeholders but also seek confirmation that the materials presented to stakeholders in June and August, linked here (<https://portlandgeneral.com/about/who-we-are/community/community-benefits-and-impacts-advisory-group>), were Company produced or were caused to be produced by the Company.

**Response:**

Stakeholder engagement informing Advice Number 24-19 is summarized in PGE's "Update to EBA Recommendations," filed to UM 2211 on October 4, 2024. Also see Energy Justice Advocates comments filed to UM 2211 on September 12, 2024.

PGE confirms that the CBIAG presentations titled "June 2024" and "August 2024," which are posted on PGE's website, were developed by PGE in consultation with our third-party facilitator, Espousal Strategies. Materials titled "June 2024 Empower Dataworks EBA Recommendations" were developed by PGE's third-party EBA contractor, Empower Dataworks.

October 7, 2024

To: Tonia Moro  
Verde

From: Jaki Ferchland  
Senior Manager, Revenue Requirement

Portland General Electric Company  
UE 435  
PGE Response to Verde Data Request 008  
Dated October 2, 2024

**Request:**

Why did the Company not revise its IQBD program to increase the discount to 50% for the 16-30 SMI tier when it issued Advice Number 24-19?

**Response:**

See PGE's response to Verde Data Request No. 007.

October 7, 2024

To: Tonia Moro  
Verde

From: Jaki Ferchland  
Senior Manager, Revenue Requirement

Portland General Electric Company  
UE 435  
PGE Response to Verde Data Request 009  
Dated October 2, 2024

**Request:**

Why did the Company not adopt the recommendation to create a fund to support community-based organizations to enroll, and re-enroll eligible customers?

**Response:**

PGE explained its decision not to launch a new program navigator fund in its “Update to EBA Recommendations” filed in UM 2211 on October 4, 2024.

At present, PGE partners with both OHCS via Community Action Agencies and Energy Trust to provide program navigation services. Because demand for energy assistance programs frequently outstrip supply and allocations for many programs are not reservable, program navigators would face challenges in enrolling customers efficiently which are unique to Oregon’s assistance framework. As an immediate step, PGE is in the planning stages of developing an online tool for customers to help raise awareness of options and reduce barriers to access programs and tools to help manage with bill management. We estimate that this tool will be available in the second half of 2025.

October 7, 2024

To: Tonia Moro  
Verde

From: Jaki Ferchland  
Senior Manager, Revenue Requirement

Portland General Electric Company  
UE 435  
PGE Response to Verde Data Request 010  
Dated October 2, 2024

**Request:**

Why did the Company choose a March 2025 effective date for the revised IQBD program?

**Response:**

As stated in Advice 24-19, the March effective date was selected to allow appropriate time to update billing systems and program details. This process includes pre-launch outreach and enrollment steps with landlords, as well as stakeholder engagement regarding changes to post-enrollment verification processes.

October 7, 2024

To: Tonia Moro  
Verde

From: Jaki Ferchland  
Senior Manager, Revenue Requirement

Portland General Electric Company  
UE 435  
PGE Response to Verde Data Request 011  
Dated October 2, 2024

**Request:**

There was nothing presented in the UE 416 proceeding that would suggest that the August 2024, revision deadline did not intend an effective date in August or an effective date in 2024, correct?

**Response:**

PGE is not aware of any expectation that the tariff effective date for a new discount program was intended by the Commission order directing PGE to “submit” the new program within 90 days of the EBA. Order 23-386 directed PGE to “complete a low-income needs assessment (LINA) [EBA] by June 30, 2024, and to submit a new discount program informed by the LINA[EBA] within 90 days of receiving the assessment.” Because OPUC rules require tariffs to be filed 30 days prior to their effective date, it is clear that there was no presumption of an effective date in August.

October 7, 2024

To: Tonia Moro  
Verde

From: Jaki Ferchland  
Senior Manager, Revenue Requirement

Portland General Electric Company  
UE 435  
PGE Response to Verde Data Request 015  
Dated October 2, 2024

**Request:**

Why did the Company not adopt the pilot arrearage project, which for an estimated \$1 million dollars could serve 3,000-4,000 IQBD customers who are in arrears, by applying the IQBD discounts to those balances?

**Response:**

PGE explained its decision not to extend retroactive arrearage forgiveness in the amount of the applicable IQBD discount level in its "Update to EBA Recommendations" filed to UM 2211 on October 4, 2024.

PGE has assessed impacts and implications of the arrearage relief approach recommended by the EBA and believes other approaches offer more sustainable benefits to customers, such as a payment matching approach to customer arrearages. However, a more robust stakeholder process through UM 2211 is necessary.



October 7, 2024

To: Tonia Moro  
Verde

From: Jaki Ferchland  
Senior Manager, Revenue Requirement

Portland General Electric Company  
UE 435  
PGE Response to Verde Data Request 016  
Dated October 2, 2024

**Request:**

The EBA states that energy efficiency and weatherization programs can be designed to be cost-effective through realized savings in IQBD discounts, correct? Even when under existing rules/concepts a low-income household weatherization may not satisfy cost-effective standards, it is established that spending on energy efficiency for IQBD customers can directly reduce IQBD discounts for those customers, correct? How has the Company addressed that potential cost-savings in this rate case or in its budgets? What does the Company intend to do? When does it intend to do it? The Company could make permanent its ductless heat pump pilot project to immediately take advantage of that IQBD program cost savings, correct? Why has it not done so?

**Response:**

PGE encourages Verde to refer to consideration of this topic in Docket UM 1893, “Staff Investigation of Methodology and Process of EE Cost-Effectiveness;” see in particular Staff’s July 16, 2024 workshop presentation considering analysis of an arrearage benefit methodology by Energy Trust of Oregon. PGE has been supportive of these efforts. However, energy efficiency avoided cost policy is set by OPUC and applied to program design and implementation work led by Energy Trust of Oregon. PGE’s current actions include engaging constructively in UM 1893 and advancing a co-deployment framework with Energy Trust. Finally, the referenced ductless heat pump pilot is managed and funded by Energy Trust of Oregon, not PGE.



**Portland General Electric**

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

**UE 435 Verde 302/ 1**

August 20, 2024

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

**RE: RE 195 PGE Schedule 18 Income Qualified Bill Discount Reporting  
(May 1, 2024 – July 31, 2024)**

Pursuant to Commission Order No. 22-116 in Docket No. UE 403, Portland General Electric Company (PGE) hereby submits the quarterly report on Schedule 18 Income Qualified Bill Discount (IQBD) detailing monthly data on enrollment, bills, arrears, energy assistance and demographics. In addition, this report provides two additional data points—total and average discount amounts provided by month, tier, and zip code requested by OPUC Staff to better facilitate analysis across utility programs.

As of July 2024, net enrollment has been relatively flat in PGE's IQBD program.

Detailed data reporting for PGE's IQBD program is provided in Attachment A. It includes the following data points for the reporting period May 1, 2024 – July 31, 2024:

- By discount month, tier, and zip code
  - Newly enrolled customer counts
  - Count of customers receiving a bill discount
  - Total discount amounts provided
  - Average discount amounts provided
- By discount month and tier
  - Newly enrolled customer counts
  - Currently enrolled customer counts
  - Count of customers receiving a bill discount
  - Total discount amount
  - Average discount amount
  - Average bill with discount
  - Average bill pre-discount
  - Average residential bill
  - Customers in arrears, by oldest window
  - Average arrears, by window
  - Total arrears, by window
  - Recipients of Energy Assistance in past 12 months

- Statistics for all enrollments, as of July 31, 2024
  - Housing type
  - Household size
  - Fixed income
  - Preferred language
  - Race/Ethnicity

Should you have any questions or comments regarding this filing, please contact Ashleigh Keene at [ashleigh.keene@pgn.com](mailto:ashleigh.keene@pgn.com) Please direct all formal correspondence and requests to the following email address [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing & Tariffs

Enclosure

RE 195  
PGE Schedule 18 Income Qualified Bill Discount Reporting  
(May 1, 2024 – July 31, 2024)

Attachment A

Also provided separately in electronic format

## e-FILING REPORT COVER SHEET



COMPANY NAME: Portland General Electric Company

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION?  No  Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

Select report type:  RE (Electric)  RG (Gas)  RW (Water)  RT (Telecommunications)  
 RO (Other, for example, industry safety information)

Did you previously file a similar report?  No  Yes, report docket number: RE 195

Report is required by:  OAR  
 Statute  
 Order 22-116

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

Other  
 (For example, federal regulations, or requested by Staff)

Is this report associated with a specific docket/case?  No  Yes, docket number: UE 403

List Key Words for this report. We use these to improve search results.

PGE Schedule 18 Income Qualified Bill Discount Reporting

Send the completed Cover Sheet and the Report in an email addressed to [PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 201 High Street SE Suite 100, Salem, OR 97301.

Print

Billing Information for All Enrolled Customers															
	May-24					Jun-24					Jul-24				
	60%	40%	25%	20%	15%	60%	40%	25%	20%	15%	60%	40%	25%	20%	15%
Newly Enrolled	453	202	514	498	389	336	166	462	443	391	335	145	479	496	429
Currently Enrolled	10,796	8,032	25,694	23,435	17,023	11,030	8,057	25,717	23,570	17,038	11,059	8,069	25,503	23,466	16,927
Received Discount ***	10,672	8,096	26,019	23,525	16,989	10,276	7,708	24,646	22,248	16,060	11,053	8,136	25,891	23,643	17,018
Total discount amount (\$)	\$834,411	\$474,891	\$847,421	\$645,110	\$346,694	\$716,838	\$408,258	\$712,437	\$539,246	\$291,347	\$939,531	\$521,221	\$902,992	\$706,643	\$388,936
Average discount amount (\$)	\$78	\$59	\$33	\$27	\$20	\$70	\$53	\$29	\$24	\$18	\$85	\$64	\$35	\$30	\$23
Average bill with discount (\$)	\$61	\$99	\$108	\$120	\$127	\$54	\$89	\$96	\$107	\$113	\$66	\$108	\$116	\$131	\$142
Average bill pre-discount (\$)	\$139	\$157	\$140	\$148	\$147	\$124	\$142	\$125	\$131	\$131	\$151	\$172	\$150	\$161	\$165
Average residential bill (\$)	\$127					\$123					\$154				
Customers in arrears (%) *															
31-60 days	17%	19%	16%	15%	15%	17%	18%	15%	15%	15%	14%	16%	14%	13%	13%
61-90 days	9%	9%	7%	7%	7%	11%	11%	8%	8%	8%	11%	10%	8%	8%	7%
91+ days	7%	5%	3%	2%	2%	8%	6%	4%	3%	2%	9%	7%	4%	3%	3%
Average arrears (\$)															
31-60 days	\$102	\$141	\$142	\$156	\$160	\$91	\$129	\$132	\$140	\$147	\$84	\$114	\$118	\$127	\$130
61-90 days	\$43	\$50	\$45	\$45	\$40	\$43	\$52	\$44	\$45	\$39	\$46	\$57	\$46	\$46	\$45
91+ days	\$43	\$44	\$28	\$24	\$24	\$35	\$38	\$30	\$24	\$25	\$41	\$51	\$32	\$30	\$21
Total arrears (\$) **															
31-60 days	\$204,483	\$222,224	\$571,531	\$540,112	\$407,343	\$172,953	\$177,102	\$480,745	\$437,785	\$350,629	\$139,979	\$146,956	\$405,408	\$379,917	\$276,328
61-90 days	\$102,012	\$102,967	\$294,481	\$272,307	\$192,918	\$110,049	\$118,724	\$299,607	\$273,435	\$202,783	\$104,934	\$98,123	\$268,230	\$257,835	\$185,050
91+ days	\$61,131	\$54,409	\$100,342	\$78,660	\$45,544	\$52,325	\$50,516	\$100,956	\$76,070	\$46,391	\$61,176	\$55,322	\$98,500	\$70,927	\$41,684
Recipients of Energy Asst. in past 12-months (%)	43%	45%	37%	24%	17%	42%	45%	37%	24%	16%	43%	46%	24%	24%	15%

\* A single customer is counted only in the arrears window that contains their longest arrears; however, the arrearages for a single customer are broken out into the windows that reflect those individual dollars. For example, a customer with \$50 that is 40 days past due and \$20 that is 70 days past due would be counted as a customer who is 61-90 days past due but \$50 of their arrears amount is reflected in the 31-60 days average/total statistics and \$20 of their arrears amount is reflected in the 61-90 days average/total statistics.

\*\* Total arrears dollars reflect increases in customer enrollment month over month in addition to any increase in per customer past due balances.

\*\*\* We estimate that roughly 4k customers received an additional bill in late May or early July and thus don't appear in June numbers for having received a discount. We recommend using currently enrolled as a reasonable proxy for customers receiving discounts given that current (net) enrollments have remained relatively flat across this reporting period.