

February 14, 2021



ADV 1365 Advice No. 22-01, Docket Schedule

Portland General Electric Interim Action proposal for Income-Qualified Bill Discount and Bill Discount Cost Recovery Mechanism

Context

On January 13, 2022, PGE filed a request to implement an income-qualified bill discount program and corresponding cost recovery mechanism. In the filing, PGE submitted proposed tariff sheets for the new Schedule 18, detailing the operational tariff language for the discount program and the new Schedule 118, which specifies the adjustment rates, by applicable schedule for PGE's cost recovery mechanism associated with the program.

[ADV 1365](#) is PGE's interim action proposal to bring near term relief to energy burdened customers in advance of the OPUC's longer-term investigation into statewide bill affordability, energy burden, and implementation of House Bill (HB) 2475, the [Energy Affordability Act](#).¹

On January 31, 2022, Staff issued [Reply Comments](#) under UM 2211 providing updated guidance to the utilities regarding interim action. Included in the comments were baseline evaluation criteria that are intended to inform utility filings on:

- Eligibility
- Level of Relief
- Tracking and Accounting
- Bundling
- Outreach and Engagement

PGE performed several rounds of engagement with community advocates, environmental justice groups, and other stakeholders in advance of filing the proposed tariff language and Staff notes that while ADV 1365 was filed in advance of Staff's finalized baseline evaluation criteria, the Company's proposal appears consistent with several of the key design elements identified in the January 31 guidance.

Scope

Staff appreciates and acknowledges that the Company has reached out to numerous groups individually and collectively to help inform the terms of the proposal prior to filing. In the interest of continuing the conversation, post-filing, Staff finds it appropriate to schedule additional engagement where any new and existing stakeholders can focus feedback on how the proposal aligns with Staff's key design elements for HB 2475 interim action (Appendix A) and whether or not changes are needed.

¹ The Energy Affordability Act, House Bill 2475 (2021 regular session) became effective January 1, 2022 and, in part, provides the Commission authority to consider energy burden and other economic, social equity or environmental justice factors in rate design,

Schedule

Staff has identified the following schedule to facilitate the review of PGE's ADV 1365 proposal.

February 24, 2022	Technical workshop (3:00-4:00 PM)
March 10, 2022	Stakeholder comments
March 17, 2022	PGE reply comments
March 31, 2022	Staff recommendation memo
April 5, 2022	Commission decision at Regular Public Meeting
April 15, 2022	PGE Schedule 18 Effective Date

Please direct questions to:

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Appendix A:

Final Baseline Evaluation Criteria for Interim Action

At minimum, Staff will review utility interim rate or program filings for inclusion of the following:					
KEY DESIGN ELEMENTS	Eligibility	Level of relief	Tracking and accounting	Bundling	Outreach and engagement
	<p>Low-barrier enrollment component(s) should be included (e.g. self-certification; categorical eligibility, etc.)</p> <p>Auto-enrollment for energy assistance recipients should be included</p> <p>Options for CBOs to submit eligible customers to the utility should be included</p>	<p>Prioritizes lowest income with the highest energy burden</p>	<p>Monthly zip code level reporting on enrollments for first 12 months, quarterly thereafter unless guidance is updated following the broader investigation. Monthly data should include, but not be limited to:</p> <ul style="list-style-type: none"> • Assistance dollars per customer; • Total and average arrears of participants (by 30, 60, 90+ days aged buckets); • Percentage of EA recipients; • Difference in average bill of participating versus non-participating customer. 	<p>Information sharing with ETO and energy efficiency and weatherization administrating agencies about interim rate and program participants</p>	<p>Transparent and informative</p>
	<p>Eligibility criteria should be income-based in the interim (the broad investigation can explore other criteria)</p>	<p>Utility proposal should explain how the interim rate was designed to provide a meaningful reduction of energy burden (e.g., Staff will look at how PGE considered a target energy burden ceiling (6%) when identifying the income tiers and discount levels provided by the proposed rate)</p>	<p>Program costs are tracked and reported quarterly in a deferral with sufficient detail for ongoing Staff review and discussion</p>	<p>Collaborates with energy efficiency and weatherization partnering agencies on complementary services and potential cross referrals</p>	<p>Regularly scheduled (monthly or quarterly) discussions and consultations with partnering agencies representing or servicing target communities; consolidating with peer utilities where possible</p>
		<p>Allows flexibility or direct engagement opportunities in program design to accommodate enrollments reasonably outside specific eligibility terms</p>	<p>Continued workshops with Staff and Stakeholders on right-sizing data collection and leveraging work done by other agencies; specific attention to more granular reporting of demographic and income data.</p>	<p>Makes energy efficiency or weatherization information and program resources available to participating customers</p>	<p>Demonstrates the Company provided meaningful engagement in advance of filing</p>
					<p>Surveys participating customers and CAP agencies at 3, 6, and 12 months of implementation</p>