



Portland General Electric Company
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August 8, 2024

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: Docket No. UM 2033 – PGE TE Plan, HB 2165 Monthly Meter Charge funding reallocation

Dear Filing Center,

Portland General Electric Company (PGE or the Company) submits this filing to notify Public Utility Commission of Oregon (OPUC or Commission) Staff and stakeholders in UM 2033 of a reallocation of funds from the Company’s House Bill (HB) 2165 Transportation Electrification (TE) Monthly Meter Charge (MMC) budget. ORS 757.357 requires electric companies with 25,000 or more retail customers to collect the MMC and expend the resulting funds to support and integrate transportation electrification (TE), consistent with a budget approved by the Commission.¹

PGE intends to reallocate \$1 million previously budgeted to its Curbside Charging program to instead support incentives in the Company’s Business EV Rebates program. PGE also intends to allocate \$2.8 million in higher-than-anticipated MMC revenues to support the Company’s popular Residential Smart Charging program.

Curbside Charging

The Commission approved PGE’s MMC budget as part of the Company’s 2023-2025 TE Plan with Order No. 23-380², including an \$8,000,000 allocation over the three-year budget to fund a Curbside Charging (Curbside) program focused on providing affordable public charging in close proximity to multifamily residences in disadvantaged communities. After extensive efforts to implement the program, PGE has made the decision to discontinue it due to significant challenges with obtaining third-party pricing consistent with PGE’s public charging rate, risk of and actual vandalism, and a better understanding of the likelihood of investing in what ultimately would be stranded assets. Instead, the Company will shift \$1 million of the Curbside allocation to the current Business EV Rebates program, which was originally approved by the Commission in 2020³ and expanded as part of PGE’s subsequent MMC budgets. The Business EV Rebates program has been proven to serve the targeted market and will otherwise run out of funding for the 2025 program year. The Company proposes to shift the balance of the MMC funds earmarked for the Curbside program in the 2023-2025 TEP to help expand the Business EV Rebates program in 2026, as described in the draft 2026-2028 TE Plan filed July 18, 2025.

Residential Smart Charging

Also as part of the 2023-2025 TE Plan, the Company’s Commission-approved TE budget forecasted \$2.13 million in MMC spending for the Residential Smart Charging program. This did not include funding for panel upgrades or additional outreach and education beyond 2024. As reported in PGE’s 2024 Annual

¹ ORS 757.357 [Oregon Laws 2021, Chapter 95, Section 2](#)

² OPUC Order No. 23-380, retrieved from <https://apps.puc.state.or.us/orders/2023ords/23-380.pdf>

³ OPUC Advice No. 20-19, retrieved from <https://edocs.puc.state.or.us/efdocs/UAA/uaa15947.pdf>

TE Report, however, program managers have found that panel upgrade rebates are needed to support on-going installation of chargers for some customers. At the same time, MMC revenues collected during 2023-2025 have been higher than forecasted, creating an opportunity to augment the current Residential Smart Charging program without incremental cost impact to ratepayers. PGE therefore intends to allocate an additional \$2.3 million to Residential Smart Charging incentives, \$0.07 million to outreach and education, and \$0.45 million to improving the program enrollment process and expanding the program's qualified products list.

Conclusion

PGE discussed its intended reallocation of Curbside funds with stakeholders at a May 15, 2025 workshop and has subsequently reviewed with Staff both this reallocation and the allocation of additional MMC funds to the Residential Smart Charging program. The Company will also provide time during Staff's upcoming August 12, 2025 workshop on the draft 2026-2028 TE Plan for questions regarding this modification if stakeholders have unanswered concerns.

OAR Chapter 860, Division 87 specifies that the MMC budget must be included in the overall TE budget, within electric utilities' transportation electrification plans.⁴ Division 87 also specifies that electric companies must file TE Plan updates to reflect material changes to their plan, which the rule defines as new TE program or infrastructure applications, or program or infrastructure measure changes that require new incremental ratepayer dollars.

This reallocation of funds within PGE's MMC budget is consistent with the purpose of the original budget allocations, will require no additional ratepayer dollars, and supports existing, approved programs without creating new programs or infrastructure measures. Thus, PGE does not view this as a material change to PGE's TE Plan that requires Commission action. The Company will reflect these MMC budget adjustments in its annual TE Plan Report, which is due to the Commission on or before May 1, 2026.

For any questions or comments regarding this filing, please contact Steven Corson at (503) 550-0857. Please direct any communications related to this filing to the following email address: pge.opuc.filings@pgn.com

Sincerely,

/s/ Jason Salmi Klotz

Jason Salmi Klotz,
Senior Manager, Regulatory Strategy & Planning

Cc: Sarah Hall
Eric Shierman
UM 2033 Service List

⁴ OAR Chapter 860, Division 87 [Oregon Secretary of State Administrative Rules](#)