



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204  
portlandgeneral.com

December 30, 2024

***Via Electronic Filing***

Public Utility Commission of Oregon  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: UM 1514 PGE's Application for Reauthorization of Deferral of Incremental Costs  
Associated with Non-Residential Direct Load Control Pilot**

Filing Center,

Enclosed for filing is Portland General Electric Company's (PGE's) application to reauthorize deferred accounting of incremental costs associated with its Non-Residential Direct Load Control Pilot (PGE Rate Schedule 25), also known as the Energy Partner Smart Thermostat pilot, with an effective date of January 1, 2025. PGE received the most recent reauthorization pursuant to Public Utility Commission of Oregon (Commission or OPUC) Order No. 24-332.

PGE originally received authorization for deferral of incremental costs associated with this docket through Commission Order No. 11-182. A Notice of Application regarding the filing of this application has been served by electronic mail to OPUC Docket Nos. UE 435 and UM 1514 service lists.

Thank you for your assistance in this matter. Please direct all formal correspondence, questions, or requests to the following e-mail address: [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com).

Sincerely,

*/s/ Jaki Ferchland*

Jaki Ferchland  
Senior Manager, Revenue Requirement

JF/dm

Enclosure  
cc: Service Lists: UE 435 and UM 1514

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1514**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Application for Deferral of Incremental Costs  
Associated with Automated Demand Response

**APPLICATION FOR  
DEFERRAL  
REAUTHORIZATION**

Pursuant to Oregon Revised Statute (ORS) 757.259, Oregon Administrative Rule (OAR) 860-027-0300, and the Public Utility Commission of Oregon (Commission or OPUC) Orders No. 22-115, 23-451, and 24-332, Portland General Electric Company (PGE) hereby requests approval to continue to defer the incremental costs for the Non-Residential Direct Load Control (DLC) Pilot (Pilot), also known as the Energy Partner Smart Thermostat pilot. The Pilot is subject to the automatic adjustment clause tariff Schedule 135 and operational tariff Schedule 25. PGE requests this reauthorization be effective January 1, 2025, through December 31, 2025. The reauthorization will continue to support the use of an automatic adjustment clause rate schedule, which will provide for changes in prices reflecting incremental costs associated with the Pilot.

Docket No. UM 1514 previously contained two pilots: this Pilot operating under Schedule 25 and the non-residential demand response pilot (also called the Energy Partner Demand Response program) operating under Schedule 26. These two pilots were separated into standalone pilots with separate evaluations for each under Order No. 21-421. In Order No. 22-115, the Commission approved PGE's Flexible Load Multi-Year Plan to include Schedule 26 while keeping Schedule 25 separate in this Docket No. 1514.

## **I. Deferral History**

In alignment with the State of Oregon and Commission policies and requirements, PGE developed the Pilot to help address decarbonization goals, assist customers in managing their energy consumption and total energy costs, and enhance operational performance and efficiency. The Pilot complies with Oregon’s policy direction and supports PGE’s decarbonization, electrification, and performance imperatives.

On November 8, 2021, the Commission issued Order No. 21-421 to approve reauthorization of the deferral for the Pilot as a standalone pilot and noted that the Pilot would be redesigned. On April 15, 2022, PGE filed Advice No. 22-07 to revise the Pilot. The Commission approved the advice filing on May 31, 2022, extending the Pilot through May 31, 2025.

PGE has filed and received reauthorization for this deferral as shown in Table 1, below. PGE seeks reauthorization for deferral of incremental costs associated with the revised Pilot for the period beginning January 1, 2025, through December 31, 2025.

**Table 1**  
**UM 1514 Authorizations**

<b>Filing Date</b>	<b>Deferral Period</b>	<b>Order No.</b>	<b>Approval Date</b>
12/29/2010	1/01/2011 – 12/31/2011	11-182	06-01-2011
12/23/2011	1/01/2012 – 12/31/2012	12-062	02-28-2012
12-27-2012	1/01/2013 – 12/31/2013	13-059	02-26-2013
12-11-2013	1/01/2014 – 12/31/2014	14-019	01-22-2014
12-24-2014	1/01/2015 – 12/31/2015	15-022	01-28-2015
12-18-2015	1/01/2016 – 12/31/2016	16-037	01-26-2016
12-15-2016	1/01/2017 – 12/31/2017	17-105	03-21-2017
09-21-2017	1/01/2018 – 12/31/2018	17-429	10-24-2017
12-20-2018	1/01/2019 – 12/31/2019	19-151	04-23-2019
12-26-2019	1/01/2020 – 12/31/2020	20-259	8-11-2020
11-13-2020	1/01/2021 – 12/31/2021	20-479	12-22-2020
05-28-2021	6/01/2021 – 05/31/2022	21-421	11-8-2021
05-31-2022	6/01/2022 – 05/31/2023	22-485	12-13-2022
06-05-2023	06/01/2023 – 12/31/2023	23-451	11-28-2023
12-29-2023	01/01/2024 – 12/31/2024	24-332	10-01-2024

The Pilot has been consistently administered directly by PGE, with additional support from third-party vendors. PGE adopted this approach primarily to oversee and enhance the customer experience while granting flexibility to offer a diverse range of products, with the potential for adjustments in the future. This method has proven instrumental in acquiring valuable insights and lessons, which will guide our approach as we embark on transitioning this pilot.

The Pilot presents a turnkey, direct load control program, mirroring aspects of PGE's Schedule 5 (Residential DLC pilot) designed for residential customers. The Pilot's framework offers a straightforward avenue for active participation of PGE's nonresidential customer base, accompanied by added value of services associated with one or more smart thermostats. Participants in the Pilot are incentivized to permit PGE to manage their qualified thermostats during direct load control events, with the flexibility for customers to opt out during such occurrences. To qualify for the Pilot, customers must be enrolled in a qualified rate schedule and possess a PGE network meter, a compatible thermostat connected to the customer's internet, and a heating or cooling system meeting specific criteria. For eligibility during the winter event season, customers must have either a ducted heat pump or electric forced air heating. To be eligible for the summer event season, the customer is required to have central air conditioning or a ducted heat pump.

During the most recent deferral period, spanning from January 1, 2024, to December 31, 2024, PGE successfully integrated 520 new thermostats into its program (as of December 9, 2024), resulting in a cumulative total of 2,772 thermostats. Throughout this deferral period, PGE has strategically ramped the growth of the pilot, prioritizing the establishment of a robust foundation for future program stability, cost-effective expansion, and accurate measurement of demand response capacity values during direct load control events.

In 2024, PGE filed a tariff update, incorporating a BYOT option for commercial customers. PGE collaborated with OEMs offering smart thermostats to enhance participant engagement and optimize load management. PGE partnered with three manufacturers capable of performing demand response dispatches via Wi-Fi, enabling load shifting aligned with grid considerations. These partnerships sought to utilize thermostats to reduce customer load during peak times and provide enhanced grid services during Peak Time Events. Following an in-depth study of manufacturer capabilities and customer feedback on their equipment, PGE identified 13 new models that meet the criteria for inclusion in a revised Qualified Product List (QPL), aligning with the Energy Trust of Oregon and BPA Qualified Product Lists. From the additional outreach strategies, we achieved a 260% increase in new thermostat installations compared to last year. This progress has propelled our cumulative total, demonstrating substantial momentum in the program's growth and adoption.

As PGE delves deeper into our analysis, there will be an intentional strategic shift from prioritizing new installations to adopting a broader enrollment strategy aimed at reducing costs and leveraging existing customer equipment. Adapting to the evolving industry landscape, PGE plans to incorporate industry knowledge, pathway enablement, and process assessment while minimizing enrollment friction points and implementing new marketing strategies to reach eligible customers.

The forecast for 2025 includes increased marketing and outreach efforts with an expectation of elevated total enrollment. Understanding the drivers and motivators for thermostat adoption and product enrollment from our customers will inform adjustments to the product's design and delivery. The insights gained from evaluations will be implemented to enhance program performance metrics, and collaboration with stakeholders will ensure efficiency savings are appropriately claimed, contributing to the attainment of organizational program goals.

PGE anticipates a vendor transition in the early part of the year, aligning with ongoing efforts to support program growth and customer engagement. The discontinuation of the ecobee EMS-si will require replacement thermostats for Direct Install customers as early as 2025, as these devices will no longer support demand response dispatch after losing ecobee support. This effort will run in parallel with continued customer outreach, building on the growth achieved in 2024 and driving anticipated expansion that goes beyond addressing the existing fleet.

## **II. OAR 860-027-0300 Requirements**

The following is provided pursuant to OAR 860-027-0300(3):

a. Description of Utility Expense for Which Deferred Accounting is Requested.

See Deferral History above.

b. Reasons for Deferral

PGE seeks reauthorization to defer the expenses associated with the Pilot. Without reauthorization, this deferral will expire on December 31, 2024. The continuation of the deferral will minimize the frequency of rate changes and match appropriately the costs borne by and benefits received by customers. The reauthorization will continue to support the use of an automatic adjustment clause rate schedule, which will provide for changes in prices reflecting incremental costs associated with the Pilot.

c. Proposed Accounting for Recording Deferred Amounts.

PGE proposes to record the deferral as a regulatory asset in FERC Account 182.3 (Other Regulatory Assets) and credit the appropriate FERC expense accounts. When specific identification of the particular source of the regulatory asset cannot be reasonably made, then FERC account 407.4 (Regulatory Credits) will be credited. In the absence of a deferred accounting order, the costs would be debited to the appropriate cost accounts.

d. Estimate of Amounts to be Recorded for the Twelve Months of 2025.

PGE estimates the amounts to be deferred for the Pilot over the twelve months of 2025 to be approximately \$1.4 million.

e. Notice

A copy of the notice of application for reauthorization of the deferred accounting treatment is attached to the application as Attachment A. In compliance with the provisions of OAR 860-027-0300(6), PGE is serving the Notice of Application on the UM 1514 Service List and the UE 435 Service List.

The following is provided pursuant to OAR 860-027-0300(4):

a. Description of Utility Expense for Which Deferred Accounting is Requested.

See Deferral History above.

b. Reasons for Continuation of Deferred Accounting

See Reason for Deferral above.

**III. PGE Contacts**

The authorized addresses to receive notices and communications in respect to this Application are:

Kim Burton  
Assistant General Counsel III  
Portland General Electric Company  
1WTC1301  
121 SW Salmon Street  
Portland OR 97204  
(573) 356-9688  
E-mail: kim.burton@pgn.com

PGE-OPUC Filings  
Rates & Regulatory Affairs  
Portland General Electric Company  
1WTC0306  
121 SW Salmon Street  
Portland OR 97204  
(503) 464-7805  
E-mail: pge.opuc.filings@pgn.com

In addition to the names and addresses above, the following are to receive notices and communications via the e-mail service list:

Stephanie Meeks, Regulatory Consultant  
E-mail: [stephanie.meeks@pgn.com](mailto:stephanie.meeks@pgn.com)

#### **IV. Summary of Filing Conditions**

a. Earnings Review

Cost recovery for the Pilot will be subject to an automatic adjustment clause rate schedule and will not be subject to an earnings review under ORS 757.259.

b. Prudence Review

A prudence review should be performed by the Commission Staff as part of their review of this deferral's annual reauthorization filing or application to update Schedule 135.

c. Sharing

Under deferred accounting, all prudently incurred costs are to be recoverable by PGE with no sharing mechanism.

d. Rate Spread/Rate Design

The deferred costs for this Pilot as recovered through Schedule 135 will be allocated to each schedule using the applicable schedule's forecasted energy based on an equal percent of generation revenue applied on a cent per kWh basis to each applicable rate schedule or in a manner approved by the Commission.<sup>1</sup>

e. Three Percent Test (ORS 757.259(6))

The amortization of the Pilot's deferred costs will be subject to the three percent test in accordance with ORS 757.259(6) and (8), which limits aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year.

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<sup>1</sup> Special Condition 1 of Schedule 135

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V. Conclusion

For the reasons stated above, PGE requests permission to continue to defer the incremental costs associated with the Pilot effective January 1, 2025.

Dated this December 30th, 2024.

Respectfully Submitted,

*/s/ Jaki Ferchland*

Jaki Ferchland

Senior Manager, Revenue Requirement

Portland General Electric Company

121 SW Salmon Street, 1WTC0306

Portland, OR 97204

Telephone: 503.464.7488

E-Mail: Jacquelyn.Ferchland@pgn.com

**UM 1514**  
**Attachment A**

Notice of Application to Reauthorize Deferred Accounting of Costs Associated  
with the Non-Residential Direct Load Control Pilot

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1514**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Application for Deferral of Incremental Costs  
Associated with Automated Demand Response.

**NOTICE OF APPLICATION FOR  
DEFERRAL  
REAUTHORIZATION**

On December 30, 2024, Portland General Electric Company (PGE) filed an application with the Public Utility Commission of Oregon (Commission or OPUC) for an Order reauthorizing the deferral of incremental costs associated with the Non-Residential Direct Load Control Pilot (Pilot).

Approval of PGE's reauthorization application will continue to support the use of an automatic adjustment clause rate schedule, which will provide for changes in rates reflecting incremental costs associated with the Pilot.

Persons who wish to obtain a copy of PGE's application will be able to access it on the OPUC website.

Any person who wishes to submit written comments to the Commission on PGE's application must do so no later than January 30, 2025.

Dated December 30, 2024.

*/s/ Jaki Ferchland*

Jaki Ferchland  
Senior Manager, Revenue Requirement  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503.464.7488  
E-Mail: [Jacquelyn.Ferchland@pgn.com](mailto:Jacquelyn.Ferchland@pgn.com)

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **Notice of Application to Reauthorize Deferred Accounting of Costs Associated with the Non-Residential Direct Load Control Pilot** to be served to those parties whose e-mail addresses appear on the attached service lists for OPUC Docket Nos. UE 435 and UM 1514.

Dated at Portland, Oregon, on December 30, 2024.

*/s/ Jaki Ferchland*

Jaki Ferchland  
Senior Manager, Revenue Requirement  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0306  
Portland, OR 97204  
Telephone: 503.464.7488  
E-Mail: Jacquelyn.Ferchland@pgn.com

**SERVICE LIST**  
**OPUC Docket No. UE 435**

**AWEC**

NANNETTE MOLLER (C) (HC) AWEC	nmm@dvclaw.com
CORRINE OLSON (C) (HC) DAVISON VAN CLEVE	1750 SW HARBOR WAY, STE. 450 PORTLAND OR 97201 coo@dvclaw.com
TYLER C PEPPLER (C) (HC) DAVISON VAN CLEVE	107 SE WASHINGTON ST STE 430 PORTLAND OR 97214 tcp@dvclaw.com

**CALPINE SOLUTIONS**

GREGORY M. ADAMS (C) RICHARDSON ADAMS PLLC	515 N 27TH ST BOISE ID 83702 greg@richardsonadams.com
GREG BASS CALPINE ENERGY SOLUTIONS, LLC	401 WEST A ST, STE 500 SAN DIEGO CA 92101 greg.bass@calpinesolutions.com
KEVIN HIGGINS (C) ENERGY STRATEGIES LLC	215 STATE ST - STE 200 SALT LAKE CITY UT 84111-2322 khiggins@energystrat.com

**CHARGEPOINT**

ANDERSON BEALS (C) SHERMAN SHERMAN JOHNNIE & HOYT LLP	693 CHEMEKETA ST. NE SALEM OR 97301 anderson@shermlaw.com
SCOTT DUNBAR (C) KEYES & FOX	1580 LINCOLN ST, STE 880 DENVER CO 80203 sdunbar@keyesfox.com
MAL SKOWRON (C) CHARGEPOINT	254 EAST HACIENDA AVE CAMPBELL CA 95008 mal.skowron@chargepoint.com

**FRED MEYER**

JUSTIN BIEBER FRED MEYER/ENERGY STRATEGIES LLC	215 SOUTH STATE STREET, STE 200 SALT LAKE CITY UT 84111 jbieber@energystrat.com
KURT J BOEHM BOEHM KURTZ & LOWRY	36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com
JODY KYLER COHN BOEHM KURTZ & LOWRY	36 E SEVENTH ST STE 1510 CINCINNATI OH 45202 jkylercohn@bkllawfirm.com

**NEWSUN ENERGY**

MARIE P BARLOW NEWSUN ENERGY LLC	550 NW FRANKLIN AVE STE 408 BEND OR 97703 mbarlow@newsunenergy.net
LESLIE SCHAUER NEWSUN ENERGY LLC	550 NW FRANKLIN AVE STE 408 BEND OR 97703 leslie@newsunenergy.net
JACOB (JAKE) STEPHENS NEWSUN ENERGY LLC	550 NW FRANKLIN AVE STE 408 BEND OR 97703 jstephens@newsunenergy.net

**OREGON CITIZENS UTILITY BOARD**

	ROBERT JENKS (C) (HC) OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
	Share OREGON CITIZENS' UTILITY BOARD OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
	CLAIRE VALENTINE- FOSSUM OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY STE 400 PORTLAND OR 97205 claire@oregoncub.org
<b>PGE</b>		
	KIM BURTON (C) (HC) PORTLAND GENERAL ELECTRIC	121 SW SALMON STREET PORTLAND OR 97204 kim.burton@pgn.com
	JAKI FERCHLAND (C) (HC) PORTLAND GENERAL ELECTRIC	121 SW SALMON ST. 1WTC0306 PORTLAND OR 97204 jacquelyn.ferchland@pgn.com
	SHAY LABRAY (C) PORTLAND GENERAL ELECTRIC	21 SW SALMON STREET PORTLAND OR 97204 shay.labray@pgn.com; pge.opuc.filings@pgn.com

**STAFF**

STEPHANIE S  
 ANDRUS (C) (HC)  
 Oregon Department of Justice  
 BUSINESS ACTIVITIES SECTION  
 1162 COURT ST NE  
 SALEM OR 97301-4096  
 stephanie.andrus@doj.oregon.gov

CURTIS DLOUHY (C) (HC)  
 PUBLIC UTILITY  
 COMMISSION OF OREGON  
 PO BOX 1088  
 SALEM OR 97308-1088  
 curtis.dlouhy@puc.oregon.gov

**VERDE**

TONIA L MORO (C) (HC)  
 ATTORNEY AT LAW PC  
 106 TALENT AVE STE 6  
 TALENT OR 97540  
 tonia@toniamoro.com

CARRA SAHLER (C) (HC)  
 LEWIS & CLARK LAW  
 SCHOOL  
 10101 S TERWILLIGER BLVD  
 PORTLAND OR 97219  
 sahler@lclark.edu

ANAHI SEGOVIA  
 RODRIGUEZ (C) (HC)  
 VERDE  
 anahisegovia@verdenw.org

**WALMART**

JUSTINA A  
 CAVIGLIA (C) (HC)  
 PARSONS BEHLE &  
 LATIMER  
 50 WEST LIBERTY ST STE 750  
 RENO NV 89501  
 jcaviglia@parsonsbehle.com

JAIME MCGOVERN (C)  
 WALMART STORES, INC.  
 2608 SOUTHEAST JST. SUITE B  
 BENTONVILLE AL 72712  
 jaime.mcGovern@walmart.com

RONI SHAFFER (C)  
 PARSONS BEHLE &  
 LATIMER  
 50 WEST LIBERTY ST STE 750  
 RENO NV 89501  
 rshaffer@parsonsbehle.com

**SERVICE LIST**  
**OPUC DOCKET NO. UM 1514**

STEPHANIE S ANDRUS (C) Oregon Department of Justice	BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@doj.state.or.us
KIM BURTON PORTLAND GENERAL ELECTRIC	121 SW SALMON STREET PORTLAND OR 97204 kim.burton@pgn.com
JAKI FERCHLAND PORTLAND GENERAL ELECTRIC	121 SW SALMON ST. 1WTC0306 PORTLAND OR 97204 jacquelyn.ferchland@pgn.com
MICHAEL GOETZ OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY STE 400 PORTLAND OR 97205 mike@oregoncub.org
ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
MITCH MOORE (C) PUBLIC UTILITY COMMISSION OF OREGON	PO BOX 1088 SALEM OR 97308-1088 mitch.moore@puc.oregon.gov
BRADLEY MULLINS MW ANALYTICS, ENERGY & UTILITIES	LUMMINTIE 13 OULU FI-90460 brmullins@mwanalytics.com
TYLER C PEPPLER DAVISON VAN CLEVE	107 SE WASHINGTON ST STE 430 PORTLAND OR 97214 tcp@dvclaw.com
Share PGE RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC	PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0306 PORTLAND OR 97204 pge.opuc.filings@pgn.com
JESSE D. RATCLIFFE OREGON DEPARTMENT OF ENERGY	1162 COURT ST NE SALEM OR 97301-4096 jesse.d.ratcliffe@doj.state.or.us
WENDY SIMONS OREGON DEPARTMENT OF ENERGY	550 CAPITOL ST NE 1ST FL SALEM OR 97301 wendy.simons@energy.oregon.gov

S BRADLEY VAN CLEVE (C)  
DAVISON VAN CLEVE

1750 SW HARBOR WAY STE  
450  
PORTLAND OR 97201  
bvc@dvclaw.com

KATHY ZARATE (C)  
PUBLIC UTILITY  
COMMISSION OF OREGON

201 HIGH ST SE STE 100  
SALEM OR 97301  
kathy.zarate@puc.oregon.gov