

Chapter 2. Planning

2.1 Policy

2.1.1 Regulatory Context

The Flex Load activities described herein are in service to the acquisition goals of 211MW Summer and 158MW winter demand response by 2028. These goals were laid out in PGE’s 2019 IRP¹¹ and 2023 IRP/CEP¹², and associated Addendum¹³.

Table 4. PGE’s Flex Load Activities, Filings, Dockets, Deferrals, and Rate Schedules

Flex Load Activity	Filings and Docket(s)	Deferral(s)	Rate Schedule(s) ¹⁴
Demonstrations and Small-scale Pilots (Smart Grid Testbed)	<ul style="list-style-type: none"> 2018 Smart Grid Testbed Proposal 2021 Smart Grid Testbed Phase II Proposal 	Originally ADV 859 ¹⁵ , currently UM 1976 ¹⁶	Schedule 13
Programs and Larger Scale Pilots	<ul style="list-style-type: none"> 2020 Flex Load Plan¹⁷ 2021 Flex Load Multi-Year Plan¹⁸ 2022 Flex Load Multi-Year Plan Update¹⁹ 	Costs for all pilots and programs are recovered via UM 2234 ²⁰ except Multi-family Water Heating via UM 1827 ²¹ and	Schedules 4, 5, 7, 25, 26, with Schedule 135 serving as a balancing account

¹¹ PGE (2019). *PGE 2019 Integrated Resource Plan*. Retrieved from <https://edocs.puc.state.or.us/efdocs/HAA/lc73haa162516.pdf>.

¹² PGE (2023). LC 80 – Portland General Electric Company’s 2023 Clean Energy Plan and Integrated Resource Plan. Retrieved from <https://edocs.puc.state.or.us/efdocs/HTB/lc80htb8430.pdf>.

¹³ PGE (2023). LC 80 – Portland General Electric Company’s 2023 Clean Energy Plan and Integrated Resource Plan Addendum: Portfolio Analysis Refresh. Retrieved from <https://edocs.puc.state.or.us/efdocs/HTB/lc80htb16164.pdf>.

¹⁴ PGE. *Tariffs & Rate Schedules*. Retrieved from <https://portlandgeneral.com/about/info/rates-and-regulatory/tariff>.

¹⁵ PGE (2018). *Testbed Proposal*. Retrieved from <https://edocs.puc.state.or.us/efdocs/UAC/adv859uac113045.pdf>.

¹⁶ PGE (2021). *Smart Grid Testbed Phase II Proposal*. Retrieved from <https://edocs.puc.state.or.us/efdocs/HAD/um1976had145212.pdf>.

¹⁷ PGE (2020). *Flexible Load Plan 2021*. Retrieved from <https://edocs.puc.state.or.us/efdocs/HAA/haa125814.pdf>.

¹⁸ PGE (2021). *Flexible Load Plan 2022-2023*. Retrieved from <https://edocs.puc.state.or.us/efdocs/HAD/um2141had16243.pdf>.

¹⁹ PGE (2022). *Flexible Load Plan Update*. Retrieved from <https://edocs.puc.state.or.us/efdocs/HAD/um2141had163540.pdf> (not taken up, as per PGE’s request).

²⁰ OPUC. *UM 2234 Application for Deferral of Costs Associated with the Flexible Load Demand Response Pilots*. Retrieved from <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23208>.

²¹ OPUC. *UM 1827 PGE Deferred Costs of Demand Response Water Heater Pilot*. Retrieved from <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=20726>.

Flex Load Activity	Filings and Docket(s)	Deferral(s)	Rate Schedule(s) ¹⁴
		Nonresidential Direct Load Control via UM 1514 ²²	
Transportation Electrification pilots	<ul style="list-style-type: none"> 2019 Transportation Electrification Plan 2023 Transportation Electrification Plan 	Residential Smart EV Charging via UM 2003 ²³	Schedule 8
Other small-scale pilots	<ul style="list-style-type: none"> 2020 Storage Potential Evaluation (for Smart Battery Pilot) 	UM 2078 ²⁴	Schedule 14
PGE+	<ul style="list-style-type: none"> Voluntary Customer Information Platform²⁵ Voluntary On-Bill Repayment Service²⁶ 	n/a	Schedules 342 and 343, respectively

2.1.2 Related Filings

2.1.2.1 Distribution System Plan

The Distribution System Plan lays out PGE’s plans and accompanying investment activity in its distribution system over the near-term (two-to-four years) and long-term horizons (ten years). The MYP is a component of the DSP’s near-term action plan specific to flexible load customer programs²⁷. These customer programs reflect PGE’s investment in distributed energy resources and are part of the broader context of distribution investments contemplated in the DSP, including the build-out of a bi-directional energy platform, as well as required grid modernization and orchestration under a virtual power plant. PGE plans to file the DSP in December 2024.

2.1.2.2 Clean Energy Plan/Integrated Resource Plan

PGE is actively developing an Update to the 2023 CEP/IRP to be filed with the Oregon PUC. Throughout its development PGE will continue to hold monthly roundtable discussions to inform

²² OPUC. *UM 1514 Application for Deferral of Incremental Costs Associated with Automated Demand Response*. Retrieved from <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=16575>.

²³ OPUC. *UM 2003 PGE Deferral of Costs and Revenues Associated with EV Charging Pilots*. Retrieved from: <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=21817>.

²⁴ OPUC. *UM 2078. PGE Deferral of Costs Associated with Residential Battery Energy Storage Pilot*. Retrieved from <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=22381>.

²⁵ PGE (2024). *Schedule 343 Voluntary Customer Information Platform*. Retrieved from https://assets.ctfassets.net/416ywc1laqmd/4W5Cxc6lbwbMunIX7PSylE/14dae25fe495e9d97caafa7ea03180d7/Sched_343.pdf. Filed with Advice No. 24-15 New Schedule 343, in Docket No. UE 442, available here: <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=24256>.

²⁶ PGE (2024). *Advice No. 24-16 New Schedule 342 PGE Voluntary On-Bill Repayment Service*. Retrieved from <https://edocs.puc.state.or.us/efdocs/UAA/uaa330511025.pdf>.

²⁷ Note that there is some overlap between the customer programs funded via the MYP and those funded via the Transportation Electrification Plan (more detail on the latter in [Section 2.1.2.3](#), below).

stakeholders of plans and progress and to solicit feedback in the process of developing the CEP/IRP Update.

The CEP/IRP Update will focus on the changes made to emissions forecast modeling. It will include a comparison of the forecasted emissions from the 2023 CEP versus actual emissions and demonstrate PGE's continuous progress to reach emissions targets. Known major drivers of change include updated forecasts of demand, load, resource portfolio, emissions, and cost. Finally, this filing will include a conversation regarding changes in the planning environment, system needs, and resource options, and will include studies on the non-emitting energy market and transmission options.

2.1.2.3 Transportation Electrification Plan

One of the three strategic pillars of PGE's 2023 Transportation Electrification Plan (TEP) was to manage transportation electrification (TE) load:

- PGE seeks to effectively manage TE load, enabling and scaling managed charging with vehicle telematics and delivering flexible load and Virtual Power Plant MWs.
- PGE will structure TE rates and tariffs to incent "grid-friendly" behaviors, developing rates that motivate charging behavior, support grid health, load siting investment (e.g., make-ready), and meet policy requirements.²⁸

PGE's TE activities are budgeted via UM 2033, but we include their Flex Load MW in the MYP portfolio totals to present a holistic picture of Flex Load across the portfolios. As of filing, Residential EV Charging already contributes Flex Load MW; other TE activities such as commercial fleet charging are being built as "managed charging ready" and are expected to contribute Flex Load in future cycles.

2.1.2.4 Smart Grid Testbed

The Smart Grid Testbed²⁹ facilitates various demonstrations that test smart grid technology and customer programs that explore the use of more sustainable resources, how Distribution Side Management activities can help keep energy prices lower and explore pathways to invest in future projects that may create Oregon jobs and a healthier environment.

Detail on SGTB activities can be found in [Section 4.1.1](#) and [Appendix B](#).

2.1.3 Related State and Federal Activity

With the passage of HB 2021 during the Oregon's 81st Legislative Session, PGE must meet decarbonization targets outlined in the legislation. The legislation carries with it significant policy changes. Local engagement and local energy infrastructure investment was a major theme of the Bill. PGE views flexible load as a major component in meeting the mandates and intent of the HB 2021 as

²⁸ PGE (2023). *2023 Transportation Electrification Plan*. Retrieved from <https://edocs.puc.state.or.us/efdocs/HAH/um2033hah15818.pdf>

²⁹ OPUC Docket No. UM 1976 *PGE DEFERRAL OF EXPENSES ASSOCIATED WITH DEMAND RESPONSE TESTBED PILOT* available at <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=21662>.

Schedule 13 SMART GRID TESTBED PILOT, retrieved from https://assets.ctfassets.net/416ywc1laqmd/1FXchtG1UCoqK74YIOWBoF/699972c24ae1b34287acf24744206db9/Sched_013.pdf.

flexible load development is inherently a non-emitting local customer resource capable of providing benefits to the customer, the community, and the electric system.

The (Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA)³⁰, both passed by Congress subsequent to PGE’s last full MYP (filed in November 2021) and provide significant funding and incentives to support the adoption and integration of DERs and EVs. See [Section 3.4.5](#) and [Section 4.3](#) for detail on PGE’s coordination with the Energy Trust and others on these opportunities.

In 2023, the United States Department of Energy (US DOE) awarded PGE a \$50MM grant to accelerate and deploy grid edge computing, which will, amongst other benefits, enable the DER integration.³¹

PGE currently leverages Federal funding in its Flexible Feeder SGTB project ([Appendix B.5](#)) and in coordination efforts underway with the Energy Trust on measure co-deployment ([Section 3.4.3](#)). PGE also plans to leverage federal tax credits when we propose Phase 2 of the Smart Battery Pilot (expected mid-year 2025).

2.1.4 Related Regional Activity

2.1.4.1 Wholesale and Regional Market Activity

The Western Energy Imbalance Market (WEIM) offer two participation models for Demand Response:

Table 5. Demand Response in the Western Energy Imbalance Market

Participation Model	Description	Model Requirements
Local Forecast Adjustment	Also known as non-Participating, load-modifying, non-market	Allow entities control of dispatch and hourly scheduling and are not directly price responsive. This model does not have metering, telemetry, or performance methodology requirements, opting to instead provide program accountability via company attestation.
Supply-side Demand Response	Includes Proxy Demand Response (PDR), Reliability Demand Response, DER Aggregation, and Non-Generating Resource	Dispatched by real time market prices/conditions and are bid into the market. These programs have Settlement Quality Metering Data, telemetry and performance methodology requirements.

³⁰ 117th Congress (2021-22). *House Rule 5376 Inflation Reduction Act of 2022*. Retrieved from <https://www.congress.gov/bill/117th-congress/house-bill/5376>.

³¹ US DOE: Grid Deployment Office (2023). *Fact Sheet: Grid Resilience and Innovation Partnerships Program*. Available at https://www.energy.gov/sites/default/files/2023-11/DOE_GRIP_2123_Portland%20General%20Electric%20Company_v4_RELEASE_508.pdf.

Today, PGE represents all Demand Response programs in WEIM in the Load Forecast Adjustment model. This model best aligns with PGE's current demand response program when considering metering, telemetry, and customer program design. The Load Forecast Adjustment model allows PGE's DR to account for reductions to PGE's load in the WEIM Resource Sufficiency Evaluations (RSE). When PGE calls a DR event, the California Independent System Operator (CAISO) established process, as stated in the CAISO DR Business Practice Manual, requires entities to submit demand response forecast one day prior to the event to the CAISO Short Term Forecasting team. After which, the process can follow two distinct paths, determined by that team and communicated back to PGE via email: a) CAISO makes an adjustment to the Short-Term Load Forecast, or b) entities enter the event in CAISO's tools:

- **Short Term Load Forecast Adjustment:** CAISO has stated when they make the adjustment to the Short-Term Load Forecast, they adjust the full amount of load reduction provided in the forecast. Therefore, the DR event is represented in the RSE by virtue of reduction in the load forecast used for the RSE calculations. CAISO does not have a defined process to modify the values after the decision is made.
- **Real Time Base Schedule DR Conformance in Balancing Authority Area Operations Portal:** After PGE receives notification from CAISO's Short Term Load Forecasting team to enter the DR event in the portal, a PGE Balancing Authority Operator enter the values. The RTBS adjustment allows for the Authority to enter both hourly and 15-minute interval DR Conformance values. These values are used in CAISO's RSE calculations, in accordance with the CAISO Business Process Manual, and therefore provide us credit for our DR events in the RSE tests.

In both above cases, CAISO's Persistence in their Load Forecast Models will see the reduction in load and will therefore adjust future intervals to account for the change in load. This introduces an additional unknown variable and makes it challenging for PGE to accurately represent our DR programs after the initial load reduction starts. Additionally, this issue also occurs at the end of a DR event, after the load comes back, impacting the accuracy of the load forecasts after the event.

PGE has partnered with other WEIM entities to facilitate discussions with CAISO on opportunities to improve DR programs within WEIM allowing for greater participation and transparency. Improvements include improving the Load Adjustment model to represent DR as a non-participating resource, clearly delineating load forecast and resources. This would allow better transparency in load forecasts for current and future intervals when Load Adjustment models participate and reduce modeling inefficiencies. Additional improvements to the Load Forecast Adjustment model include capability of modeling programs at a fifteen-minute granularity to better accommodate ramping and more precise use of programs. In addition to the improvements to the Load Forecast Adjustment model, PGE is also recommending a DR feedback mechanism to CAISO's Persistence Short-Term Load Forecasting System. There are currently different ideas about how this should be implemented, but the general idea is to represent the reduction of load to the Persistence Forecast Model so it does not attempt to adjust the load forecast, which will improve its accuracy during DR events.

PGE has also expressed support for a WEIM Demand Response working group model that allows for WEIM entities to define problem statements related to WEIM participation that could be used to drive CAISO stakeholder initiatives. CAISO is just finishing their process to determine the upcoming year's priority of initiatives via the Annual Policy initiatives roadmap process. This process will help define stakeholder's priorities and enable CAISO to commit resources to the effort.

2.1.4.2 Demand Response and the Western Resource Adequacy Program

PGE is participating in discussions regarding the Western Resource Adequacy Program (WRAP). The WRAP is a regional collaborative meant to help the region collectively plan for capacity needs. PGE has advocated for demand response to receive credit for its capacity contribution through WRAP's Resource Adequacy Participants Committee process. This resource adequacy credit is another source of valuation or benefit that can be ascribed to PGE's demand response and Flex Load investments. Within WRAP, demand response programs can receive credit in one of two ways: submitted as a Qualifying Resource or as a load shaving capability in the forward showing demonstration.

To date, PGE has submitted demand response as load shaving capability. In doing so, PGE's peak load demonstration + Planning Reserve Margin is lowered by the amount claimed in the forward showing. To claim DR as a load shaving capability, PGE must demonstrate the load reduction capability in an actual event, or a Capability Test every five years during a peak season. The load reduction must be greater than 1MW and the duration of the load shaving can be a period anywhere from one hour to up to five hours. The Qualifying Capacity Contribution value of the DR is determined by multiplying the capability test load reduction in MWs by the number of hours the resource can demonstrate load reduction capability divided by five. An Operational Test must be conducted annually during a peak season and at a minimum of 50% of the DR program's claimed load reduction capability for a minimum of one hour.

2.1.4.3 Northwest Energy Efficiency Alliance: Market Transformation

PGE provides core funding to the Northwest Energy Efficiency Alliance via its funding agreement with the Energy Trust of Oregon. In addition to this long-standing commitment and investment in energy efficiency market transformation, PGE is contributing funding to a NEEA special project, the 2024-2025 End Use Load Flex Project, leveraging NEEA's expertise advancing flexible load management in the Pacific Northwest. The EULF Project brings together utility funders from Oregon and Washington (in addition to PGE, Avista Utilities, Chelan Public Utility District (PUD), Clark PUD, Emerald PUD, Pacific Power, Puget Sound Energy, Seattle City Light, Snohomish PUD, Tacoma Power are also funders).

The EULF Project's goals are to identify regional interests and enable sharing of information to amplify efforts and avoid duplication. NEEA and the funding utilities will develop a comprehensive EULF Market Transformation Portfolio that will promote technologies inclusive of open-source communication standards that can be leveraged by utilities and aggregators for the benefit of the grid without impacting the customer experience. NEEA will apply its expertise in market transformation to influence stakeholders, prioritize scalable products/designs that meet utility and grid needs, and deliver efficiencies of scale on behalf of the region. Key accomplishments by end of Q3 2024 include the following:

Task 1 EULF Flexibility Steering Committee and Portfolio:

- Convened Steering Committee of representatives from all funding utilities, ratified workplan and charter, convened monthly
- Spotlighted individual utility program portfolios and key learnings (4 to date)
- Defined EULF Portfolio vision and prioritized grid value drivers
- Conducted one Regional Meeting open to stakeholders from across the region, providing project updates

Task 2 Flexible Demand Solutions (Emerging Technology):

- Established guiding principles for EULF market transformation design
- Conducted “Connectivity Fundamentals” training, open to all employees from all funders
- Established three product workstreams and associated work groups of utility members to study efficient pathways to drive open-source connectivity, identify needed technology features to enable/enhance load flex capabilities, and examine the motivational messages and incentives required to achieve market adoption. Most projects are ahead of schedule with in-field activity started by Q3 or planned for Q4.
 - Residential Water Heaters
 - Multi-Family Line Voltage Thermostats
 - Commercial Water Heaters
- Kicked off two enabling projects to study individual performance of embedded controls technology in dominant water heater brands and to assess the cyber security of various communication protocols

Task 3 Product Prioritization & Initial Insights Research:

- Completed inventory Pacific Northwest load flex pilots, programs and time varying rates /TOD rate details
- Completed draft inventory national load flex pilots, programs and time varying rates/TOD rate details (prioritized by reported results)

For the remainder of 2024 and 2025, NEEA will continue to convene the Steering Committee in service to the above objectives of the project, further develop the load flex market transformation portfolio; continue field studies, analyze results, and pursue implementation of recommendations with the market; and leverage national load flex inventory to complete primary research on customer attitudes and needs.

PGE and NEEA continue to explore opportunities for targeted activity in the PGE service area. We will engage Staff on any resulting proposal (and funding) through our quarterly Demand Response Advisory Group meetings.

2.1.4.4 Regional Technical Forum

The Regional Technical Forum is a “technical advisory committee to the Northwest Power and Conservation Council (NWPC or Council) established in 1999 to develop standards to verify and evaluate energy efficiency savings”³². During the 2020-2024 funding cycle, the RTF expanded its core

³² Northwest Power and Conservation Council (retrieved August 7, 2024). *Regional Technical Forum page*. Retrieved from <https://rtf.nwccouncil.org/>.

mission to include conducting technical analysis on technologies which provide both energy efficiency and demand response potential, the goal being to assist the Council in assessing the technical potential of these technologies in a holistic manner.

To assist the region with flexible load development, PGE and the RTF partnered on an application to the US DOE's Connected Communities Funding Opportunity Announcement. This work includes co-deployment, alongside NEEA and the Energy Trust, of measures capable of providing both EE and flexible load.

In the 2025-2029 funding cycle, in addition to the demand response budget for specific analysis around DR products, the RTF Policy Advisory Committee agreed to use some demand response funds to analyze energy efficiency measures which also provide demand response potential (i.e., flexible measures). The RTF will estimate the per-unit technical demand impact potential for technologies, independent of specific product design considerations. The purpose of this work is to provide an additional input into Council and utility demand response supply curves. The work in the 2025 to 2029 funding cycle builds upon the RTF's previous work on demand response, enhancing those analytical capabilities, maintaining modeling tools for demand response, and also regional support. The demand response work in the first year of this funding cycle (2025) will focus on the update of the existing demand response technologies and development of shapes for common demand response program types.

2.2 Rates and Regulatory

2.2.1 Standardize Seasons, Holidays (Schedules 5, 7 option, 8, and 25)³³

As PGE's VPP resources grow in scale and importance there is an emerging opportunity to make some adjustments to standardize the customer experience across programs, as well as to increase the flexibility and value realized by these programs. The activities being considered for adjustment include Smart Thermostat (Schedule 5), Peak Time Rebates (Schedule 7), Residential EV charging (Schedule 8), Energy Partner Thermostat (Schedule 25), and Energy Partner On-Demand (Schedule 26).

Seasons

PGE has four seasonal programs, Smart Thermostat, Peak Time Rebates (PTR), Energy Partner Thermostat, and Energy Partner On-Demand. The first proposed change is to standardize the seasons across programs and participants, which simply includes adding November to the Winter season for Smart Thermostat customers to align it with the other programs.

The second proposed seasonal change is to give PGE flexibility as to the beginning and ending of the seasons depending on meteorological or grid system conditions. For example, should there be a heat event either at the end of May or the beginning of October PGE would have the flexibility to dispatch its programs to preserve grid reliability and manage customer prices³⁴.

³³ Note that Schedule 4 (Multifamily Water Heating) does not contain seasons or holiday stipulations.

³⁴ Due to the reservation payment structure of Energy Partner On Demand this program is not being adjusted to include the seasons flexibility provision at this time.

Table 6. Proposed Schedule/Tariff Summer and Winter Seasons³⁵

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Smart Thermostat												
Peak Time Rebates												
Energy Partner Thermostat												
Energy Partner On-Demand												

Above **highlighted cells** reflect proposed changes.

Holidays

Currently most of the flexible load programs have provisions in the tariffs prohibiting dispatch/call on holidays, including the Monday after the holiday if the holiday occurs on a weekend. PGE proposes to standardize the declared holidays among all programs and remove the restriction of program dispatch of the closest weekday for holidays that fall on a weekend.

Customer Research Regarding Potential Schedule Changes

PGE conducted survey research from February 2024 to May 2024 and received over 1,100 responses across the two programs. We found that Peak Time Rebates and Smart Thermostat participants were overwhelmingly amenable to expanding the schedule to allow for dispatch during extreme events, as illustrated in [Figure 1](#), below.

³⁵ As noted in the preceding paragraphs, we propose seasons which would typically begin at these times, with latitude to accommodate meteorological outliers and/or grid system conditions.

Peak Time Rebate Participants

Smart Thermostat Participants

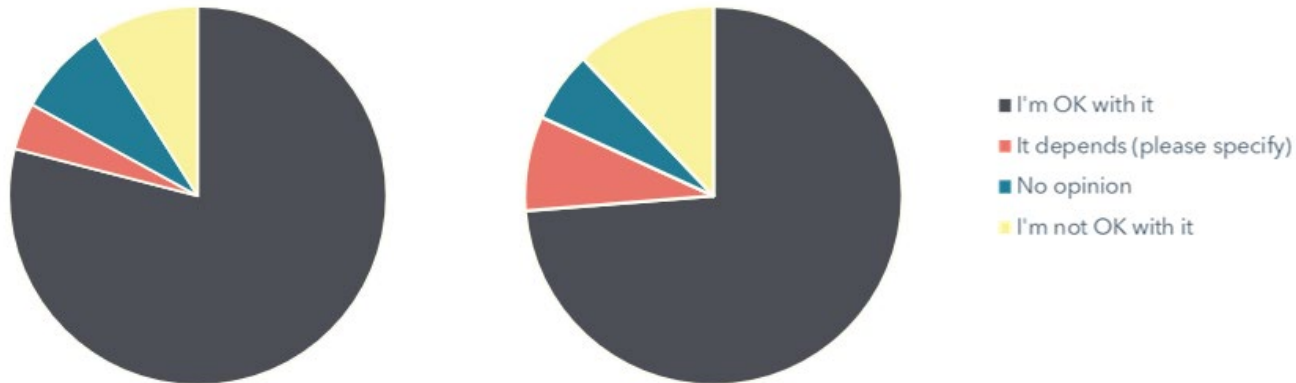


Figure 1. Participant Receptiveness to Changes in Demand Response Event Scheduling

When asked for open ended feedback on why a customer would not be amenable to the change, a few customers were hesitant to agree to events on major holidays. More information and more opportunities for rebates may have influenced customers’ responses.

The final questions asked customers if there was anything else they would like to share about the proposed program changes. Customers used the opportunity to discuss issues with their thermostats, dissatisfaction about rate increases, and other comments related to the programs in general, however few mentioned their thoughts on the expansion of the program days.

A full report of the survey findings can be found in [Appendix C](#).

2.2.2 Smart Grid Testbed (Schedule 13)

Schedule 13 provides availability, enrollment, and participation information for PGE Smart Grid Testbed demonstrations, which in some cases include additional incentives available to customers participating in the rate schedules described above. Schedule 13 is updated as required as subsequent demonstrations are scoped in collaboration with the Demand Response Review Committee and approved by the OPUC (via Docket No. UM 1976). Schedule 13 was updated on July 10, 2024 with Vehicle to Everything implementation details. PGE expects to continue to make updates to Schedule 13 as needed for implementation of the Smart Grid Testbed activities discussed in Appendix A but has not put forward updates as part of this plan.

2.2.3 Public Charging Rate (Schedule 50)

Schedule 50 is PGE’s retail rate for public charging at PGE owned fast charging and level 2 chargers. Schedule 50 currently has a peak price adder of \$0.19/kWh from 3 PM to 8 PM Monday through Friday to encourage customers to charge outside of system peak timeframes. The current rate is based on PGE’s legacy Schedule 7 time varying rates rate which was the active time varying rates program when the schedule was created. PGE is working to update the peak timeframe and peak cost to align with the company’s currently approved Schedule 7 time of day rate. This would shift the on-peak timeframe to 5-9 PM Monday through Friday and update the peak price adder to \$0.28/kWh.

2.2.4 Commercial Time-of-Use (Schedules 38, 83, 85, and 89)

Commercial customers have a peak period and rate applicable to all customers in the rate class. Peak is currently 6 PM to 10 PM Monday through Saturday. In the 2024 rate settlement, the OPUC directed PGE to update peak pricing to more accurately reflect power costs as part of any upcoming rate case.

In the 2025 rate review, PGE proposed to move from a two-tier to a three-tier time varying rates for **Schedules 38, 83, 85, and 89**. PGE is implementing the proposed changes, which require that ~2,000 meters be physically replaced, ~12,000 meters be re-programmed, and that updates be made to billing and customer IT systems to transition these rates to interval billing. PGE expects these efforts to conclude by the end of 2024.

2.2.5 Voluntary Customer Information Platform (Schedule 343)

PGE also appreciates the Commission's ongoing engagement as we prepare **Voluntary Customer Information Platform** schedules³⁶ to facilitate continued growth of the residential Flex Load activity.

³⁶ PGE (2024). *Schedule 343 Voluntary Customer Information Platform*. Retrieved from https://assets.ctfassets.net/416ywc1laqmd/4W5Cxc6lbwbMunIX7PSylE/14dae25fe495e9d97caafa7ea03180d7/Sched_343.pdf. Filed with Advice No. 24-15 New Schedule 343, in Docket No. UE 442, available here: <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=24256>.
PGE (2024). *Advice No. 24-16 New Schedule 342 PGE Voluntary On-Bill Repayment Service*. Retrieved from <https://edocs.puc.state.or.us/efdocs/UAA/uaa330511025.pdf>.