



Oregon

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Department of Environmental Quality

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UM 1461

Investigation of Matters Related to Electric Vehicle Charging

Combined Response to Opening Comments and Bench Request

Comments from Oregon Department of Environmental Quality

Oregon DEQ appreciates the Public Utility Commission's review of issues raised by the increased use of electric vehicles. We welcome this opportunity to offer the perspective of a state agency concerned with protecting air quality.

The use of electric vehicles in place of conventionally-powered cars and trucks provides multiple benefits for the public and particular benefits for Oregon's air quality. These include reduced greenhouse gas emissions, lower emissions of pollutants that generate ground-level ozone (smog) and lower emissions of hazardous air pollutants such as benzene, 1-3 butadiene, acetaldehyde, acrolein and formaldehyde. At the same time electric vehicles may save motorists money by reducing fuel and operational costs while moving the state to a more sustainable footing.

Given these benefits, Oregon DEQ is generally interested in avoiding the creation of barriers to electric vehicle use and charging.

We are also interested in notifying the PUC of potential new regulations being developed by DEQ that may touch on the scope of this investigation. Specifically, the department is working Low Carbon Fuel Standards that may play a significant role in moving the state closer to greenhouse gas emission reduction goals adopted by the 2007 Legislature as HB 3543. If Low Carbon Fuel rules are adopted by the Environmental Quality Commission, electric vehicles may be significant in reducing the life-cycle carbon intensity of transportation fuels. That is because electricity used as a transportation fuel has a low carbon intensity and could generate credits that can be sold to offset the higher carbon intensity of gasoline and diesel.

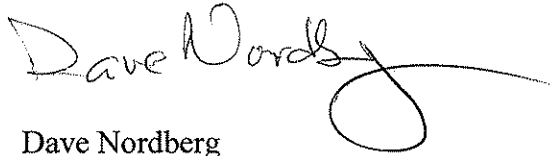
As implemented in California, such credits may be generated by a variety of parties. Bundled service providers—companies that make a business of providing electric vehicle charging—have the first opportunity to generate and claim Low Carbon Fuel credits. Electric utilities and charging equipment owners may participate as well.

One requirement of California's program (and potentially Oregon's) is that vehicle charging needs to be metered to determine the amount of credits generated.



Therefore, to the extent that electricity used to charge vehicles is metered separately from other electrical uses, that information may have the collateral benefit of establishing the amount of Low Carbon Fuel credits being generated.

Respectfully submitted,

A handwritten signature in black ink that reads "Dave Nordberg". The signature is fluid and cursive, with a large loop at the end of the last name.

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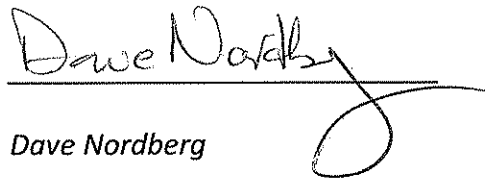
CERTIFICATE OF SERVICE

UM 1461

I, Dave Nordberg of Oregon Department of Environmental Quality hereby certify that on this day I served a copy of Combined Response to Opening Comments and Bench Request for UM 1461 upon each person indicated on the service list by electronic mail.

Dated this 10th day of February, 2011, at Portland, Oregon.

Oregon DEQ



Dave Nordberg

Transportation Specialist

Air Quality Division

See attached service list.



eDockets

Docket Summary

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Docket No: UM 1461

Docket Name: INVESTIGATION INTO RATE STRUCTURES FOR ELECTRIC VEHICLE CHARGING

[Print Summary](#)

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Investigation of matters related to electric vehicle charging. (Staff report for December 8, 2009, Public Meeting [Item No. 4]; filed by Ed Durrenberger.) (Public Meeting Information is located...

Filing Date: 12/8/2009

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<u>ACTIONS</u>	<u>SERVICE LIST (Parties)</u>	<u>SCHEDULE</u>
W=Waive Paper service	C=Confidential HC=Highly Confidential	Sort by Last Name Sort by Company Name
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