

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1461

In the Matter of)

INVESTIGATION INTO RATE)
STRUCTURES FOR ELECTRIC)
VEHICLE CHARGING)

**CLOSING COMMENTS OF THE
CITIZENS' UTILITY BOARD OF OREGON**

April 1, 2011



BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1461

In the Matter of)
)
)
 INVESTIGATION INTO RATE) CLOSING COMMENTS OF THE
 STRUCTURES FOR ELECTRIC) CITIZENS' UTILITY BOARD OF
 VEHICLE CHARGING) OREGON
)
)
 _____)

I. Introduction

CUB appreciates the opportunity to submit closing comments in this docket. A number of parties submitted thought-provoking comments in the opening round and in response to the Commission's bench request, but for the most part it appears that the parties participating in this docket are on the same page. My purpose in submitting these comments is primarily to reiterate a few key points regarding CUB's stance on emerging technologies in the EV and Smart Grid fields.

II. Ford-Microsoft Collaboration

On March 10, 2011, PGE hosted a presentation by Ford and Microsoft to discuss the companies' collaborative efforts in advancing technology for metering EV charging. The project involves Ford's emerging Focus Electric, which will be released in November 2011, and the Microsoft Utility Rate Service (MURS), that company's new platform that provides an interface for consumers to view available rate options from electric utilities. This platform will aggregate rate information from Microsoft's utility

partners, store the information on a secure server, and allow customers to access the relevant rate information based on their location (defined by ZIP code). Customers will be able to see detailed descriptions of all rate plans that are available from their utility, allowing them to make informed choices that best fit their household usage profile. Utilities will benefit from the use of a system that reduces the need for direct customer support contact and is inexpensive to maintain and update.

Ford also intends to utilize MURS in the charging software onboard the Focus Electric. The vehicle will be able to communicate with MURS to determine the vehicle owner's rate plan and the time that it is charging to coincide with the most favorable rates under a time-of-use plan.

CUB sees a great deal of potential in this particular technology, as it takes advantage of the most intelligent features of the new emerging class of EVs. MURS should allow for an easier customer experience in selecting rates, while Ford's new vehicles will help EV owners minimize their charging costs. While not specifically recommending that Oregon utilities become partners with Microsoft and utilize the MURS service, CUB does recommend that utilities move quickly to adopt this type of technology.

The capability of the Focus Electric and other EVs to utilize onboard technology to meter electricity and report usage to utilities, either via MURS or another platform, is the next logical step here, and it is likely that such technology will be available in the very near future. Such technology will, as stated in CUB's prior testimony in this docket,¹ enable utilities to take advantage of the existing capabilities of the EV and/or EVSE and avoid expensive metering upgrades to provide separate metering for EV

¹ CUB Combined Response to Opening Comments and Bench Request, page 4.

owners. This will allow for better consumer choice in terms of rate plans, as well as lower overall system costs to the utility.

Respectfully Submitted,
April 1, 2011

A handwritten signature in black ink, appearing to read 'Gordon Feighner', with a long horizontal flourish extending to the right.

Gordon Feighner
Utility Analyst
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, OR 97205
gordon@oregoncub.org

UM 1461– CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of April, 2011, I served the foregoing **CLOSING COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1461 upon each party listed in the UM 1461 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending an original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

- | | | | |
|----------|--|----------|--|
| W | DEPARTMENT OF JUSTICE
MICHAEL T WEIRICH
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@doj.state.or.us | W | DEPARTMENT OF ENERGY
VIJAY A SATYAL
SENIOR POLICY ANALYST
625 MARION ST NE
SALEM OR 97301
vijay.a.satyal@state.or.us |
| W | DEPARTMENT OF JUSTICE
JANET L PREWITT
ASSISTANT AG - NAT RSRCS
1162 COURT ST NE
SALEM OR 97301-4096
janet.prewitt@doj.state.or.us | W | DEPARTMENT OF ENERGY
RICK WALLACE
625 MARION ST NE
SALEM OR 97301-3737
rick.wallace@state.or.us |
| W | CLEANFUTURE
JOHN A THORNTON
625 NW 17TH AVE
PORTLAND OR 97209
john.thornton@cleanfuture.us | W | ETEC
DAVE MAYFIELD
308 SW FIRST AVE. SUITE 181
PORTLAND OR 97204
dmayfield@etecevs.com |
| W | ECOTALITY, INC.
ALANA CHAVEZ-LANGDON
80 E RIO SALADO PKWY, STE 710
TEMPE AZ 85281
achavez@ecotality.com | W | IDAHO POWER COMPANY
CHRISTA BEARRY
PO BOX 70
BOISE ID 83707-0070
cbearry@idahopower.com |
| W | GRIDMOBILITY, LLC
JAMES HOLBERY
PRESIDENT
PO BOX 2066
KIRKLAND WA 98083-2066
jdh@gridmobility.com | W | IDAHO POWER COMPANY
DARLENE NEMNICH
SENIOR PRICING ANALYST
PO BOX 70
BOISE ID 83707-0070
dnemnich@idahopower.com |

W IDAHO POWER COMPANY
LISA D NORDSTROM
PO BOX 70
BOISE ID 83707-0070
lnordstrom@idahopower.com

W MCDOWELL RACKNER GIBSON
ADAM LONEY
419 SW 11TH AVE, STE 400
PORTLAND OR 97205
adam@mcd-law.com

W IDAHO POWER COMPANY
MICHAEL YOUNGBLOOD
SENIOR PRICING ANALYST
PO BOX 70
BOISE ID 83707
myoungblood@idahopower.com

W MCDOWELL RACKNER GIBSON
LISA F RACKNER
ATTORNEY
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205
lisa@mcd-law.com

W MCDOWELL RACKNER GIBSON
WENDY MCINDOO
OFFICE MANAGER
419 SW 11TH AVE., STE 400
PORTLAND OR 97205
wendy@mcd-law.com

W NW ENERGY COALITION
WENDY GERLITZ
SR POLICY ASSOCIATE
4422 OREGON TRAIL CT NE
SALEM OR 97305
wendy@nwenergy.org

W NISSAN N. AMERICA, INC.
TRACY L WOODARD
ONE NISSAN WAY
FRANKLIN TN 37067
tracy.woodard@nissan-usa.com

W DEPARTMENT OF JUSTICE
PAUL S LOGAN
NATURAL RES SECTION
1515 SW 5TH AVE, STE 410
PORTLAND OR 97201
paul.s.logan@doj.state.or.us

W DEPARTMENT OF ENERGY
WALLACE RICK
625 MARION STREET NE
SALEM OR 97301-3737
rick.wallace@state.or.us

W OREGON DEQ
SUE LANGSTON
811 SW SIXTH AVE
PORTLAND OR 97204-1390
sue.langston@state.or.us

W OREGON DEQ
DAVID COLLIER
811 SIXTH AVE
PORTLAND OR 97204
david.collier@state.or.us

W PACIFICORP
RYAN FLYNN
825 NE MULTNOMAH, STE 1800
PORTLAND OR 97232
ryan.flynn@pacificorp.com

W OREGON DEQ
DAVE NORDBERG
811 SIXTH AVE
PORTLAND OR 97204
dave.nordberg@state.or.us

W PGE
RATES & REG AFFAIRS
121 SW SALMON ST, 1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

W PACIFICORP

W PGE

OREGON DOCKETS
825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

DOUG KUNS
121 SW SALMON ST 1WTC0702
PORTLAND OR 97204
doug.kuns@pgn.com

W PGE
RICK DURST
121 SW SALMON ST 1WTC1711
PORTLAND OR 97204
rick.durst@pgn.com

W PUBLIC UTILITY COMMISSION
ADAM BLESS
PO BOX 2148
SALEM OR 97308
adam.bleess@state.or.us

W PGE
J RICHARD GEORGE
121 SW SALMON ST 1WTC1301
PORTLAND OR 97204
richard.george@pgn.com

W MITSUBISHI MOTORS R&D
DAVID N PATTERSON
6430 KATELLA AVE
CYPRESS CA 90630
david.patterson@na.mitsubishi-motors.com

W MITSUBISHI MOTORS R&D
JORGEN WETERRINGS
6430 KATELLA AVE
CYPRESS CA 90630
jweterrings@mmsa.com

W ECOTOALITY LEGAL COUNSEL
DANIEL BATES
121 SW MORRISON ST., STE 1500
PORTLAND OR 97204
dbates@thornrun.com

**W SMART GRID OREGON /
ECOTALITY COUNSEL**
BARRY T WOODS
5608 GRAND OAKS DR
LAKE OSWEGO OR 97035
woods@sustainableattorney.com

Respectfully submitted,



John C. Sturm, OSB #105174
Staff Attorney
Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
Portland, OR 97205
(503) 227-1984
john@oregoncub.org