



Portland General Electric Company
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April 1, 2011

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

**Re: UM 1461 – INVESTIGATION INTO RATE STRUCTURES FOR ELECTRIC
VEHICLE CHARGING INFRASTRUCTURE**

Attention Filing Center:

Enclosed for filing in UM 1461 are an original and five copies of:

Final Comments of Portland General Electric Company

This document is being filed by electronic mail with the Filing Center. An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

This document is being served upon the UM 1461 service list.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Richard George".

J. Richard George
Assistant General Counsel

JRG:smc
Enclosures
cc: Service List-UM 1461

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

UM 1461

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	FINAL COMMENTS OF
OREGON)	PORTLAND GENERAL
)	ELECTRIC COMPANY
Investigation of Matters Related to)	
Electric Vehicle Charging)	

With these final comments, PGE aims to summarize recommended approaches for OPUC policy and guidelines. PGE's perspective and position has not changed from the filing of our original comments to the staff straw proposal and comments to the bench request.

From a thorough read of all the comments submitted in the docket, it is quickly apparent that parties have philosophical differences in approaching this nascent EV market stage. During the workshop, OPUC staff noted the importance of regulating the utility role, reporting requirements, rate design and incentives to encourage off-peak use from the "get-go." PGE, PacifiCorp, Idaho Power, Mitsubishi, and others emphasized unintended consequences of creating obstacles for EV customers or disincentives for prospective purchasers of EVs. CUB noted the unintended obstacles created for residential energy efficiency in the number of steps required of the customer, and encouraged caution in the EV docket. CUB also commented that the EV market is developing and we have to assume there will be significant changes over time. It

emphasized that in a couple years, we will likely revisit the issues in light of such developments.

PGE echoes its earlier, and the majority of, comments and encourages the Commission to act only if necessary, be flexible, and allow time for the market to develop. Stakeholders must first learn more about customer charging practices, the need for EV charging infrastructure in given locations (in particular where the need may not be met by a still emerging EVSE provider market), and the potential for secondary uses of batteries for storage.

In short, PGE recommends the Commission adopt policies that acknowledge:

- Valuable learning will come from the data collected by the EV Project and Idaho National Lab.
- Existing utility time-of-use options for customers to charge EVs off-peak are useful and sufficient. The Commission should NOT mandate a separately metered end-use EV TOU rate.¹
- Charging “last to the system” customers who add EVSE for distribution upgrades is not the preferred approach; it is reasonable to assign costs of distribution upgrades to all customers.
- Education and outreach to customers regarding EVs is critical for utilities. Education and outreach messages will benefit from the learning’s of the EV Project.
- Inclusion of EVs in utility load and demand management planning is desirable as vehicle penetration increases and battery functionality allows vehicle to building or vehicle to grid operation. The Commission should NOT mandate specific guidelines for inclusion in utility Integrated Resource Plans.²

¹ To further illustrate, an EV driver who drives 1,000 miles per month at 250 kwh per month would pay about \$25.00 per month at the retail rate. At a time-of-use rate, the same customer pays about \$17.50/month for a savings of \$7.50 per month. A separate meter charge could quickly eat up the TOU savings.

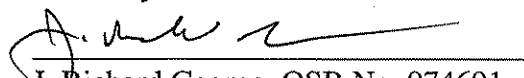
² PGE agrees with comments made by PacifiCorp at the workshop that the Commission, in the IRP acknowledgment docket, may order EV analysis in the IRP context but it is not appropriate to issue such guidelines in this docket. Consideration of additional IRP guidelines should be made in the full context of a utility’s IRP, penetration of EVs, two way (grid to vehicle and vehicle to grid) EV battery functionality, and the likelihood that EVs may serve as a source of flexible capacity.

- All ratepayers benefit from conversion of petroleum derived transportation fuels to electricity-based transportation fuels. Assigning costs of developing and implementing EV rates among all ratepayers, rather than the smaller class of EV drivers, in the first years is reasonable. The Commission should NOT assign costs to a small emerging class of EV drivers as this would make the program cost prohibitive.
- Utility ownership of publicly available EVSE may be reasonable, if prudently invested and necessary to serve customers, and no private competitive EVSE provider is willing to place the EVSE. The Commission should NOT at this time limit utility ownership of EVSE to that undertaken by a non-regulated affiliate but instead evaluate specific utility proposals, if they are made.
- In particular, the Commission should allow the utilities to participate in the EV Project. In some scenarios, utilities may be requested to host sites for public EVSE. Absolute limits to regulated utility EVSE ownership may be an impediment to achieving the goals of the EV Project.

We thank you for this opportunity to comment and appreciate the efforts of all parties and Staff in working to develop an appropriate regulatory framework to help usher in a new era of transportation electrification.

DATED, this 1st day of April, 2011.

Respectfully submitted,

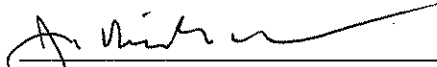


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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY's FINAL COMMENTS** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UM 1461.

Dated at Portland, Oregon, this 1st day of April, 2011.



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UM 1461

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