



**Portland General Electric Company**

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**Barbara W. Halle**

*Associate General Counsel*

June 13, 2017

*Via Electronic Filing*

Oregon Public Utility Commission

Attention: Filing Center

PO Box 1088

Salem OR 97308-1088

**Re: UM 1811- Application for Transportation Electrification Programs**

Attention Filing Center:

Enclosed for filing in the above-captioned docket please find Portland General Electric Company's ("PGE") Opposition to Petition to Intervene by Electric Vehicle Charging Association.

This filing is filed by electronic mail with the Filing Center.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Halle", is written over a faint blue line.

Barbara W. Halle

BWH:lgh

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1811

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY

Application for Transportation Electrification  
Programs

PORTLAND GENERAL ELECTRIC'S  
OPPOSITION TO PETITION TO  
INTERVENE BY ELECTRIC VEHICLE  
CHARGING ASSOCIATION

Portland General Electric Company ("PGE") hereby opposes the Petition to Intervene in Docket No. UM 1811 that has been filed herein by Electric Vehicle Charging Association (EVCA). According to standards governing intervention in OAR 860-001-0300, EVCA's intervention must not unreasonably broaden the issues, burden the record, or delay the proceeding. PGE asserts that EVCA's participation will not materially add new or different information to the docket given that its founding members ChargePoint and EVConnect have already expressed opinions in this docket, as has EVCA member SemaConnect (along with multiple other electric vehicle service equipment providers). In addition, all but one party, Chargepoint, have settled all issues in PGE's Application for Transportation Electrification Programs and a stipulation will be filed in the docket later this week or early next week. EVCA's intervention is an attempt by ChargePoint to now broaden the issues (given the settlement) and delay the proceeding.

1. **EVCA's interests are adequately represented by current intervenors in this docket.**

**Multiple EVCA members have already filed correspondence in this docket.**

EVCA was founded by ChargePoint and EVCA has historically taken positions that are virtually identical to those of ChargePoint in regulatory proceedings and in the public venue.<sup>12345</sup> Further,

<sup>1</sup> [Docket No. 16-TRAN-01 "SB 350 Transportation Electrification \(Publicly Owned Utilities\)"](#)

<sup>2</sup> [Docket No. 16-ALT-02 "2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program"](#)

<sup>3</sup> [Docket No. U-39-E "Application of Pacific Gas and Electric Company for Approval of its Electric Vehicle Infrastructure and Education Program"](#)

EVCA's assertion, in its petition to intervene, that the interests of "EV companies that sell, own, install, service, and maintain charging stations and power distribution units, support the commercialization of new alternative fuel and renewable energy technologies, and develop and operate software for the management of charging stations and EV drivers" would not be represented if not for the intervention of EVCA, is not correct. In fact, multiple EVCA members have filed comment in this docket. The testimony of Drive Oregon (now known as Forth), filed April 24, 2017<sup>6</sup>, contained a letter to Commissioners from "companies that produce and manage electric vehicle charging and service equipment" urging Commissioners to approve PGE's proposed transportation electrification program. This letter is signed by EVConnect and SemaConnect, both EVCA members. The Drive Oregon (Forth) letter expressed confidence that the "competitive RFP process... would allow open competition." Further, Greenlots – an electric vehicle service equipment provider – has intervened and filed testimony in this docket, and is joining in the stipulation to be filed.

2. **Intervention of EVCA at this stage is a blatant attempt to delay the proceeding and, given the status of the stipulation, the timing of the petition is extremely suspect.**

On May 19, PGE – with the support of other parties in this docket – filed a motion to suspend the procedural schedule to allow for continued negotiation of a stipulation to settle the issues in this docket. Administrative Law Judge Harper subsequently granted the motion, and parties have tentatively reached stipulation. As indicated in PGE's June 9 status report to Judge Harper, one party – ChargePoint – has not agreed to the stipulation. On the same day, EVCA filed to intervene in this docket, and has asked for the ability to "fully participate in proceedings." Such participation is likely to both delay the proceedings and burden the record with no new or different information that the Commission needs to consider.

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<sup>4</sup> "Don't Give PG&E Control over Northern California EV Charging" Damon Conklin, March 21, 2016.

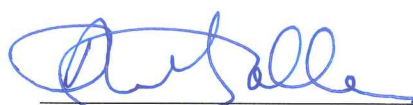
<sup>5</sup> "EV Charging in the Golden State: Preserving Customer Choice and Innovation for California" Damon Conklin, June 23, 2016.

<sup>6</sup> Drive Oregon/100 Shaw/8/Attachment 3

In light of the pending settlement between parties in this docket, and the adequate representation that electric vehicle service equipment providers have received in this docket to date through testimony, technical conferences, written correspondence to the Commissioners, and settlement talks, PGE requests that the OPUC deny EVCA's petition to intervene.

Dated this 13th day of June, 2017

Respectfully submitted,



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