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November 30, 2017

*Via Email: [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)*

Attn: Filing Center  
Public Utility Commission of Oregon  
201 High Street SE  
Salem, Oregon 97301-3398

**Re: UM 1811- PGE's Reply Brief to ChargePoint/EVCA**

Dear Filing Center:

Enclosed for filing in the above-referenced docket please find Portland General Electric Company's ("PGE") Reply Brief.

Please advise if there is difficulty in opening the attached PGE Answer or if there are questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barbara Halle", is written over a light blue horizontal line.

Barbara Halle  
Associate General Counsel

BWH: rds

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1811**

**In the Matter of**

**PORTLAND GENERAL ELECTRIC  
COMPANY,**

**Application for Transportation  
Electrification Programs.**

**REPLY BRIEF OF PORTLAND  
GENERAL ELECTRIC COMPANY**

**INTRODUCTION**

PGE files its Reply Brief in this docket to address some of the arguments made by ChargePoint, Inc. (“ChargePoint”) and the Electric Vehicle Charging Association (“EVCA”) in their Post-Hearing Response Briefs that urge the Commission to reject one of the programs filed for approval as part of the Stipulation agreed to and supported by multiple parties in this docket. Neither ChargePoint nor EVCA has introduced any arguments that the Commission should find persuasive in its consideration of whether to approve the Stipulation as filed. However, as PGE will address at the end of this Brief, the issue of whether EVCA and others besides the Stipulating Parties (as such term is defined in PGE’s Opening Brief) should be allowed to participate in future discussions and considerations of how best to accelerate transportation electrification in Oregon deserves specific attention.

**DISCUSSION**

**I. CHARGEPOINT MISCONSTRUES LEGISLATIVE HISTORY AND ATTEMPTS TO MISLEAD THE COMMISSION ABOUT WHAT THEY MUST DO TO FULFILL THEIR OBLIGATIONS UNDER SB 1547.**

PGE in the Joint Opening Brief it filed with CUB, Greenlots and Forth (hereinafter the “Joint Parties’ Opening Brief”), and the PUC Staff, in its Opening Brief, have already addressed the arguments that ChargePoint has made that the language in the statute requires any program proposed by an electric company to meet all six of the criteria listed in subsection (4)(a) through (e) in order to be approved by the Commission. ChargePoint cannot and has not added anything more persuasive in their Response Brief because the language in the statute is plain. As we stated in our Opening Brief,

In the text of subsection 4 of the law, the Legislature listed 6 criteria that the Commission “shall consider” when evaluating transformation electrification programs and determining cost recovery for the investments and expenditures related to the programs. The words “shall consider” should be given their plain meaning. In ordinary usage, the word “consider” means “to think carefully about (something)” or “to take into account; bear in mind.” The American Heritage Dictionary of the English Language, (5<sup>th</sup> Ed., 2016). **The Legislature did not say “shall only consider” or “shall apply the following list of criteria” or focus on any one of these criteria over the others.** In accordance with ORS 174.010, the Commission may not read into the statute words that the Legislature did not choose to insert.<sup>1</sup> Therefore, despite ChargePoint’s attempt to assert to the contrary, the Commission is not required by the statute to make sure that all of the pilot programs that the Stipulation be approved meet all six of the criteria in subsection 4(a) – (f) of the statute.

ChargePoint’s statements such as “the Legislative Assembly directed the Commission to approve such a proposal only if it found...”<sup>2</sup> and “[u]tility ownership is not prohibited by SB

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<sup>1</sup> ORS 174.010 states, in pertinent part “In the construction of a statute, the office of the judge is simply to ascertain and declare what is, in terms or in substance, contained therein, not to insert what has been omitted, or to omit what has been inserted ...” (Emphasis added.)

<sup>2</sup> ChargePoint Post Hearing Reply Brief at 2.

1547, but is allowed only if the program meets SB 1547’s criteria...”<sup>3</sup> and “[t]he Legislative Assembly would not have specified the six criteria if it did not believe it was reasonable to expect a utility to meet each of them”<sup>4</sup> and “PGE must stimulate customer choice in charging station infrastructure and services in order to comply with SB 1547”<sup>5</sup> are simply conclusions that are not supported by the plain language of the statute, and add unwarranted and unsupported restrictions on the Commissions’ authority under SB 1547 and its own enabling statutes.<sup>6</sup>

Moreover, the Stipulating Parties have not asked and are not asking the Commission to ignore any of the factors listed in Section (4). All of these factors are addressed for Commission’s consideration in the Opening Briefs<sup>7</sup>. Should the Commission consider a factor but give it less weight than others due to the Commission’s overall assessment that the program meets the statutory intent, this does not mean that the factor was ignored.

Finally, the Commission’s role includes both supporting the acceleration of transportation electrification and the protection of Oregon customer interests.<sup>8</sup> While the Legislature included the stimulation of innovation, competition and customer choice in electric vehicle charging and related infrastructure and services among the factors the Commission should consider, ChargePoint’s continued emphasis on those factors frankly may just be in furtherance of its own economic agenda, not the stated Legislative goal of widespread transportation electrification<sup>9</sup>. The Commission should also balance the factors to be considered in Section 20(4) with the other language of Section 20 to aid its decision making process here. For the reasons stated in PGE’s application, the Stipulation and the Joint Parties’ Opening Brief, the pilot programs are a

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<sup>3</sup> ChargePoint Post Hearing Reply Brief at 12.

<sup>4</sup> Id. at 25.

<sup>5</sup> Id. at 33.

<sup>6</sup> For further discussion, see the Joint Parties’ Opening Brief, pp. 10-13.

<sup>7</sup> Joint Parties’ Opening Brief, pp. 5-8 and 14-15; PUC Staff’s Opening Brief, pp. 14-17.

<sup>8</sup> Joint Parties’ Opening Brief at pp. 10-13.

<sup>9</sup> SB 1547 §20(2)(a)-(d).

reasonable way to help move forward on the Legislative goals at a modest cost to PGE customers.

**II. CHARGEPOINT CONTINUES TO OVERSTATE THE LIKELY EFFECT OF PGE'S ELECTRIC AVENUE PILOT PROGRAM AND SHOULD BE STRAIGHTFORWARD ABOUT THEIR INTERESTS IN THE OREGON MARKET.**

Both ChargePoint and EVCA continue to assert that PGE's Electric Avenue pilot will lead to the dampening or thwarting of competition and PGE's dominance of the charging station market.<sup>10</sup> As we stated in our Joint Parties' Opening Brief<sup>11</sup>, the numbers do not support such an overstated and far-fetched conclusion, and the Commission should not be persuaded by such exaggerated and unsupported statements.<sup>12</sup>

PGE included information in its March updated Application concerning the state of the electric charging market based on available information at that time. There were 104 sites and 182 DCQC charging stations that were publicly available. Increasing PGE's participation by 6 additional charging sites and 30 additional charging stations still leaves PGE with a very small share of the total market, which is growing by bigger every day.<sup>13</sup> Despite ChargePoint's and EVCA's expressed concerns about market dominance by PGE, players in the market for charging infrastructure appear undaunted by PGE's proposed Electric Avenue pilot program.<sup>14</sup>

ChargePoint posits a situation where competitive EVSE providers are unable to compete because a potential site-host would be reluctant to install charging equipment at its site with a

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<sup>10</sup> ChargePoint's Post Hearing Response Brief at 3; EVCA's Response Brief at 4.

<sup>11</sup> Joint Parties' Opening Brief at 15.

<sup>12</sup> In ChargePoint's responses to PGE's and Staff's Data Requests on September 18, 2017, ChargePoint consistently refused to provide any evidentiary support for these statements, citing only that its witness, David Packard's, statement is "based on his 19 years of experience in the EV charging industry."

<sup>13</sup> See Tesla announcement of Supercharger expansion: <https://www.tesla.com/findus#/bounds/46.299099,-116.463262,41.9917941,-124.7035411?search=supercharger&name=Oregon>) and Electrify America Investment Plan: <https://www.electrifyamerica.com/downloads/get/38726>)

<sup>14</sup> Joint Testimony in Support of Stipulation at 16-17; Forth/200, Allen-Shaw/5; Siemens/100, King/7-8.

PGE charger “down the street”<sup>15</sup>, but the likelihood of that situation even arising with up to six charging stations in PGE’s approximately 4,000 square mile service territory<sup>16</sup> is tiny indeed.

PGE has been clear from the beginning that it does not intend to dominate the EV or EV charging marketplaces<sup>17</sup>. We believe there are many valuable players needed to create a vibrant and prosperous market, and we see our legislative mandate to help accelerate adoption and to ensure that our system is adequately prepared to realize value for all customers. The prospective grid impacts have consequences with the electric company first, so it is paramount to the successful and effective growth of the EV market that PGE be involved in the early stages in understanding charging behaviors, distribution siting considerations, ancillary benefits, cost-effectiveness, and customer impacts of electric vehicle technologies. The pilot programs as a whole allow us to take reasonable steps to achieve these understandings.

**III. CHARGEPOINT’S FOCUS ON “INNOVATION”, LIKE THEIR FOCUS ON “CUSTOMERS”, IS TOO NARROW AND DOES NOT TAKE INTO ACCOUNT ALL OF THE WAYS THAT THESE PILOT PROGRAMS COULD REASONABLY LEAD TO INNOVATION IN THE EV MARKET, OR STIMULATE “CUSTOMER CHOICE”.**

ChargePoint is trying to convince the Commission that innovation in charging equipment and infrastructure would occur only if the EVSE providers are motivated by the sale of infrastructure to site hosts. This is too narrow a view of how innovation could occur, and the Commission should not be limited in their thinking to this model. Participants in this docket have stated in numerous places that innovation in charging is likely to be spurred by an increase

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<sup>15</sup> ChargePoint’s Post Hearing Response Brief at 10.

<sup>16</sup> PGE’s most recent Quarterly Report on Form 10-Q, filed with the Securities and Exchange Commission on October 27, 2017 at 9.

<sup>17</sup> Application.

in the number of electric vehicles in Oregon that need to be charged.<sup>18</sup> More EVs on the road will increase demand for electric vehicle chargers and charging-related services. Ultimately a larger customer base will create a larger incentive for EVSE providers to create innovative products and solutions for the growing market.<sup>19</sup>

In addition, innovation in the development of electric vehicle charging and related infrastructure and services should not and will not be limited to the choices that are presented to site hosts that appear to be ChargePoint's target market. Charging will occur in residential single family and multi-family dwellings, in workplaces, in public settings and in private settings. Users will potentially include different electric vehicle types, transit vehicles and shared mobility.<sup>20</sup> It is reasonable to expect that the more need there is for charging infrastructure to serve these various settings and users, the more the market will respond to with innovative solutions to meet the needs of all of them.

With respect to the Electric Avenue pilot program in particular, as indicated by the National Resources Defense Council, "Utility-scale investment is also needed to facilitate the expansion of the nascent competitive EV charging service industry."<sup>21</sup> A competitive RFP inherently drives competition and supports growth of the industry as the bidders compete to achieve the successful proposal. RFPs therefore create opportunities for businesses to innovate, find ways to make products cheaper, and highlight new products/features. Price is not the only objective.<sup>22</sup>

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<sup>18</sup> Siemens Exhibit 100 at 3; Forth Exhibit 200 at 5.

<sup>19</sup> Joint Testimony in Support of Stipulation at 11.

<sup>20</sup> Forth Exhibit 200 at 4.

<sup>21</sup> Baumhefner, Hwang, Bull. NRDC. Driving Out Pollution: How Utilities Can Accelerate the Market for Electric Vehicles (2016).

<sup>22</sup> Testimony of Jacob Goodspeed, Transcript at 68-69 and 71-72; Joint Testimony in Support of Stipulation at 11.

Finally, the Electric Avenue model of co-locating several DCQCs each capable of providing a charge to nearly all EVs has not been broadly deployed, despite being the same basic approach as gasoline filling stations.<sup>23</sup> This approach is and of itself is innovative (and has already been deployed by Tesla), and PGE believes it has the potential to demonstrate greater stimulus to the electric vehicle market than other approaches to public charging have yet to show.

With regard to the concept of customer choice, likewise ChargePoint's approach is unnecessarily narrow.<sup>24</sup> Customer choice is more than just a customer choosing to purchase and/or install a certain type of charger. It includes choosing an electric car over gas and then choosing which electric car to purchase, not dependent on the limitations of available charging infrastructure.<sup>25</sup> It includes where and when to charge a vehicle. Further, such choice is not limited to personal vehicles purchased on the mass market, but also includes fleet managers, transit agencies, car share companies, Uber/Lyft drivers, etc. Seen with this perspective, the idea that PGE's selecting what brand of charger to ultimately install at any of the up to six additional charging station sites negates customer choice loses credibility, and should be rejected by the Commission.

**IV. THERE ARE GOOD REASONS WHY THE UTILITY OWNERSHIP MODEL IS THE ONE THAT HAS BEEN CHOSEN FOR PGE'S INITIAL EFFORTS UNDER THE STATUTE RATHER THAN THE REBATE AND MAKE-READY MODELS ON WHICH CHARGEPOINT IS FOCUSED.**

There are a number of very good reasons why PGE chose to own the chargers in the Electric Avenue pilot program. These include the following:

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<sup>23</sup> Joint Testimony in Support of Stipulation at 12.

<sup>24</sup> ChargePoint Post Hearing Reply Brief at 4 ("SB 1547's requirement that TE programs "stimulate ... customer choice," refers to electric vehicle service equipment (EVSE) site-hosts...")

<sup>25</sup> Testimony of Aaron Milano, Transcript p. 32.



1. PGE's experience with the first chargers in Oregon showed us the consequences when a party that is having financial difficulties is responsible for the operation and maintenance of the charging stations.<sup>26</sup> In order for customers to trust that electric vehicles will be running when they need them, it is crucial that someone is reliably responsible to make sure that chargers are operational as much as possible, and this includes making sure they get regular maintenance. On the small scale of this pilot program, these are goals that PGE is well equipped to meet, and has recent direct experience to inform its efforts.
2. The learnings from this pilot program will give PGE access to both charger-specific and customer-specific usage data. These include such important data points as how often and when the chargers are used, suggest how the location of the chargers might support particular usage patterns, which cars tend to use what types of chargers, and the like. If the electric company owns the chargers, it can design the RFP to include particular data-gathering capabilities.<sup>27</sup>
3. The electric company can offset the pilot program costs with revenues from the chargers, which means that the ultimate cost to customers who do not drive electric vehicles will be less. There is no assurance that make ready and rebate offers to site owners will ever result in any monetary benefit to the electric vehicle drivers who are users of the charging stations.
4. If the electric company owns the chargers, it can establish (with Commission approval) and test different customer rates, thus gathering useful information about end-user price signals that can inform future participants in the EV charging infrastructure market.
5. If the electric company owns the charging stations, it will have more control over the location of the sites, and therefore can better meet the statutory mandate to "increase

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<sup>26</sup> Id. at 64

<sup>27</sup> ChargePoint criticizes PGE for not collecting data from the existing Electric Avenue location at the World Trade Center building in Portland and uses this as yet another reason why the Commission should disallow the Electric Avenue pilot program in the Stipulation. There are a number of reasons why the sort of data that PGE and the other Stipulating Parties are hoping to gain with this pilot was not available at the existing location. One reason is that until very recently PGE was not permitted to collect fees for the charging function itself; any data would have been severely distorted by that fact. The negotiations for a franchise with the City of Portland, which took over two years, also constrained PGE's ability to design and use the installation to gather the types of data desired by the Stipulating Parties. The Electric Avenue pilot program at issue in this docket is specifically designed to do that. Any data that PGE is able to gather from the World Trade Center site going forward, to the extent it is useful, will also be shared along with our Electric Avenue pilot learnings.

access to the use of electricity as a transportation fuel in low and moderate income communities” by siting the charging stations in areas where the private market might not choose to put them.

6. The legal complexities of negotiating easements and site agreements to ensure that the learnings the Stipulating Parties are seeking can be achieved could take many months to work out, and success is not a given. Ownership of the chargers and control of the considerations in the RFP process can simplify or eliminate some of these hurdles.

Nonetheless, the Stipulating Parties considered, and agreed on, an alternative program to be offered in the future involving rebates. The Stipulation states that the residential home charging pilot will include rebates for customers installing a connected level 2 charger and going on a time-of-use rate schedule within one year of Commission approval of PGE’s transportation electrification program application<sup>28</sup>. With the residential home charging pilot, utility ownership is not desirable or practical, but the rebates will help both to incent electric vehicle purchases, and to incent residential EV owners (who are utility customers) to charge their vehicles during off-peak times to benefit the electric system. This also will help the program application meet the criteria contemplated in SB 1547 § 20(2)(d)-(e). None of these benefits are available with the rebate programs that ChargePoint urges the Commission to substitute for PGE’s Electric Avenue pilot. Further, the reference in Section 20(3) to “customer rebates” does not have to be limited to rebates to host site owners, since the Stipulating Parties believe the appropriate definition of “customer” in the legislation is much broader.<sup>29</sup>

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<sup>28</sup> Stipulation, paragraph 30 at 7.

<sup>29</sup> Joint Parties’ Opening Brief at 14; Testimony of Aaron Milano, Transcript, p. 30.

One additional point we should clarify for the record concerns ChargePoint's claim that a make ready program could adequately address credits from the Clean Fuels Program.<sup>30</sup> ChargePoint either misunderstands or misstates how this program is expected to work. Docket UM 1826 which is addressing the use of the CFP credits, is still open before the Commission. Staff's recent report in that docket suggests that an owner of a non-residential charger will get the credits for that charger and may monetize them, but where utilities are concerned, the use of CFP credits will be addressed through approval of programs under Section 20 of SB 1547.<sup>31</sup> As part of the Stipulation, PGE will monetize any credits it receives as a credit generator from the Electric Avenue pilot to offset the costs of the additional charging stations<sup>32</sup>. There is no "aggregating" where non-residential chargers are concerned. ChargePoint's and EVCA's suggested models of rebates and make ready programs simply do not permit the utility to require application of the credits to a pilot program for the benefit of customers, nor would a non-residential site host have a meaningful incentive to do so.

ChargePoint argues that the Stipulating Parties have not proved that utility ownership is "necessary", but that is not the statutory standard that the Commission has been directed by the Legislature to apply. The Commission does not have to determine that the Electric Avenue pilot, as designed, is the only way PGE could gather the data, or achieve the other learnings the Stipulating Parties have identified. The question to be answered is whether it is a reasonable way to get to the statutory goals given the considerations that the Legislature laid out, and the Commission has the discretion to see these programs as reasonable steps to get there.

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<sup>30</sup> ChargePoint Post Hearing Reply Brief at 29 ("PGE could use contracting to require participating site-hosts and/or participating EVSE vendors to aggregate CFP credits and use the value of those credits to offset the cost of the rebates or make-ready.")

<sup>31</sup> Staff Report, filed 11/21/17 at 7, fn. 9

<sup>32</sup> Stipulation, paragraph 28 at 7.

V. **PILOT PROGRAMS DO NOT HAVE TO BE MINI VERSIONS OF PROGRAMS THAT ARE EXPECTED TO BE PURSUED IN THE FUTURE.**

ChargePoint's witness states that "the purpose of a pilot program is typically to test a new program design that holds promise as a potential new utility offering."<sup>33</sup> Here again, ChargePoint's and EVCA's<sup>34</sup> view of utility pilot programs is too narrow. Examples of pilot programs filed with the Commission that were attempts at gathering learning that would inform later utility actions (or decisions not to act) include the Oregon Electric Vehicle Highway Pilot Rider (Rate Schedule 344) and the Salem Smart Power Project (UM 1460).

As the PUC Staff said in its Opening Brief, pilot programs can be used to "gather data, learnings and to gauge customer interest."<sup>35</sup> When trying out a mix of ideas as we are doing here with the group of pilot programs presented for Commission approval in the Stipulation, the Stipulating Parties believe it is reasonable to expect they can lead to diverse learnings and perhaps even better ideas for utility participation in the transportation electrification arena in the future.<sup>36</sup>

VI. **THE PURPOSE OF THE STATUTE IS TO KICK START THE MARKET FOR ELECTRIC VEHICLES IN OREGON, NOT TO BOLSTER OR PROTECT THE MARKET FOR CHARGING INFRASTRUCTURE**

ChargePoint wants the Commission to accept the assertion that the Legislature intended through SB 1547 to protect "the competitive EV Charging marketplace in Oregon".<sup>37</sup> The Commission should resist accepting ChargePoint's non-legislator witness' assertion of

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<sup>33</sup> ChargePoint Post Hearing Reply Brief at 19.

<sup>34</sup> EVCA's Response Brief at 10.

<sup>35</sup> PUC Staff Opening Brief at 13; see also: Staff/100, Klotz/39, lines 7-9 ("We conduct pilots to learn about program framework, operation, market acceptance, and to acquire data on these and other points.").

<sup>36</sup> Joint Parties' Opening Brief at 18-19.

<sup>37</sup> ChargePoint Post Hearing Reply Brief at 13.

legislative history that is not reflected in the statutory language. Instead, the Commission should review the Stipulation and the pilot programs in light of the full expression of the Legislature's intent contained in the final plain language of the statute. As discussed in Section I, above, that intent is to foster widespread transportation electrification in order to meet the goals described in Section 20(2)(a). The pilot programs proposed for approval in the Stipulation are likely to provide a useful set of learnings for all interested parties to ponder, while their modest size and cost will not disrupt, but instead support, the developing market for electric vehicles and charging infrastructure. The Commission should approve the Stipulation as filed.

VII. **PGE LOOKS FORWARD TO THE PARTICIPATION OF INTERESTED PARTIES LIKE EVCA IN THE DISCUSSIONS ABOUT TRANSPORTATION ELECTRIFICATION PROGRAMS AND EVALUATIONS OF THE PILOTS GOING FORWARD.**

In the hearing in this docket on October 10, EVCA concentrated much of its questioning of witnesses on whether or not EVCA would be permitted to join in the process of developing PGE's transportation electrification programs.<sup>38</sup> Likewise, this was a focus of EVCA's Response Brief filed on November 17<sup>39</sup>.

PGE agrees with Staff and CUB, as articulated in their Reply Briefs filed today, that shared ideas and experiences going forward are likely to lead to better outcomes for the programs and for transportation electrification efforts on the whole. PGE believes the stakeholder workshops it conducted at the beginning of the TE process to allow stakeholders opportunity to provide input on its ideas and thinking improved PGE's proposals. Informing PGE's proposals with a diverse mix of views from customers, industry stakeholders, and other organizations all contribute to a more robust offering for PGE's customers.

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<sup>38</sup> See, e.g., Questions of PGE witnesses by EVCA attorney Irion Sanger, Transcript at 42-49

<sup>39</sup> EVCA Response Brief, pp. 13-18.

PGE supports the Commission inviting EVCA to participate in future meetings and proceedings concerning these pilot programs and other related programs that PGE may file for approval with the Commission, with the exception of the discussions and meetings between the Stipulating Parties to finalize the learnings we are seeking from these pilot programs, for the same reasons already articulated by Staff and CUB in their Reply Briefs.

**VIII. ANY QUESTION REGARDING THE PRECEDENTIAL EFFECT OF APPROVAL OF THESE PILOT PROGRAMS HAS ALREADY BEEN ADDRESSED BY THE STIPULATING PARTIES.**

Since EVCA's Response Brief continues to raise this issue, PGE repeats the assertions it made in the Joint Parties' Opening Brief that it has agreed that no provision of the Stipulation is appropriate for resolving issues in any other proceeding.

**CONCLUSION**

The Legislature expressed a clear intent in SB 1547 that transportation electrification should be accelerated in Oregon in order to achieve a variety of state goals related to carbon reduction, and that electric companies like PGE and the Commission have an important role to play in achieving that result. As we have stated in previous filings, PGE and the other Stipulating Parties believe that it is reasonable to expect that the pilot programs described in the Stipulation will help us gather learnings that will provide useful information, help electric companies, stakeholders, the Commission and customers make better informed decisions in the future, and allow Oregon to make meaningful progress in increasing transportation electrification.

PGE's program application furthers the goals of SB 1547 for a modest cost, over a defined period of time, and with specific limits on cost exposure to customers. For the reasons described in the briefs filed by the Stipulating Parties, as well as their testimony in this docket, PGE, Commission Staff, Oregon Citizens' Utility Board, Industrial Consumers of Northwest Utilities, Oregon Department of Energy, Tesla, Forth, TriMet, and Greenlots have requested that the Commission approve the Stipulation reached by the Stipulating Parties, and PGE reiterates that request for approval through this Reply Brief.

DATED this 30<sup>th</sup> day of November 2017.

Respectfully submitted,



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Associate General Counsel for  
Portland General Electric Company