

May 11, 2017

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Attn: Filing Center

**RE: Advice 16-020/ADV 485 – Schedule 45 – Public DC Fast Charger Delivery Service  
Optional Transitional Rate – Response to ChargePoint Comments on Supplemental  
Filing**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) appreciates the opportunity to provide comments responsive to ChargePoint's supplementary comments on proposed Schedule 45 submitted May 4, 2017. PacifiCorp views ChargePoint as a leader in the electric vehicle charging industry familiar with charging stations, charging station rates and electric vehicle users and appreciates ChargePoint's two recommendations. First, ChargePoint recommends a discount structure based on each station's utilization (load factor) rather than the time-based glide path that would be scaled down on an annual basis as PacifiCorp proposed in its supplemental filing. Second, ChargePoint recommends no limit on the number of participating customers on the proposed tariff. PacifiCorp understands the concerns raised by ChargePoint's recommendations, however, the Company urges the Commission to reject ChargePoint's recommendations at this time and adopt Schedule 45 as proposed by the Company in its supplemental filing.

With regard to ChargePoint's first recommendation to base the discount structure on utilization rates, the Company recognizes that if the growth of electric vehicles is slow, the proposed nine year straight-line glide path could result in some charging stations seeing increases to demand charges while station utilization is still low. In its initial proposal, the Company did not specify a glide path to return Schedule 45 customers to standard rates, but instead proposed to evaluate through a triennial review process the progress of charging station utilization and the best path forward toward standard rates based on that progress. Even with the proposed glide path to standard rates, the Company proposes annual reviews of customer usage and, on a triennial basis, review of the tariff. Overall load factor for the rate schedule, individual customer load factor, and the effect of increasing demand charges on customer bills will be reviewed through both the annual and triennial process and the Company may recommend adjustments to the glide path in the tariff based on the findings. In addition, PacifiCorp's billing system is not currently capable of billing a customer based on the customer's individual load factor as proposed by ChargePoint.

ChargePoint's second recommendation is to remove the limit of 200 participating customers from the tariff. The limit was set in the supplemental filing based on discussions with

Commission staff. The estimated number of current customers eligible for the proposed schedule is 13. The limit of 200, although not based on a specific calculation, was intended to allow a reasonably large number of new stations to take service under the schedule while still limiting the exposure of other customers to potential cost shifting in the future. As the Company stated in the supplemental advice letter, PacifiCorp may, at any time, recommend changes to any aspect of this tariff including the rates, the transition period, and the participation limit. An evaluation of the rate schedule participation level will be included in the annual and triennial reports to the Commission and PacifiCorp may propose to expand the limit, if so warranted.

During this pivotal period of industry development, the Company hopes its proposed tariff will accelerate the installation of a robust charging network that will allow plug-in electric vehicle drivers to travel long distances without the fear of being stranded and unable to quickly recharge. The supplemental proposed filing attempts to balance this goal, driven by the provisions of Senate Bill 1547, with the regulatory concerns of appropriate price signals, better certainty in rates, transparency of the discount being applied, and potential cost shifting to other customers.

Informal inquiries may be directed to Natasha Siores at (503) 813-6583.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. Bryce Dalley", with a long horizontal flourish extending to the right.

R. Bryce Dalley  
Vice President, Regulation