



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

November 22, 2019

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 1826: PGE 2020 Clean Fuels Program Plan

Portland General Electric Company (PGE) submits this filing pursuant to Public Utility Commission of Oregon (Commission) Order No. 18-376 in Docket No. UM 1826.

In October 2018, the Commission issued Order No. 18-376 providing broad guidance on how utilities should spend Clean Fuel Program funds and establishing a process for utilities to develop and file the 2020 Clean Fuels Program Plan.

For the 2020 program year, following consultation with stakeholders, PGE plans a portfolio of four programs (the Portfolio):

- **Drive Change Fund:** PGE will continue its competitive grant fund to support non-residential customers in a variety of project types to advance transportation electrification to the benefit of residential customers;
- **Public Outreach Activities:** PGE will continue to invest in outreach to the public to promote electric vehicle adoption and awareness of electric mobility options;
- **Smart Charging Pilot:** PGE will leverage a vehicle telematics tool in Smart Grid Test Bed locations to understand EV driver habits; and
- **Direct Current Fast Charging Site Upgrades:** PGE will set aside a sum of funds to be deployed quickly to support customers in upgrading sites that have outdated DC fast charging equipment throughout the state.

Included in this filing, as Exhibit A, is PGE's 2020 Clean Fuels Program Plan which provides more details on the planned programs. Appendix A, of Exhibit A, provides PGE's Portfolio budget.

Should you have any questions or comments regarding this filing, please contact Stefan Cristea at (503) 464-8033.

Please direct your communications related to this filing to the following email address:
pge.opuc.filings@pge.com

Sincerely,

A handwritten signature in black ink, appearing to read "Karla Wenzel", is written over a light blue horizontal line.

Karla Wenzel
Manager, Regulatory Strategy and Initiatives

Enclosures
cc: Service List – UM 1826

PGE Clean Fuels Program Plan

Program Year 2020 | UM 1826 | November 2019



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Executive Summary

Portland General Electric (PGE) is pleased to file this Clean Fuels Program (CFP or Program) plan, as directed by the Public Utility Commission of Oregon (OPUC or Commission).

In October 2018, the OPUC issued Order No. 18-376 providing broad guidance on how utilities should spend CFP funds. The Order also included a directive to investor-owned utilities to propose plans in the fall of each year for the following year’s programs, and to present and discuss these plans with stakeholders at a series of two workshops with the goal of achieving stakeholder consensus on the programs.

For the 2020 program year, following consultation with stakeholders, PGE plans a portfolio of 4 programs (the Portfolio):

- The Drive Change Fund;
- Public Outreach Activities;
- A Smart Charging Pilot; and
- Direct Current (DC) Fast Charging Site Upgrades.

Details on each of the four programs are provided in Section 3, Planned Portfolio. As detailed in Table 1 below, the estimated cost of the Portfolio is \$5,239,000.

Table 1 Planned Portfolio Overview

Portfolio Budget	Cost
Drive Change Fund ¹	\$ 2,597,000
Public Outreach Activities	\$ 1,300,000
Smart Charging Pilot ²	\$ 420,000
DC Fast Charging Site Upgrades	\$ 768,000
Portfolio Administration	\$ 136,000
Total Costs	\$ 5,239,000

PGE is pleased to present this Portfolio of programs that meets the Program Design Principles outlined by the Commission, and that was well-received by stakeholders. With this Portfolio, PGE aims to advance transportation electrification (TE) by tackling multiple barriers to adoption across a broad spectrum of vehicle types and customer classes.

¹ And at least \$2,000,000 in each of 2021 and 2022

² And \$320,000 in each of 2021 and 2022

Section 1 Background

In 2009, the Oregon Legislature passed House Bill (HB) 2186, authorizing the Oregon Environmental Quality Commission to adopt rules to reduce the average carbon intensity of Oregon's transportation fuels by 10 percent over a 10-year period.³ In 2015, the Oregon Legislature passed Senate Bill (SB) 324 allowing the Oregon Department of Environmental Quality (DEQ) to fully implement the Clean Fuels Program beginning in 2016.⁴

The CFP established clean fuel standards, an annual average carbon intensity that a regulated party must comply with. There is a standard for gasoline and gasoline substitutes and one for diesel and diesel substitutes. The baseline year for the program is 2015, and the rule requires a 10 percent reduction in average carbon intensity from 2015 levels by 2025.⁵

Deficits are generated when the carbon intensity of a specific fuel exceeds the clean fuel standard in a given year (such as gasoline or diesel), and regulated parties must obtain credits to satisfy their deficits. Credits are generated when the carbon intensity of a specific fuel is lower than the clean fuel standard in a given year (such as electricity).

The DEQ rules implementing the Program⁶ identified electric utilities as the first-choice aggregator for all residentially-charged EVs registered in the utility's service territory. In July 2017, the OPUC deemed that it is in the public interest that electric utilities aggregate and generate CFP credits on behalf of residential customers who drive EVs, and required PGE and PacifiCorp to register with the DEQ as generators and aggregators of CFP credits under the Program.⁷

In October 2018, the OPUC issued Order No. 18-376 providing broad guidance on how utilities should spend CFP funds, including establishing an expedited filing schedule for the first program year (2019).⁸

The Program Design Principles established by the OPUC are:⁹

1. Support the goal of electrifying Oregon's transportation sectors;
2. Provide majority of benefits to residential customers;
3. Provide benefits to traditionally underserved communities;
4. Programs are designed to be independent from ratepayer support;
5. Programs are developed collaboratively and transparently; and
6. Maximize use of funds for implementation of programs.

³ 75th Oregon Legislative Assembly, 2009 Regular Session. Chapter 724, 2009 *Oregon Laws*. Retrieved from https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2009orLaw0754.html

⁴ 78th Oregon Legislative Assembly, 2015 Regular Session. Chapter 4, 2015 *Oregon Laws*. Retrieved from https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2015orLaw0004.pdf

⁵ Oregon Department of Environmental Quality. *Overview of the Clean Fuels Program*. Retrieved from <https://www.oregon.gov/deq/FilterDocs/cfpoverview.pdf>

⁶ Oregon Administrative Rules. Ch. 340 Div. 253. Retrieved from <https://secure.sos.state.or.us/oard/view.action?ruleNumber=340-253-0330>

⁷ OPUC (2017). *Order No. 17-250 Public Utility Commission of Oregon Investigation into Utility Participation in Oregon Clean Fuel Programs*. Retrieved from <https://apps.puc.state.or.us/orders/2017ords/17-250.pdf>

⁸ OPUC (2018). *Order No. 18-376 Public Utility Commission of Oregon Revised Principals and Process for Utility Use of Revenue from Clean Fuels Program*. Retrieved from <https://apps.puc.state.or.us/orders/2018ords/18-376.pdf>

⁹ Importantly, these residential credits are distinct from credits PGE generates when an EV driver charges at a charging station owned by PGE. Credits generated at PGE's owned charging stations are not regulated under Order Nos. 17-250 and 18-376, so do not contribute to the funding of the programs outlined in this Plan.

In the Staff memo adopted by the Commission in Order No. 18-376, Staff suggested that administrative costs should be targeted at or below 10 percent of total program costs in a program year, with reasonable variation by program.

Lastly, through Order No. 18-376, the Commission established a cadence of stakeholder engagement for program design beginning in the fall of 2019. Per this guidance, PGE sent a draft of its 2020 Clean Fuels Program plan to stakeholders to the Docket No. UM 1826 service list on September 13, 2019. Stakeholder workshops were held on September 25, 2019 and October 23, 2019. PGE also fielded written feedback from some stakeholders during the engagement period. Feedback from stakeholders has been integrated into this plan and the program designs.

Section 2 Credit Activity

In 2019 PGE received 34,526 CFP credits for customers' residential charging activity in 2018. As of November 1, 2019, the company has sold 25,000 of these credits, and plans to sell the remaining credits in time to fund 2020 programs. Between monetized proceeds, forecasted proceeds, and unallocated carryover from the prior year, PGE anticipates around \$5,500,000 in funding for 2020 programs.

Per Order No. 17-250, PGE will separately file a credit monetization report in 2020 that includes more details about individual credit sales.

Section 3 Planned Portfolio

For the 2020 program year, following consultation with stakeholders, PGE plans a portfolio of four programs:

- **Drive Change Fund:** PGE will continue its competitive grant fund to support non-residential customers in a variety of project types to advance transportation electrification to the benefit of residential customers;
- **Public Outreach Activities:** PGE will continue to invest in outreach to the public to promote electric vehicle adoption and awareness of electric mobility options;
- **Smart Charging Pilot:** PGE will leverage a vehicle telematics tool in Smart Grid Test Bed locations to understand EV driver habits; and
- **Direct Current (DC) Fast Charging Site Upgrades:** PGE will set aside a sum of funds to be deployed quickly to support customers in upgrading sites with outdated DC fast charging equipment throughout the state.

As detailed in Table 2 below, the budget for the 2020 Portfolio is an estimated \$5,239,000. Administrative costs represent 9% of the budget, meeting the administrative cost target of "at or below 10%" established in Order No. 18-376.¹⁰ Two programs—the Drive Change Fund and the Smart Charging Pilot—will be operated as 3-year programs, and PGE will earmark additional funding from the 2021 and 2022 Clean Fuels Program Plan budgets to support the continuation of these programs.

¹⁰ OPUC (2018). *Order No. 18-376 Public Utility Commission of Oregon Revised Principals and Process for Utility Use of Revenue from Clean Fuels Program*. Retrieved from <https://apps.puc.state.or.us/orders/2018ords/18-376.pdf>

Table 2 Planned 2020 Portfolio Budget

Portfolio Budget	Program Costs	Admin Costs	Total
Drive Change Fund ¹¹	\$ 2,375,000	\$ 222,000	\$ 2,597,000
Public Outreach Activities	\$ 1,300,000	\$ -	\$ 1,300,000
Smart Charging Pilot ¹²	\$ 365,000	\$ 55,000	\$ 420,000
DC Fast Charging Site Upgrades	\$ 750,000	\$ 36,000	\$ 786,000
Portfolio Administration	\$ -	\$ 136,000	\$ 136,000
Total Costs	\$ 4,790,000	\$ 449,000	\$ 5,239,000
<i>Administrative Costs</i>			9%

The Portfolio is designed to meet the Program Design Principles outlined by the OPUC and address barriers to transportation electrification in multiple sectors, and at multiple points in the value chain. Feedback from stakeholders has been integrated into the design of the Portfolio.

3.1 Drive Change Fund

3.1.1 Background

Despite significant advancements in transportation electrification in recent years, individual ownership of an electric vehicle remains logistically and/or financially out of reach for many residential utility customers.¹³ Meanwhile, other mobility and planning trends such as car- and ride-sharing, transit, shuttles, autonomous vehicles, multi-modal solutions, micromobility¹⁴, and car-free cities or streets also offer ways to increase equity in the transportation electrification space by reaching beyond private vehicle ownership. PGE plans to continue its competitive grant fund for non-residential customers to support projects that advance transportation electrification and provide a benefit to residential customers. Emphasis will continue to be placed on projects that meet the needs of underserved communities.

3.1.2 Program Description

In launching the Drive Change Fund in 2019, PGE discovered substantial interest in EVs among governments and nonprofit organizations that serve the public. While PGE is still processing and evaluating applications from the first round of grant applications, the quantity of applications and amount of total funding requested indicate significant demand for this type of funding. Many applicants took advantage of financial and technical assistance funded by PGE, as well. Overall, this level of interest speaks to the ongoing need for investment to support customers in their transition to electric transportation technology, as well as a robust program design—with layers of financial and technical support—to ensure that all types of organizations are equitably equipped to make this transition successfully.

¹¹ And at least \$2,000,000 in each of 2021 and 2022

¹² And \$320,000 in each of 2021 and 2022

¹³ Market Strategies International (2018). *Portland General Electric 2018 Electric Vehicle Study Among Residential Customers*.

¹⁴ Micromobility represents emerging technologies for solving unique transportation needs, including but not limited to: shared scooters, shared bikes, and other shared vehicles that enhance mobility.

From 2020 through 2022, PGE plans to continue the following program design elements from the 2019 Drive Change Fund, drawing on the Program Design Principles and guidance from the Trust-Based Philanthropy Project¹⁵, as applicable within the parameters of the Program Design Principles:

- **Applicant Eligibility:**
 - Applicants may be nonprofit, for-profit or government entities, with a preference for nonprofit and government; and
 - Applicants need not be PGE customers; however, projects must provide a community benefit in areas PGE serves.
- **Grant Scope:**
 - Projects must advance transportation electrification and provide a benefit to residential customers, with a preference for projects that address the needs of underserved communities¹⁶;
 - Funds may not cover projects that could instead be implemented through other PGE programs (chiefly, the business EV charging program that PGE has proposed); and
 - Any charging stations that are funded will be demand response enabled, and PGE will claim the Clean Fuels Program credits for energy dispensed from these stations and direct it back to the pool of funding available for future years of the Drive Change Fund.
- **Other Assistance:**
 - Technical assistance will be offered to help applicants connect with vendors, assess project budgets and scope, navigate technical requirements, and prepare compelling applications; and
 - Financial assistance will be offered to compensate qualifying applicants for staff time required to prepare an application.
- **Process:**
 - A third-party evaluator will evaluate applications, with an internal PGE selection committee making final funding decisions.

PGE is also considering the following enhancements over the 2020 through 2022 timeframe:

- **A letter of intent process**, to allow potential applicants to formally express intent and receive feedback on their project ideas prior to investing staff time to develop a full application;
- **Multiple funding rounds per year**, to allow more flexibility for applicants and expedite disbursement of funds;
- **Expanded in-house technical assistance** for applicants; and
- **An impact study**, potentially following the 2020 program year, to assess aggregate impact of all projects funded.

¹⁵ See: <https://trustbasedphilanthropy.org/> (Accessed 9/9/19)

¹⁶ For the 2019 Drive Change Fund, PGE provided the following definition: “Underserved communities include, but are not limited to: low-income individuals; communities of color; immigrants; non-English speakers, the long-term unemployed; communities that have been displaced from the urban core; communities with limited access to transportation options; women and girls; veterans; senior citizens; people with disabilities; and members of the LGBTQ+ community. Additional communities that have been underserved by access to electric vehicles include, but are not limited to: residents of multi-family housing; and areas with a low density of public charging stations.” See: <https://portlandgeneral.com/-/media/public/business/make-my-business-more-sustainable/documents/eligibility-information.pdf?la=en> (Accessed 11/04/2019)

3.1.3 Reporting

As awarded projects are deployed, PGE will collect data to understand efficacy and impact. Data to be collected may include, but is not limited to: actual project costs, number of residential customers benefitted, underserved communities impacted, percentage of funded projects and percentage of funds primarily benefitting underserved communities, electric miles travelled, energy dispensed through EV charging infrastructure, and other impacts as appropriate per project. Data will help PGE refine the grant fund in future years and will inform the development of future program proposals.

PGE will report results and learnings from the program in its next TE Plan, to be filed pursuant to the rules adopted through Commission Order No. 19-134 in OPUC Docket No. AR 609.

3.1.4 Principle Alignment

Table 3 below demonstrates how the Drive Change Fund aligns with the Program Design Principles:

Table 3 Drive Change Fund Principle Alignment

Principle	Program Considerations
1. Support the goal of electrifying Oregon’s transportation sectors	The Drive Change Fund advances transportation electrification by offering grants to customers for all types of transportation electrification activity. It is PGE’s goal that the fund support electrification in diverse ways, in diverse sectors, and at different points along the value chain. PGE also intends to use learnings from funded projects to inform future program design and selection. Lastly, since CFP credits from all funded EV charging infrastructure are claimed by PGE and directed back into programming under Docket No. UM 1826, these projects will advance transportation electrification in a long-term way.
2. Provide majority of benefits to residential customers	The fund provides benefits to residential customers, as funded projects are required to be designed to provide a public benefit. Additionally, activities that would clearly primarily benefit private companies (such as fleet vehicles or charging) are explicitly ineligible for funding. The prioritization of projects proposed by non-profits and public agencies helps ensure that these groups are the primary beneficiary of any incidental benefits.
3. Provide benefits to traditionally underserved communities	The fund provides benefits to traditionally underserved communities directly through technical assistance and capacity-building in the fund application process; and indirectly through funded projects. Addressing the needs of underserved communities carries weight in the application evaluation process, and PGE will report on the impacts on underserved communities through funded projects.
4. Programs are designed to be independent from ratepayer support 5. Programs are developed collaboratively and transparently 6. Maximize use of funds for implementation of programs	Portfolio-level considerations of these Principles are discussed in Section 4, Program Design Principle Alignment.

3.1.5 Stakeholder Feedback

Generally, stakeholders have expressed support of the Drive Change Fund. Some of the specific grant fund recommendations we heard in the stakeholder engagement process include:

- **Financial assistance is important:** PGE agrees, and plans to continue offering financial assistance to qualifying applicants to support the staff time required to prepare an application.
- **Limit reporting requirements:** PGE will continue to try to strike the right balance between keeping reporting requirements reasonable for grant awardees; and collecting enough information to assure that the funds are being spent responsibly and efficiently.
- **Establish soft targets (such as types of applicants, number of EVs put on the road, number of applicants with focused on equity missions, etc.):** PGE is interested in assessing such metrics for the 2019 applicant pool and grant awardee pool, including in its impact study. The company will consider establishing soft targets in future years once a baseline has been established.
- **Clearly define “community benefit” and how it links to benefits for residential customers:** For the 2019 Drive Change Fund, PGE included the following question and answer in a FAQ document to potential applicants:

What does it mean to provide a community benefit, and why is this a requirement?

It’s important that each application provide a community benefit because this is how PGE ensures that the value of the Clean Fuels Program credits is returned to residential customers. We encourage applicants to demonstrate a community benefit beyond just the cost savings, air and water quality improvements, and greenhouse gas benefits that all EVs provide. That could be, for example, demonstrating that your project will: transport members of the community, deliver critical goods and services to community members, add mobility options for the community, add to the body of public knowledge about transportation electrification, or enable your organization to expand your social services. Providing a community benefit does not mean that projects must be made publicly available or free – applicants can still charge for services or limit access to specific segments of the public. In contrast, projects that propose to electrify behind-the-scenes fleet vehicles are not good candidates for the Drive Change Fund.

3.1.6 Budget

The overall budget for the Drive Change Fund is as follows in Table 4 (for more detail, see Appendix A, Portfolio Budget):

Table 4 Drive Change Fund Budget

Drive Change Fund Budget	
Grant Funds	\$ 2,250,000
Technical Assistance	\$ 75,000
Financial Assistance	\$ 50,000
Outreach and Education	\$ 10,000
Third-Party Evaluator	\$ 90,000
Program Management	\$ 90,000
Contingency	\$ 32,000
Drive Change Fund Total	\$ 2,597,000

PGE intends to operate the Drive Change Fund on an annual basis with Clean Fuels Programs proceeds, funded at a minimum of \$2,000,000 in each of 2021 and 2022.

3.1.7 Estimated Timeline

The timeline for the Drive Change Fund in 2020 may vary depending on the number of funding rounds offered; however, it is PGE’s goal to announce awards of all grant funds by the end of 2020.

3.2 Public Outreach Activities

3.2.1 Background

PGE supports the goals of SB 1044: 50,000 EVs on Oregon roads by the end of 2020, and 250,000 by the end of 2025. The Company also recognizes how much work is necessary to help the state, and its citizenry, achieve those goals.

In 2018, PGE conducted research among its residential customers about attitudes toward ownership of electric vehicles. The research established a customer journey: from EV Non-Considerer, to EV Considerer, to EV Intender, to EV Owner. The research suggests that broad opportunities exist to move EV Considerers to EV Intenders, and EV Intenders to EV Owners. Taken together, these two groups comprise 25% of PGE's more than 750,000 residential customers, and a considerable opportunity to move the market. To that end, PGE plans to engage in a variety of public outreach activities to raise awareness and educate customers about the benefits of EVs.

There is also the unique opportunity to leverage the mobilization of business leaders and state and local officials around the World Electric Vehicle Symposium and Exposition (EVS33), which will take place in Portland in June 2020. To this end, PGE will take a leadership role in using this forum as a springboard to generate awareness and engagement around transportation electrification in Oregon.

3.2.2 Program Description

In 2020, PGE plans the following public outreach activities:

- **Design/Build Challenge** – In partnership with PacifiCorp and TriMet, PGE will work with the Construct Foundation to engage middle schoolers in a design/build challenge to develop solutions toward a low-carbon transportation future for the next generation. Nearly 200 6th-8th grade students from across the state will be engaged throughout the 2019-2020 school year in this project. Guided by experts, students will learn about, and apply, design-thinking principles in collaborative workshop and team settings. Topics will include advancing transportation electrification, innovation within transportation electrification, and equity of access to electric vehicles. PGE views students as a key demographic generally omitted from the discussion of transportation electrification – and, as with topics like climate change, recycling, and energy efficiency, PGE expects and hopes that participating students will become important ambassadors for transportation electrification within their families and communities. Winning concepts will be showcased in June 2020, and awards will be presented at the Awards Event and TE Festival discussed below. The primary success metric for this activity is engagement with 200 students.
- **Statewide Campaign** – To engage a broader group of customers in the excitement around transportation electrification, PGE will work with PacifiCorp and others to sponsor a statewide campaign focusing on communicating that transportation electrification is here today and meets the needs of all people and all business types. Funds will cover narrative development, storytelling, media outreach, and dealership engagement. The campaign will deliver the following messages:
 - Electric transportation options are here today, and are available in multi-modal applications that meet a variety of transportation needs including rural, urban, on-farm, on-road, off-road, micromobility and public transit applications;
 - Transportation electrification is a critical piece of meeting the state's environmental and climate goals; and

- Oregon is a national leader in this space.

The goals of the campaign are to engage and educate all Oregonians, accelerate transportation electrification in the state, and debunk the notion that transportation electrification is only available to the wealthy few. The primary success metrics for this activity are customer awareness of EVs (as determined by the Oregon Electric Vehicles Collaborative¹⁷) and EVs sold in the state relative to the prior year.

- **Mobility Hub** – PGE plans to design and create a demonstration electric mobility hub in inner Southeast Portland. The hub will include way-finding, public Wi-Fi, public tablet/phone charging, power wheelchair charging, community space coupled with micromobility options and active modes of transportation (scooters, e-bikes, etc.), and possibly electric car share. PGE has worked closely with the City, County, TriMet and local businesses to identify transportation priorities for the mobility hub, which include decreasing parking demands in the neighborhood, providing mode-share options for nearby employees, decreasing instances of trespassing on private property for the purposes of device charging, and use of public Wi-Fi. This demonstration mobility hub will help us better understand how to deploy similar models across the region; how mobility hubs might interact with public transit as a first- or last-mile solution; and how electric mobility can help decrease parking demands. It will also facilitate the adoption of electricity as a transportation fuel for customers who do not or cannot drive, offer a way to decrease passenger vehicle trips, encourage transit ridership, and provide alternate options for midday errands for those working in inner Southeast Portland. The primary success metric for this activity is rides starting and ending at the mobility hub.
- **Oregon’s Amazing TE Race** – In coordination with the statewide campaign mentioned above, PGE will work with PacifiCorp and other local partners to design a statewide game, to be deployed via smartphone app, that will *gamify* transportation electrification across the state to engage and educate Oregonians. Communities will be given the chance to highlight and showcase their transportation electrification work, and will be important partners in getting the word out about the game. In order to be as equitable and accessible as possible, the game will engage residents where they are today, without the need to travel to see examples of projects such as innovative electric car-share programs; fast-charging hubs; and electric transportation vehicle examples, from scooters to Class 8 tractors. Participants will earn points by engaging in a variety of app-based activities and learning modules, and awards will be presented at the Awards Event and TE Festival discussed below. The primary success metrics for this activity are downloads of the app, interactions with the app, and media coverage about the game.
- **Awards Event and TE Festivals** –PGE will work with local partners to leverage events across the state to include transportation electrification messaging and activities. The goal of the events is to demonstrate the range of technologies and applications that comprise the transportation electrification portfolio, consistent with the messaging from the statewide campaign and the Amazing TE Race app. The audience will be residential, business, and municipal utility customers throughout Oregon. The primary success metric for these activities is attendance.
- **Ride-and-Drive** – Through PGE’s activity under SB 1547, the company is planning several ride-and-drive events throughout its service area in 2020. PGE will use CFP funds to add one or more incremental, high production value ride-and-drives to the schedule, and will leverage the event(s)

¹⁷ See: <https://orsolutions.org/osproject/oregon-electric-vehicle-collaborative-summary> (Accessed 11/06/2019)

to continue learning about different approaches to customer engagement. The event(s) will be targeted to those residential customers who are most likely to purchase cars in the near term, and PGE plans to gather customer feedback and lessons learned from the event that will help inform future ride-and-drives. The primary success metric for this activity is 600 test drives.

As appropriate, PGE will publicly credit the Oregon Clean Fuels Program as the source of funding that supports these activities.

3.2.3 Reporting

PGE will report results and learnings from the program in its next TE Plan, to be filed pursuant to the rules adopted through Commission Order No. 19-134 in OPUC Docket No. AR 609.

3.2.4 Principle Alignment

Table 5 below demonstrates how these Public Outreach Activities align with the Program Design Principles:

Table 5 Public Outreach Activities Principle Alignment

Principle	Program Considerations
1. Support the goal of electrifying Oregon’s transportation sectors	PGE’s public outreach activities will advance transportation electrification by raising awareness and educating customers on the benefits of EVs. In several activities, PGE will leverage existing investments, programs or opportunities to achieve this goal.
2. Provide majority of benefits to residential customers	In all cases, residential customers are the targets of the outreach activities. Further, the activities will benefit residential customers by engaging on new levels and in new ways. For example, the Design/Build Challenge will engage students, who can be influential in educating other family members around climate and technology issues. The Amazing Race App and the Statewide Campaign will have a broad reach across the state, and will target residential customers who aren’t necessarily looking for EV-related content.
3. Provide benefits to traditionally underserved communities	These activities will provide benefits to traditionally underserved communities by reaching beyond the privately owned vehicle market. Some activities, such as the Ride-and-Drive, will still work to move the mass market. However, other activities such as the Design/Build Challenge, the Mobility Hub and the Awards Event and TE Festivals have the potential to reframe the discussion around EVs and focus on their availability in all types of transportation spaces – transit, off-road, on-road, micromobility, etc. This will enable these activities to engage lower-income, rural, transit-reliant, and other underserved communities.
4. Programs are designed to be independent from ratepayer support 5. Programs are developed collaboratively and transparently 6. Maximize use of funds for implementation of programs	Portfolio-level considerations of these Principles are discussed in Section 4, Program Design Principle Alignment.

3.2.5 Stakeholder Feedback

Stakeholders have generally expressed support of PGE using CFP proceeds to support public outreach activities. Some of the specific questions and recommendations we heard in the stakeholder engagement process include:

- **Question about how these activities (especially those surrounding EVS33) benefit residential customers:** PGE’s plan is for these activities to leverage the opportunity that EVS33 presents, rather than for them to support EVS33. EVS33 is an industry conference that, while important and influential among individuals and organizations working in the TE space, will have limited appeal and relevance for the average residential customer. However, the mobilization of business and elected leaders around EVS33 (which has already begun) presents the opportunity to engage a broader group of stakeholders to support and participate in the public outreach that PGE plans for next year. To be clear, no Clean Fuels Program funding will be used for sponsorship of EVS33 or formal EVS33 events.
- **Recommendation to link branding to the Oregon Clean Fuels Program:** As appropriate, PGE will publicly credit the Oregon Clean Fuels Program as the source of funding that supports these activities.

3.2.6 Budget

The overall budget for Public Outreach Activities is as follows in Table 6 (for more detail, see Appendix A, Portfolio Budget):

Table 6 Public Outreach Activities Budget

Public Outreach Activities Budget	
Design/Build Challenge	\$ 50,000
Statewide Campaign	\$ 350,000
Mobility Hub	\$ 350,000
Oregon’s Amazing TE Race	\$ 250,000
Awards Event and TE Festival	\$ 250,000
Ride and Drive	\$ 50,000
Public Outreach Activities Total	\$ 1,300,000

3.2.7 Estimated Timeline

PGE anticipates completing – or being well on the way to completing – all these activities by the end of 2020.

3.3 Smart Charging Pilot

3.3.1 Background

PGE’s Smart Grid Test Bed (Test Bed)¹⁸ is a first-of-its-kind-project that integrates smart grid technology at scale. The Test Bed spans three distinct neighborhoods within PGE’s service area, in Hillsboro, Milwaukie and North Portland. Through the Test Bed, the company is working with 20,000 customers to take advantage of special demand-response signals as well as incentives for using smart-home

¹⁸ See: <https://www.portlandgeneral.com/our-company/energy-strategy/smart-grid/smart-grid-test-bed> (Accessed 10/10/2019)

technologies, giving them greater control over their energy use and carbon footprint. With this Smart Charging Pilot, PGE will leverage a vehicle telematics tool to track EV driver habits in the test bed and understand how pricing signals can shift EV charging behavior.

3.3.2 Program Description

PGE will implement the Smart Charging Pilot in partnership with an implementation vendor. EV drivers in the Test Bed will be incentivized to install a small onboard device that accesses their vehicle's telematics, and the customer and PGE will have access to data including charging habits, battery state of charge, etc. The data will inform PGE where and when customers are typically in need of charging infrastructure, as well as give insights into real-time system load from EV charging. Drivers will have access to their own individual data, whereas PGE will receive anonymized data through an encrypted file transfer protocol.

Because the insights are tied to the vehicle and not to the charging station, PGE will be able to reward participating customers for smart charging behavior at home and elsewhere in the service area. Smart charging behavior could include adjusting when the driver elects to charge the car, or the location where they choose to charge – opening possibilities to better understand the potential for non-wires alternatives to infrastructure upgrades in the future. The pilot will test different messaging and incentive levels to understand the most effective ways of influencing charging behavior.

PGE will leverage this pilot to enhance EV awareness-building efforts with customers in the Test Bed, and use learnings from the pilot to inform the development of future programs and solutions.

PGE's goal for participation in the Smart Charging Pilot is 500 customers; recruitment of EV drivers outside the Test Bed may be used to establish a control group.

3.3.3 Reporting

PGE will report results and learnings from the program in its next TE Plan, to be filed pursuant to the rules adopted through Commission Order No. 19-134 in OPUC Docket No. AR 609.

3.3.4 Principle Alignment

Table 7 below demonstrates how the Smart Charging Pilot aligns with the Program Design Principles:

Table 7 Smart Charging Pilot Principle Alignment

Principle	Program Considerations
1. Support the goal of electrifying Oregon’s transportation sectors	The Smart Charging Pilot will advance the body of knowledge around effective incentives and messaging to influence customer EV charging behavior in a way that supports the grid. The pilot will also directly reward residential EV drivers, increasing the value proposition of driving electric and potentially directly influencing vehicle purchasing decisions.
2. Provide majority of benefits to residential customers	PGE plans to use learnings from this pilot to inform future programs that may reward EV drivers for grid-friendly charging behavior. Such programs have the potential to benefit not only EV drivers, but all customers by lowering the cost of integrating renewables, avoiding capital investments through smart energy use, and avoiding the purchase of costly peak energy by smoothing load curves.
3. Provide benefits to traditionally underserved communities	By offering cash rewards for grid-friendly charging behavior, this program will increase the value proposition of driving electric and may enable some lower-income customers to consider purchasing an EV. Additionally, rewards will be made available to participating customers wherever and whenever they charge (including at home using a non-networked Level 1 charging cord, which may be more common for lower-income customers). This is not currently possible in other program designs.
4. Programs are designed to be independent from ratepayer support 5. Programs are developed collaboratively and transparently 6. Maximize use of funds for implementation of programs	Portfolio-level considerations of these Principles are discussed in Section 4, Program Design Principle Alignment.

3.3.5 Stakeholder Feedback

Several stakeholders expressed significant support for the smart charging pilot as a way to learn more about how customers respond to incentives and messages and explore the potential for EVs to support the grid. In particular, stakeholders expressed support for leveraging the company’s existing investment in the Smart Grid Test Bed. Some of the specific questions and recommendations we heard in the stakeholder engagement process include:

- **What is the plan for sharing data from this pilot?** PGE will share aggregated (and anonymized) data, as available, through future Transportation Electrification Plans.
- **What is the timeline?** This is a three-year pilot, and PGE plans to earmark CFP funding in 2021 and 2022 to support the continuation of the pilot.

3.3.6 Budget

The three-year budget for the Smart Charging Pilot is as follows in Table 8 (for more detail, see Appendix A, Portfolio Budget):

Table 8 Smart Charging Pilot Budget

Smart Charging Pilot Budget	2020	2021	2022
Hardware and Data Licensing	\$ 190,000	\$ 140,000	\$ 140,000
Program Setup	\$ 25,000	-	-
Customer Rewards Incentives (maximum)	\$ 150,000	\$ 150,000	\$ 150,000
Outreach and Education	\$ 50,000	\$ 25,000	-
Data Evaluation	-	-	\$ 20,000
Contingency	\$ 5,000	\$ 3,000	\$ 2,000
Smart Charging Pilot Total	\$ 420,000	\$ 318,000	\$ 312,000

3.3.7 Estimated Timeline

PGE intends to operate this pilot for three years:

- 2020: Program launch, recruitment, and customer rewards begin;
- 2021: Customer rewards continue; and
- 2022: Customer rewards conclude, and data evaluation.

3.4 DC Fast Charging Site Upgrades

3.4.1 Background

Oregon’s early momentum on electric vehicles led to the construction of one of the earliest build-outs of DC fast charging infrastructure. Projects such as the West Coast Electric Highway¹⁹, Oregon Electric Byways²⁰, and The EV Project²¹ installed dozens of DC fast chargers at key corridor locations throughout the state. However, much of this work occurred when CHAdeMO (used by Japanese carmakers such as Nissan) was the dominant (or only) fast charging protocol. Today, more automakers use a fast charging protocol called the Combined Charging System (CCS). Accordingly, most DC fast charging is currently built to accommodate both protocols, enabling drivers of either type of vehicle to charge at the location. Yet Oregon’s public DC fast charging network remains heavily CHAdeMO-based, meaning that drivers of CCS vehicles cannot charge at the all the DC fast charging locations in the state. Figure 1 and Figure 2, below, show that there are 96 public CHAdeMO charging sites in Oregon relatively generously distributed across the state, versus 49 public CCS charging sites largely concentrated near the I-5 corridor.²²

¹⁹ <http://www.westcoastgreenhighway.com/electrichighway.htm>

²⁰ <https://traveloregon.com/things-to-do/trip-ideas/electric-vehicle-trips/oregon-electric-byways/>

²¹ <https://avt.inl.gov/project-type/ev-project>

²² U.S. Department of Energy, Alternative Fuels Data Center, Alternative Fueling Station Locator. Retrieved from <https://afdc.energy.gov/stations> (Accessed 10/28/2019)

Figure 1 CHAdeMO DC Fast Charging Ports in Oregon

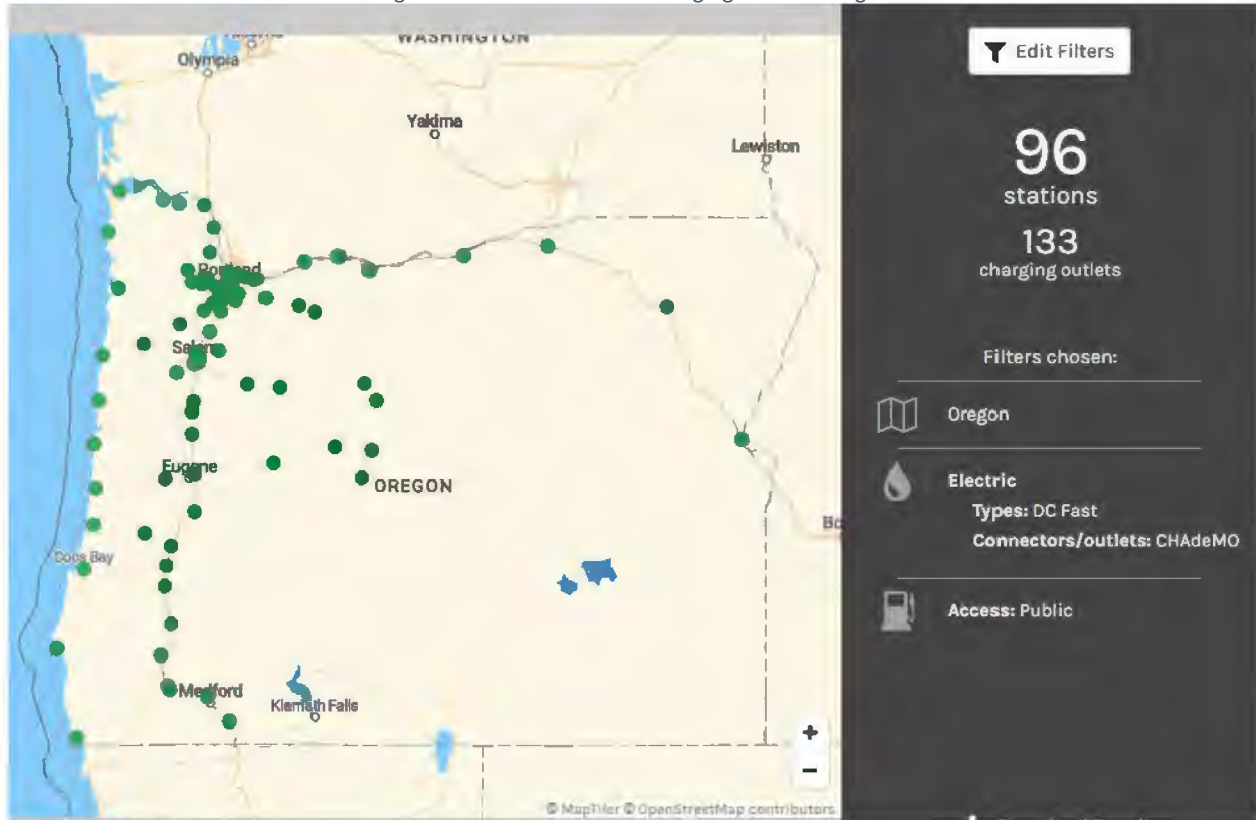
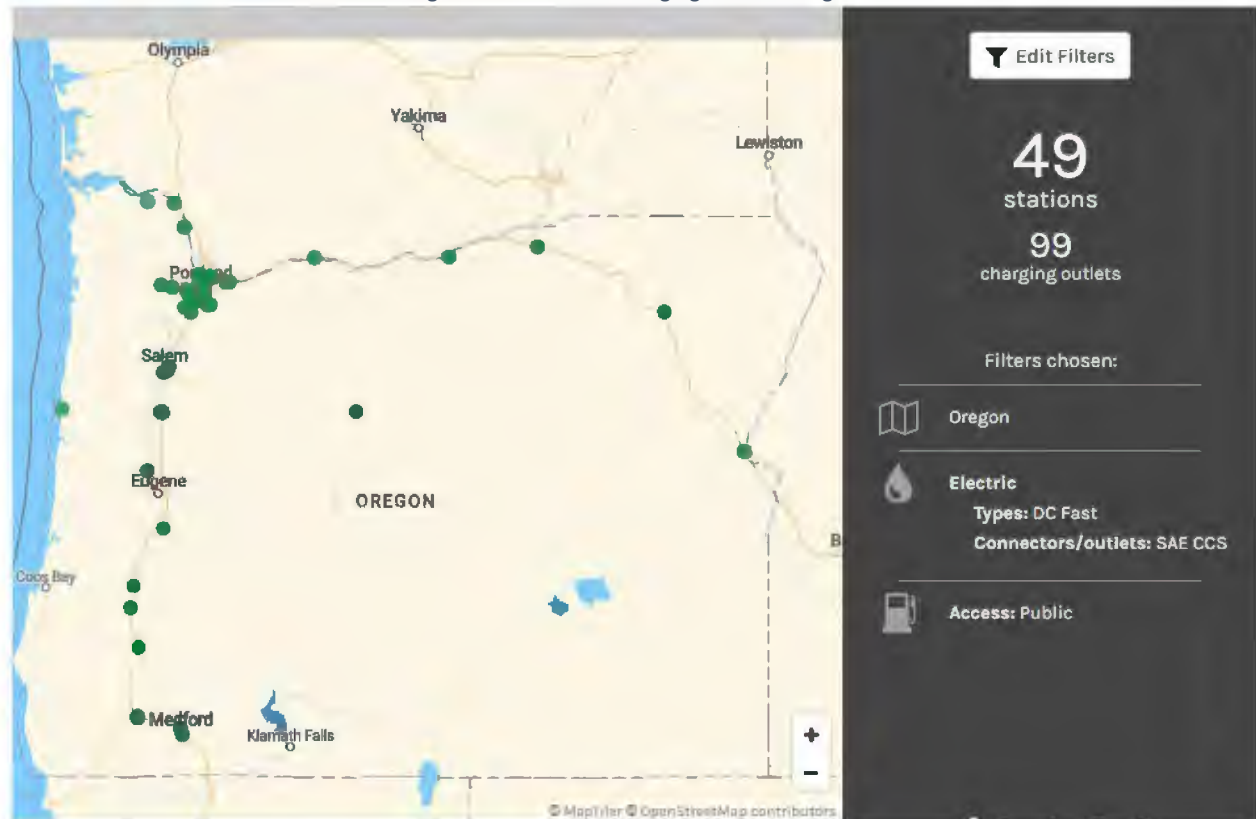


Figure 2 CCS DC Fast Charging Ports in Oregon



3.4.2 Program Description

PGE sees the need for investment to support the upgrade of legacy DC fast charging sites to ensure that: (1) CHAdeMO-only sites are converted to dual-protocol DC fast charging technology; (2) sites are equipped with necessary resources to ensure high equipment up-time and positive user experience; and (3) sites are deployed with the right number and speed of charging stations (in some cases, possibly replacing DC fast charging stations with L2 if appropriate for the site). PGE sees value in upgrading existing sites to meet the needs of today's electric vehicles, in addition to the broader goal of investing in new dual-protocol DC fast charging sites (pursued through utility programs such as PGE's expansion of the Electric Avenue network; or through third-party programs such as Electrify America). PGE also sees value in not limiting DC fast charging site upgrade funding exclusively to the PGE service area, in acknowledgement of the fact that PGE residential customers frequently travel outside the service area and may be in need of charging options on the road.

Each site is unique with respect to equipment, ownership, branding, site host agreement terms, stakeholders, and configuration. PGE therefore aims to keep the program design flexible, and rely on the use of signed agreements with EVSPs, site hosts, or customers to codify requirements. Broadly, PGE intends to adhere to the following design elements:

- To ensure that best practice is followed, each site will be required to meet technical requirements that support safety, reliability, interoperability, grid connectedness, and payment accessibility. PGE intends to use the technical requirements for public DC fast charging established for the Drive Change Fund as guidance.²³ This will include PGE's claim of the Clean Fuels Credits from upgraded sites and direction of the resultant proceeds back to the pool of funding governed by Docket No. UM 1826.
- To ensure that PGE residential customers receive a majority of benefits from the program, PGE will develop a prioritization framework to help with site selection. Criteria may include, but will not be limited to: presence within (or proximity to) PGE's service area; site's ability to meet a need defined by PGE's TE Plan; nearby amenities; traffic patterns; site utilization metrics; and site host or equipment owner interest in upgrading sites.
- Since some of these sites would also benefit from additional upgrades—for example: standardizing charging networks at a site (e.g. Level 2 charging equipment that could be placed on the same network as the DC fast charger); deploying additional charging ports at sites that see high utilization; modifying charging speeds to reflect best use case for the site; relocating charging stations to a more prominent or accessible location; or other site upgrades related to visibility, customer experience, safety, and security—PGE may elect to spend CFP funds on these additional upgrades. This offer would only be made available at sites where the DC fast charging equipment is also being upgraded.
- In the spirit of collaboration, PGE may work to partner with other utilities in some of this work, particularly sites outside of PGE's service area.
- To protect the interests of EV drivers, PGE intends to ask potential grantees to provide pricing plans and to review these for reasonableness. This is similar to the process PGE uses for EVSE installed using Drive Change Fund awards.

²³ See: <https://portlandgeneral.com/-/media/public/business/make-my-business-more-sustainable/documents/technical-requirements.pdf?la=en> (Accessed 10/28/2019)

- If the current owner or site host is unwilling or unable to upgrade the equipment to PGE’s standards, PGE is willing to work with the customer to evaluate ownership of EVSE at the site host’s request. In these cases, to avoid impact to ratepayers, the company intends to earmark ongoing CFP funds for operations and maintenance. In these cases, PGE would look to leverage Schedule 50, Retail Electric Vehicle Charging Rates, to set EV driver pricing.²⁴
- PGE intends to deploy Clean Fuels Program proceeds with urgency. As such, if there are undistributed funds remaining toward the end of 2020, those funds may be transitioned to other Clean Fuels Funds program activities (e.g. Drive Change Fund, School Bus Electrification, Smart Charging Pilot, Public Outreach, etc.). If additional funding is required for DC fast charging site upgrades, PGE may look to other CFP initiatives that are under budget or to the 2021 Clean Fuels Program Plan to support the continuation of this program.

3.4.3 Reporting

PGE will report results and learnings from the program in its next TE Plan, to be filed pursuant to the rules adopted through Commission Order No. 19-134 in OPUC Docket No. AR 609.

3.4.4 Principle Alignment

Table 9 below demonstrates how the DC Fast Charging Site Upgrades program aligns with the Program Design Principles:

Table 9 DC Fast Charging Site Upgrades Principle Alignment

Principle	Program Considerations
1. Support the goal of electrifying Oregon’s transportation sectors	This program will advance transportation electrification by helping to bring certain sites within the state’s network of DC fast charging up to current standards. This will ensure that past investments do not become stranded assets, but are modernized and remain a relevant component of the state’s TE infrastructure.
2. Provide majority of benefits to residential customers	Residential customers will be the primary beneficiary of these sites being upgraded to meet current standards. PGE will prioritize sites that we believe are most likely to benefit PGE’s residential customers.
3. Provide benefits to traditionally underserved communities	Lack of charging infrastructure unduly impacts underserved communities (low-income customers, those with limited access to home charging, and those living in areas with limited public charging), especially those who may own older EVs with shorter ranges that require more charging options. With this program, PGE aims to address the needs of underserved communities as defined in Order No. 18-376.
4. Programs are designed to be independent from ratepayer support 5. Programs are developed collaboratively and transparently 6. Maximize use of funds for implementation of programs	Portfolio-level considerations of these Principles are discussed in Section 4, Program Design Principle Alignment.

²⁴ See: https://www.portlandgeneral.com/-/media/public/documents/rate-schedules/sched_050.pdf (Accessed 11/05/2019)

3.4.5 Stakeholder Feedback

Stakeholders generally supportive investment in the upgrade of DC fast charging sites in the state. Some stakeholders voiced more specific questions about how the program will support charger interoperability and best-practice protocols, and requested more detail on how the program plans to provide a majority of benefits to PGE’s residential customers remain independent from ratepayer support.

PGE’s intended program design elements, outlined above in Section 3.4.2, are included here to give guidance on how the company plans to approach these important considerations.

3.4.6 Budget

The overall budget for the DC Fast Charging Site Upgrades program is as follows in Table 10 (for more detail, see Appendix A, Portfolio Budget):

Table 10 DC Fast Charging Site Upgrades Budget

DC Fast Charging Site Upgrades Budget	
Funds for Site Upgrades	\$ 750,000
Program Management	\$ 36,000
DC Fast Charging Site Upgrades Total	\$ 786,000

In the event that PGE takes ownership of any DC fast charging equipment, an operations and maintenance budget will be established in future Clean Fuels Program Plans.

3.4.7 Estimated Timeline

The estimated timeline for this program is as follows:

- Q4 2019 – Site host and EVSP outreach and discussions
- Q1-2 2020 – Site selection and scoping of upgrades
- Q2-4 2020 – Construction of sites

3.5 Portfolio Administration

PGE forecasts a portfolio administration budget of \$118,000 for the funds from 2018 CFP credits, some of which has already been spent. This budget area is entirely administrative, and includes such costs as portfolio planning and design, portfolio launch, compliance obligations, stakeholder engagement, and credit monetization.

The overall budget for Portfolio Administration is as follows in Table 11 (for more detail, see Appendix A, Portfolio Budget):

Table 11 Portfolio Administration Budget

Portfolio Administration Budget	
Credit Monetization	\$ 100,000
Program Management	\$ 36,000
Portfolio Administration Total	\$ 136,000

On November 13, 2019, the Oregon EV Collaborative team (which established through the Oregon Solutions process) convened the final meeting. Through the groups discussions around how to ensure the

accountability of and to keep the momentum of the group going forward, several parties suggested potentially leveraging the utilities’ Clean Fuels funding towards managing that group and process going forward. Though in principle we are supportive of this concept, the idea needs additional development. PGE will work with the Oregon EV Collaborative team to determine the best path forward and may contribute Clean Fuels dollars towards resourcing future activities in 2020 (this would be incremental to what is outlined above).

PGE intends to deploy Clean Fuels Program proceeds with urgency. As such, if there are undistributed funds remaining toward the end of 2020 in any of the project categories, those funds may be transitioned to other Clean Fuels Funds program activities (e.g. Drive Change Fund, School Bus Electrification, Smart Charging Pilot, DC Charger Upgrades, Public Outreach, etc.).

Section 4 Program Design Principle Alignment

In addition to program-specific alignment with Principles 1-3 discussed in Table 3, Table 5, Table 7 and Table 9, Table 12 shows how PGE’s planned portfolio aligns with Principles 4-6.

Table 12 Portfolio Principle Alignment

Principle	Portfolio Considerations
4. Programs are designed to be independent from ratepayer support	The Portfolio is designed to be independent from ratepayer support. PGE has intentionally planned a portfolio of programs that do not exhaust the budget on hand, making it unlikely that additional support will be necessary. In particular, the Drive Change Fund offers flexibility to increase or decrease budget depending on the amount of funding available. Additionally, by claiming the Clean Fuels Program credits from EVSE under CFP-funded programs, PGE is establishing potential long-term reimbursement streams from its 2020 programs, which will add to the amount of future funding available under Docket No. UM 1826.
5. Programs are developed collaboratively and transparently	As discussed in the Stakeholder Engagement section below, PGE shared a draft of this plan with stakeholders on the Docket No. UM 1826 service list in September of 2019. PGE also participated in two stakeholder engagement workshops in September and October of the same year. PGE appreciates the feedback from stakeholders and has integrated their suggestions into many of the programs. For more detail on the stakeholder engagement process, see Section 5, Stakeholder Engagement.
6. Maximize use of funds for implementation of programs	PGE has strived to maximize use of funds for implementation of programs, including planning to claim CFP credits from installed charging infrastructure to deliver ongoing benefits. Administrative costs vary by program, but the administrative overhead of the Portfolio is forecasted to be 9%.

Section 5 Changes from 2019 Clean Fuels Program Plan

In addition to the new allocations of Clean Fuels Program residential credit sale proceeds discussed above, PGE plans the following changes to programs announced in its 2019 Clean Fuels Program Plan. These

changes were discussed in PGE’s draft 2020 Clean Fuels Program Plan and at stakeholder workshops, where they received stakeholder support.

- **Subsidized Electric Avenue Access Reallocation** – In its 2019 Clean Fuels Program Plan, PGE allocated \$585,000 for subsidized Electric Avenue access, to be offered to customers receiving an income-qualified Charge Ahead rebate from the State of Oregon. As of September 2019, the state had not yet begun issuing Charge Ahead rebates, which delayed the implementation of this program. Given the stakeholder interest in the timely deployment of credit proceeds, and the level of demand for the 2019 cycle of the Drive Change Fund, PGE has reallocated these funds to the 2019 Drive Change Fund and earmarked the funds for projects that help meet the needs of underserved communities.
- **School Bus Electrification Pilot** – In its 2019 Clean Fuels Program Plan, PGE planned for the School Bus Electrification Pilot to be allocated an upfront investment of \$2,092,000, and expected that \$980,000 therefrom would be reimbursed over time through financing mechanisms with school districts. For simplicity, PGE now plans to earmark the full \$2,092,000 for school bus electrification.

Section 6 Stakeholder Engagement

PGE distributed a draft program plan to stakeholders on the Docket No. UM 1826 service list in September of 2019 and collected feedback throughout September and October, both in written format and through two stakeholder engagement workshops hosted by the Commission. The company received feedback from the following stakeholders:

- Bonneville Environmental Foundation
- Climate Solutions
- Forth Mobility
- Greenlots
- Mid-Columbia Economic Development District
- Northwest Energy Coalition
- Oregon Citizens’ Utility Board
- Oregon Department of Energy
- Oregon Department of Environmental Quality
- Oregon Department of Justice (representing OPUC)
- Oregon Department of Transportation
- Oregon Public Utilities Commission staff
- Union of Concerned Scientists

Stakeholders generally supported the program plans that PGE shared, and PGE appreciated the clarifying questions and other feedback that stakeholders provided throughout the process. In the program descriptions in Section 3, PGE has endeavored to document specific stakeholder feedback, respond to questions about program design, and discuss how the company sees these programs meeting the Program Design Principles. To the extent that consensus is not achieved in the program plans laid out in this document, PGE elects to use its discretion in program design to implement the Portfolio as presented.

Section 7 Conclusion

PGE is pleased to present this Portfolio of programs that meets the Program Design Principles outlined by the Commission. With this Portfolio, PGE looks forward to delivering value to residential customers, engaging underserved communities, and advancing transportation electrification by tackling multiple barriers to adoption across a broad spectrum of vehicle types and customer classes.

Appendices

Appendix A Portfolio Budget

Table 13 Portfolio Budget

	Category	2020 Funding
Drive Change Fund		
Grant Funds	Program	\$ 2,250,000
Technical Assistance	Program	\$ 75,000
Financial Assistance	Program	\$ 50,000
Program Management	Admin	\$ 90,000
Outreach and Education	Admin	\$ 10,000
Third-Party Evaluator	Admin	\$ 90,000
Contingency	Admin	\$ 32,000
Drive Change Fund Total		\$ 2,597,000
Public Outreach Activities		
Mobility Hub	Program	\$ 350,000
Statewide Campaign	Program	\$ 350,000
Oregon's Amazing TE Race	Program	\$ 250,000
Awards Event and TE Festival	Program	\$ 250,000
Design/Build Challenge	Program	\$ 50,000
Ride and Drive	Program	\$ 50,000
Public Outreach Activities Total		\$ 1,300,000
Smart Charging Pilot		
Hardware	Program	\$ 50,000
Data Licensing	Program	\$ 140,000
Program Setup	Program	\$ 25,000
Customer Rewards Incentives	Program	\$ 150,000
Outreach and Education	Admin	\$ 50,000
Contingency	Admin	\$ 5,000
Smart Charging Pilot Total		\$ 420,000
DC Fast Charging Site Upgrades		
Funds for Site Upgrades	Program	\$ 750,000
Program Management	Admin	\$ 36,000
DC Fast Charging Site Upgrades Total		\$ 786,000
Portfolio Administration		
Program Management	Admin	\$ 36,000
Credit Monetization	Admin	\$ 100,000
Portfolio Administration Total		\$ 136,000
Total Portfolio		
Program Costs		\$ 4,790,000
Administrative Costs		\$ 449,000
Total Costs		\$ 5,239,000
Administrative %		9%