



NATURAL RESOURCES DEFENSE COUNCIL
THE EARTH'S BEST DEFENSE

September 9, 2016

FILED VIA EMAIL

Oregon Public Utility Commission
201 High Street SE, #100
Salem, OR 97301

ATTN: Jason Salmi Klotz

RE: AR 599 / Electric Utility Transportation Electrification Program Rulemaking

NRDC appreciates the opportunity provided by the Oregon Public Utilities Commission and staff to participate in this rulemaking, a critical element in the evolution of transportation electrification in Oregon, itself an integral part of Oregon's energy and climate agenda, its commercial vigor and the well being of its families and communities. We also submitted comments to this docket on June 17, 2016.

NRDC is generally satisfied with the structure, direction and detail of the proposed rule, and so limits itself to two observations.

1(a)(A) [Program Description / Program Elements]: The rule would benefit from clarification that the Program is expected to address the recharging needs of personal, commercial *and* transit vehicles as essential transportation system components. Both PAC and PGE draft plans are so far inclusive of transit opportunities and it is important that the OPUC clearly signal the importance of this component of any urban transportation system. Apart from the role of transit in reducing congestion and overall transportation emissions, access to electrified transit is especially important to extending the net benefits of the Program to low-income households, whether they should own a personal electric vehicle or not. In this regard, NRDC concurs with other commenters that the Program Elements section would benefit from explicit OPUC direction for utilities to discuss in detail how their proposed program will be available and beneficial to low income households.

1(e)(A) [Program benefits]: NRDC encourages a generous and inclusive construction of "program benefits", consistent with the expectations voiced during legislative consideration of SB 1547. Utilities

should be directed to discuss program benefits that may include but not be limited to fuel and fuel cost savings, local airshed and greenhouse gas emissions reductions (and health benefits therefrom), congestion reduction and mobility enhancement, and commercial fleet economic advantages among other considerations. As the electricity services utilities provide to residential and commercial structures and processes result in significant societal benefits, so extending electrical services to the transportation system will have similarly cascading beneficial effects. These are additional to the other benefits addressed in 1(e)(B) and 1(e)(C) that are internal to the utility grid and to utility ratepayers, respectively, although both benefits and beneficiaries overlap.

We assume that if these changes are made in the Program Elements and Program Benefits sections of the rule, the utilities will be expected to address outcomes in the Reporting Requirements section.

We acknowledge with appreciation the work and consultation reflected in this rulemaking to date. We expect to be continually engaged with the utilities and the OPUC as the electrification of Oregon's transportation fleets and infrastructure evolve.

Regards,

Angus Duncan, Consultant
for Natural Resources Defense Council