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Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
A World Institute for a Sustainable Humanity
Beneficial State Bank
BlueGreen Alliance
Bonneville Environmental Foundation
Centerstone
Citizens' Utility Board of Oregon
City of Ashland
City of Seattle Office of Sustainability &
Environment
Climate Solutions
Community Action Center
Community Action Partnership Assoc. of Idaho
Community Action Partnership of Oregon
David Suzuki Foundation
Drive Oregon
Earth and Spirit Council
Earth Ministry
Ecova
eFormative Options
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EnergySavvy
Energy Trust of Oregon
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Environment Oregon
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HEAT Oregon
Home Performance Guild of Oregon
Home Performance Washington
Housing and Comm. Services Agency of Lane
Co.
Human Resources Council, District XI
Idaho Clean Energy Association
Idaho Conservation League
Idaho Rivers United
Interfaith Network for Earth Concerns
League of Women Voters Idaho
League of Women Voters Oregon
League of Women Voters Washington
Montana Audubon
Montana Environmental Information Center
Montana Renewable Energy Association
Montana River Action
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Council
NW Natural
NW SEED
OneEnergy Renewables
Opower
Opportunities Industrialization Center of WA
Opportunity Council
Oregon Environmental Council
Oregonians for Renewable Energy Progress
Pacific Energy Innovation Association
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Physicians for Social Responsibility Oregon
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Physicians for Social Responsibility Washington
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Portland General Electric
Puget Sound Advocates for Retired Action
Puget Sound Cooperative Credit Union
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Save Our Wild Salmon
Sea Breeze Power Corp.
Seattle City Light
Seinergy
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
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Smart Grid Northwest
Snake River Alliance
Solar Installers of Washington
Solar Oregon
Solar Washington
South Central Community Action Partnership
Southeast Idaho Community Action Agency
Spokane Neighborhood Action Partners
Student Advocates for Valuing the Environment
Sustainable Connections
The Climate Trust
The Energy Project
The Policy Institute
Trout Unlimited
Union Of Concerned Scientists
United Steelworkers of America, District 12
US Green Building Council, Idaho Chapter
Washington Environmental Council
Washington Local Energy Alliance
Washington State Department of Commerce
Washington State University Energy Program
YMCA Earth Service Corps



NW Energy Coalition

for a clean and affordable energy future

From: JJ McCoy
Senior Policy Associate
NW Energy Coalition

September 9, 2016

To: Jason Salmi Klotz
Oregon PUC

Re: AR 599 Docket - Transportation Electrification Draft Rule

Thank you for the opportunity to comment on the Oregon PUC's draft rule for transportation electrification (TE), and thank you for your attention to our earlier round of comments. The draft as presented appears very workable and well crafted, and it clearly reflects the consensus of prior stakeholder input.

The NW Energy Coalition has the following comments and suggestions at this time:

- 1. LOW-INCOME PROGRAM TARGETS NEEDED -**
Transportation Electrification Program (1)(a) - The Legislature found in SB 1547 that "[w]idespread transportation electrification requires that electric companies increase access to the use of electricity as a transportation fuel in low and moderate income communities." However, the rule as drafted does not require utilities to demonstrate how they plan to achieve that access in low- to moderate-income communities.

We recommend that the program requirements in 860-087-0030 include the following insertion and subsequent renumbering in (1)(a):

"(F) The utility's plan to increase access in low- to moderate-income communities."

This language may also need to be incorporated into the plan-level requirements in 860-087-0020.

In recent weeks, various creative proposals have been floated by Drive Oregon and others to connect social service agencies, public housing locations, transit, vanpools and other modes that often serve low-income populations with EVs, either as agency fleet vehicles or as subsidized ride share programs accessible to tenants. Each of these modes could benefit from utility partnership on the charging infrastructure. For example, the Chrysler Pacifica minivan plug-in hybrid with 30 miles of all-electric range (recently displayed.

at EV Roadmap and expected in showrooms this year [link](#)), would appear to be an ideal vanpool vehicle, and the utility could partner with transit agencies to support charging at designated endpoints

In addition, California's EV charging dockets for the three investor-owned utilities all included numerical targets that require a minimum of 10% of charging installations to be located in disadvantaged communities. This may or may not be feasible in Oregon, and the Commission should consider setting feasible targets. The California utility programs are helped by robust support for low-income EV acquisition using cap and trade revenues, including private ownership rebates targeted at low-income buyers and subsidized electric ride share programs. In Oregon, the utilities may need a similar partner from government general revenue programs to achieve these style of targets.

2. **CLARIFY SCOPE OF PROGRAM BENEFITS** – *Transportation Electrification Program (1)(e)* – SB 1547 cites several general (non-system) benefits to transportation electrification (Sec. 20 (2)(a)). The full scope of these benefits will be relevant when reviewing utility transportation electrification programs by a Societal Cost Test, a Total Resource Cost test or whatever metric is ultimately enacted.

We recommend adding clarification of the scope of net benefits in 860-087-0030 (1)(e)(C):

“(C) A discussion of how a net benefit to ratepayers is attainable. Net benefits may include (but are not limited to) reduced petroleum use, fuel cost savings, incremental net rate revenue, energy efficiency improvements, carbon emission reductions (whether actually monetized in a carbon market or valued by a proxy such as the Social Cost of Carbon or a carbon market reference price), and air quality and human health improvements.”

3. **AVOID PRE-JUDGING MARKET MODELS BEFORE PILOT TESTING IS COMPLETE** – Utilities around the country are currently pilot testing a variety of models for transportation electrification, and we believe that Oregon's program should proceed in that spirit as well, allowing us all to gather real cost data and learn from experience. The NW Energy Coalition disagrees with ChargePoint's contention that Oregon utilities must be constrained into ChargePoint's preferred business model, which was adopted by Southern California Edison. The company seeks to require rolling qualification of all products, to locate the “smarts” for demand response and grid services in the charging equipment (rather than in the vehicle), and to put ChargePoint (not the utility) in the role of marketing its products to the site hosts. It is not at all clear at this juncture whether ChargePoint's model will provide the optimum cost-benefit tradeoff. Indeed, it faces some significant cost challenges, with networked chargers running \$500-\$1000 more than their “dumb” counterparts, plus network fees that can add \$20 per port per month. Contrast this with demand response programs for air conditioners or water heaters in which the radio control unit may cost just \$20.

It is not yet clear whether it will prove more cost effective to locate the network functions in the charging equipment or in the vehicles (see EPRI in-vehicle protocol [link](#)). Utilities may or may not be able to derive greater value with competitive solicitations and volume pricing than would obtain with unconstrained individual site host choice. It is also not

clear that the charging station network is better suited to work with its site hosts on equipment and session pricing than the utility. Indeed, Avista's pilot in Washington is a counterexample where utility staff are taking the lead to work out site parameters for equipment and charging session pricing with their customers. The NW Energy Coalition does not have a preferred model at time but believes the utilities should be free to pursue a variety of models that may ultimately provide the best value for customers. Constraining the programs to one vendor's preferred model would be premature.

Thank you for your consideration, and feel free to contact me at (206) 295-0196 or jj@nwenergy.org if you would like to discuss these issues further.

Regards,

JJ McCoy

cc: Jason Eisdorfer, Julie Peacock, Nadine Hanhan