

September 9, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

RE: AR 599 – Joint Comments of the Alliance of Automobile Manufacturers, American Honda Motor Company, and General Motors in the Rulemaking to Prescribe Application Requirements for Transportation Electrification Programs

The Alliance of Automobile Manufacturers, American Honda Motor Company, and General Motors (Joint Automakers) appreciate the opportunity to in the above-referenced rulemaking. The Joint Automakers provide the following comments pertaining to the draft rules served on July 13, 2016.

The Alliance and General Motors have been active participants in the informal stakeholder process in this docket, and the Joint Automakers plan to engage in the regulatory process over the next several months. We greatly appreciate the efforts of staff and other parties that have contributed to crafting the proposed rules. We believed the proposed rules are designed well and reflect much of the input to date and the intent of SB 1547. Overall, we support the rules as proposed and offer only minor feedback at this time that should better align the rules with SB 1547 and further the goal of transportation electrification.

Overarching Comments

The Joint Automakers are committed to identifying policies and programs that can help support transportation electrification, including battery electric, plug-in hybrid, and hydrogen fuel cell technologies. We believe the utilities can and should be important partners in this effort and believe the draft rules are a step in the right direction. It is too early to determine a single “right” model for utility engagement in transportation electrification. The Joint Automakers therefore applaud staff for drafting rules that are not overly prescriptive with regard to the programs utilities may propose. Additionally, we support the requirement for utilities to propose both long-term plans and more concrete program proposals.

Describing and Evaluating Benefits

It is important to recognize that it will take time to fully realize the widespread benefits of the utilities’ transportation electrification programs, and many of these benefits may not be fully realized in the timeframe of the initial program proposals. Therefore, the Joint Automakers recommend the language in 860-087-0020 clarify that utilities provide information how their program *can reasonably be expected to accelerate transportation* electrification while providing a description of the benefits that can *reasonably be expected* from these programs. This same logic applies to the reporting and evaluation phases as well. Furthermore, we encourage the commission to think about how transportation

electrification, including the role of hydrogen and fuel cell vehicles, can help address grid modernization, such as ancillary services, renewable energy integration, or storage considerations.

Conclusion

The Joint Automakers greatly appreciate the opportunity for comment and the work to date on these draft rules. We also applaud the utilities for holding a series of stakeholder meetings to solicit feedback on potential programs. We see this as the beginning of an iterative process of learning, adapting, and updating transportation electrification programs and plans in Oregon. We look forward to continued involvement in Oregon's transportation electrification efforts.

Sincerely,

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