



September 9, 2016

Via Electronic Filing

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

ATTN: Jason Salmi Klotz

RE: Joint Comments of Drive Oregon and the Oregon Environmental Council in the AR 599 Docket - Transportation Electrification Draft Rule

Drive Oregon is a nonprofit created in 2011 to grow the electric vehicle industry and promote electric transportation in Oregon. We have over 100 companies and organizations as members, from major auto companies to small technology startups, as well as many other companies, interest groups, and organizations.

Founded in 1968, the Oregon Environmental Council (OEC) is a nonprofit, nonpartisan membership-based organization. We advance innovative, collaborative solutions to Oregon's environmental challenges for today and future generations.

Thank you for the opportunity to provide comments on the Commission's proposed draft rules for implementing the transportation electrification section of SB 1547.

We believed the proposed rules are designed well and reflect much of the intention of SB 1547 as well as the discussion of stakeholders during the May and June workshops. Overall, we support the rules as proposed, but do have one item of feedback that we believe, when incorporated, would make the rule more closely align with the language and goals of SB 1547.

Need for Inclusion of Low-Income Focus

SB 1547, in section 20(2)(a-g), stated legislative findings about the benefits of transportation electrification and the required elements of deployment activities in order to maximize those benefits. All except one of these findings have been explicitly or indirectly incorporated within the proposed rules. The third finding, which states "(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," is not included.

The proposed rules would be strengthened by explicitly reflecting this finding, as doing so would ensure the proposed utility programs adhere to the intentions of the Legislature. We would like to suggest two amendments that would establish requirements for the utilities to demonstrate how they will plan to increase access to transportation electrification in low and moderate income communities.

Within 860-087-0020, we recommend the following be inserted beneath (1)(e):
“(f) A discussion of how the Transportation Electrification Plan will increase access to transportation electrification in low and moderate income communities;”

Within 860-087-0030, we recommend the following be inserted beneath (1)(a)(H):
“(I) Where applicable, a description of how the program design supports increased access to transportation electrification in low and moderate income communities;”

Support for Two Year Update

To be the most useful and meaningful, a plan must be current and take into consideration lessons learned from previous efforts. As such, we would like to express our support for the requirement that the utilities must update their plans every two years (860-087-0020(3)). This will ensure the utilities’ plans reflect lessons learned from previous program successes or challenges and incorporate the latest information, technology, and customer needs. Also, the proposed two year time period is an appropriate time frame. A timeframe longer than two years could result in plans that are obsolete, while a timeframe less than two years would likely not give utilities adequate time to evaluate their current programs and consider amendments.

Thank you again for the opportunity to provide comment.

Respectfully Submitted,



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