



September 9, 2016

Jason Salmi Klotz
Oregon Public Utility Commission
201 High Street SE #100
PO Box 1088
Salem, OR 97308

RE: AR 599 Draft Rule

On behalf of Greenlots, I wish to offer our appreciation of the Public Utility Commission staff's effort in developing draft rule language to assist utilities in their development of transportation electrification plans under SB 1547.

Greenlots is a leading provider of grid-focused electric vehicle charging software and services. The Greenlots' network supports a significant percentage of the DC fast charging infrastructure in North America, including the West Coast Electric Highway in British Columbia. Greenlots' smart charging solutions are focused on helping site hosts, utilities, and grid operators manage dynamic EV charging loads. Greenlots supports strong utility investment in transportation electrification and looks forward to the development of utility plans in Oregon.

The Public Utility Commission staff's effort has resulted in a framework that Greenlots is generally supportive of. However, in concurrence with other parties, Greenlots believes that two areas of the proposed rule deserve further attention.

First, we respectfully ask staff to include SB 1547's finding 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" in the final rule by encouraging utilities to address how their respective plans will grow access to electric transportation for low and moderate income communities.

Second, to avoid unintended consequences, such as those raised by Portland General Electric in the Commission's evaluation of relative program success, we respectfully ask staff to take care in the application of SB 1547's finding that "widespread transportation electrification should stimulate innovation, competition, and provide consumers with increased options in the use of charging equipment and in procuring services from suppliers of electricity, attract private capital investments and create high quality jobs in this state" and the subsequent direction to the Commission in considering utility transportation electrification investments.

It is unclear whether the legislature intended this finding and subsequent direction to the Commission to invoke a future vision of a time when widespread transportation electrification exists, and a logical expectation for what that market might look like, and to encourage the Commission to consider whether a proposed utility/ratepayer investment should reasonably be expected to contribute to a widespread transportation electrification future; or indeed, whether the intent was for a widespread transportation electrification future to contain those elements, with attendant close Commission scrutiny of proposed program design to insure a linear pathway to that future.



Greenlots looks forward to staff's continued engagement and the consideration of the issues raised above by Greenlots and other parties' comments.

Sincerely,
/s/ THOMAS ASHLEY
Thomas Ashley
Senior Director, Government Affairs & Public Policy
Greenlots