



ChargePoint, Inc.
254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

August 19, 2016

FILED VIA EMAIL

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

Re: In the Matter of Rulemaking to Prescribe Application Requirements for
Transportation Electrification Programs (AR 599)

Enclosed please find ChargePoint's comments for filing in the above-referenced docket,
in anticipation of the August 22 hearing.

Please contact me if you have any questions. Thank you.

Respectfully submitted,

A handwritten signature in black ink that reads "Anne Smart".

Anne Smart
Director, Government Relations and Regulatory Affairs
ChargePoint, Inc.
254 East Hacienda Avenue
Campbell, CA 95008
Phone: 408-858-5076
Email: anne.smart@chargepoint.com

**BEFORE THE OREGON PUBLIC UTILITY COMMISSION
COMMENTS OF CHARGEPOINT, INC**

In the Matter of Rulemaking)
to Prescribe Application Requirements)
for Transportation Electrification Programs)
_____)

Docket No. AR 599

ChargePoint’s Comments on AR 599 Proposed Rules

ChargePoint, Inc (“ChargePoint”) appreciates the opportunity to provide these comments on the Oregon Public Utility Commission’s proposed rules to implement Section 20 of Senate Bill 1547 on Transportation Electrification Programs. ChargePoint has been an active participant in the informal stakeholder process in this docket and has likewise appreciated the efforts of Staff and the other parties who contributed to crafting the proposed rules.

Introduction and Purpose

Founded in 2007, ChargePoint is the world’s largest and most open electric vehicle charging network with nearly 30,000 charging locations, including 362 charging locations in Oregon. ChargePoint designs, develops, sells and deploys Level 2 and DC fast charging (DCFC) electric vehicle charging stations, software applications and data analytics aimed at creating successful, scalable, and grid-friendly EV service equipment (EVSE).

Figure 1. ChargePoint Charging Locations in Oregon



These charging locations have enabled thousands of drivers in Oregon to fuel their electric vehicles. Our customers in the state include residents, apartments, workplaces, retailers, cities, schools and hospitals. We have also partnered with BMW and Volkswagen to deploy a corridor of independently-owned DC fast chargers along I-5, including many located at [Fred Meyers](#) stores. In addition to selling directly to private companies and homeowners, ChargePoint partners with local companies Rexel Electrical Supplies and Christenson Electric Inc.

For ease of use, we have organized these comments to correspond with the four substantive subsections of the proposed rules (ChargePoint has no comments on the introductory Scope and

Applicability of Rules subsection). For many provisions, ChargePoint supports the language of the rules as proposed. In such cases, we provide comments in order to provide additional background to the Commission on the record and to explain our support for retaining the language currently proposed for those provisions.

Definitions (860-087-0010)

ChargePoint supports the language of the Definitions subsection as proposed. The respective definitions of “Transportation Electrification Plan” and “Transportation Electrification Program” are helpful clarifications of these terms and the procedural mechanisms by which the Commission will supervise electric utilities’ efforts pursuant to SB 1547. ChargePoint recommends retaining these definitions as proposed.

Transportation Electrification Plan (860-087-0020)

ChargePoint largely supports the proposed rule language describing the requirements of a Transportation Electrification Plan in Section 860-087-0020. ChargePoint concurs that it is important for each utility to file such an overview document that explains how the Transportation Electrification Programs it proposes will meet the goals and requirements of SB 1547.

Current Condition of the Market (subsection (1)(b)):

ChargePoint agrees that it will be necessary for a utility to assess the current condition of the transportation electrification market in the utility’s service territory, as would be required by subsection (1)(b), in order for the Commission to evaluate the success of the utility’s approved programs. This assessment is necessary to evaluate the potential infrastructure needs of current and future EV drivers. The growth of this sector in recent years has been tremendously exciting and ChargePoint looks forward to its continued growth and transformation for the benefit of consumers, businesses, the environment, and society as a whole.

Though we recognize that this assessment is necessary for guiding the size and scope of utility programs, ChargePoint cautions the Commission against placing exclusive responsibility for this continued transformation of transportation electrification on the utilities. Each stakeholder, including the utilities and competitive providers such as ChargePoint, has a role to play in helping to achieve Oregon’s stated policy goals for transportation electrification. Through its review and acknowledgment of each utility’s Transportation Electrification Plan, the Commission can ensure that these goals are achieved in the most effective and efficient way possible by relying on each stakeholder’s expertise. We will comment on the proposed rules’ requirements regarding coordination with other market actors in the next section of our comments.

Discussion of Current Market Barriers (subsection (1)(d)):

ChargePoint supports the proposed rules’ requirement in subsection (1)(d) that each utility’s Transportation Electrification Plan include a discussion of current market barriers to adoption of

electric transportation options in Oregon. However, we believe this rule should go further. In order to make efficient use of the capabilities and expertise of the competitive market, each utility should also be required to discuss how its proposed plan is designed to target these current market barriers in a cost-effective manner. Utilities should survey the current state of the market and identify specific barriers where utility involvement is most needed.

For example, ChargePoint believes that the barriers to EVs are higher in low-income communities and that utility incentives should be tailored to these communities in recognition of the significant obstacles that these communities face. Multifamily housing is likewise an underpenetrated market where utility support is needed more than in other markets. The utilities' applications will more effectively accelerate transportation electrification if they contain the specificity needed for the Commission to ensure that the programs are designed to meet the varying needs of different communities and customer types.

ChargePoint recommends that subsection (1)(d) of 860-087-0020 be modified to read as follows:

“A discussion of current market barriers and how the electric company’s Transportation Electrification Plan is designed to overcome these market barriers in a cost-effective manner.”

Innovation, Competition, and Customer Choice (subsection (1)(e)):

ChargePoint applauds and strongly supports the proposed rules' requirement that Transportation Electrification Plans discuss how the Plan “will stimulate innovation, competition, and customer choice,” as required by Section 20, Subsection (4)(f) of SB 1547. We recommend that subsection (1)(e) of the proposed rules be retained in the final rules, and provide these comments to explain why these criteria are so important.

In addition to innovation, competition, and customer choice, Section 20, Subsection (4) of SB 1547 lists five other criteria that the Commission must consider when evaluating a Transportation Electrification Program. Because utilities always want to be able to recover their costs and always prefer to operate an efficient and flexible electric grid, ChargePoint submits that the utilities will be motivated to satisfy criteria (a) through (e) for their own reasons, independent of the fact that they are required by SB 1547. As a result, ChargePoint recommends that the Commission pay particular attention to innovation, competition, and customer choice, in evaluating utilities' applications.

Innovation

Utilities should promote innovation by limiting “picking winners” and allowing for new technologies and business models to thrive. ChargePoint recommends at a minimum, if the utility is qualifying equipment and vendors, then qualification should be “rolling” to allow new products and new vendors to join the program while it is underway. If utility programs are effectively promoting innovation, competition, and customer choice, it is likely that companies that currently don't sell into the Oregon market will seek to come into this state. This is good for the market and for the local economy. New software updates, changes in technology appearance, equipment

features and other elements of products are also evolving much more rapidly than a traditional utility procurement cycle. In order to ensure that drivers (and ratepayers) have access to the latest technology, the vendor and equipment qualification should be left open. Puget Sound Energy¹, San Diego Gas and Electric², and Southern California Edison³ have all created rolling vendor qualification processes in their respect EV charging station programs.

Competition

ChargePoint welcomes a role for utilities in the EV charging market. The issue of competition is not simply competition between utilities and EV charging station vendors directly; continued competition within the EV charging industry is needed in order to promote innovation, drive down prices, and grow a sustainable and vibrant market. Utilities should promote competition by including multiple vendors, products, and business models into their programs. This will keep a level playing field in the market. The charging station industry is rapidly evolving and it is premature for a utility to force a selection of a “winner” by restricting program qualification or an RFP to one technology or one vendor.

Customer Choice

The site host, not the utility, should ultimately choose the equipment and services installed on their own property, regardless of which entity owns the equipment. It is important the site host have the ability to decide the equipment, network, and pricing to drivers that makes the most sense for that unique site. For example, the charging behavior for drivers at retail locations is different from that for a resident at an apartment complex. The site host has the relationship with their employees, customers, residents, or visitors that makes them uniquely qualified to determine what equipment and services should be offered. The site host, not the utility, is also better positioned to manage parking behavior and ensure that charging infrastructure is utilized by charging vehicles rather than blocked by cars not actively charging.

It is also important to continue to allow EV charging vendors to compete with each other in a sales process to be the site host’s preferred vendor, even if the utility ultimately owns the charging station installed at that site. Vendors such as ChargePoint need to hear directly from customers about what needs they have and how they can improve their products. Customer choice drives our ability to continue to innovate, drive down costs, and come up with better products and services.

Fortunately, innovation, competition, and customer choice are all mutually supportive goals – as long as customers, namely the EVSE site hosts, have freedom of choice among providers of

¹ Puget Sound Energy, Electric vehicle charger rebate:

http://www.pse.com/savingsandenergycenter/AlternativeFuelVehicles/Pages/Electric-vehicles.aspx?utm_source=shorturl&utm_medium=webpage&utm_campaign=electricvehicles&WT.mc_id=1069.

² California Public Utilities Commission, February 4, 2016. Decision Regarding Underlying Vehicle Grid Integration Application and Motion to Adopt Settlement Agreement (Decision 16-01-045).

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M158/K241/158241020.PDF>

³ California Public Utilities Commission, January 25, 2016. Decision Regarding Southern California Edison Company’s Application for Charge Ready and Market Education Programs (Decision 16-01-023).

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M157/K835/157835660.PDF>

charging infrastructure, the market will ensure that customers receive the benefits of competition and innovation. Protecting and ensuring customer choice will also further the Legislative Assembly's goal to provide "consumers with increased options, ... attract private capital investments and create high quality jobs" in Oregon (see SB 1547, Section (20)(2)(d)).

Accordingly, ChargePoint recommends that the Commission evaluate the success of the utilities' programs based in part on the diversity of charging product offerings, the number of vendors providing charging equipment, whether the market has continued to innovate, and whether competition has continued to drive affordability and access for customers.

Support for Grid Efficiency and Flexibility (subsection (1)(f)):

ChargePoint supports the proposed rule language in subsection (1)(f) requiring a discussion of how a utility's Transportation Electrification Plan will support grid efficiency and flexibility, including the ability to integrate renewable energy resources (referred to in the rule as "variable generating resources"). This criterion is contemplated by SB 1547 (Section 20(4)(e)), so it makes sense for the utilities to explain how both their proposed Transportation Electrification Programs and their Plan as a whole will account for these benefits from increasing electric transportation options. Increased grid efficiency, flexibility, and ability to integrate renewable energy should be considered significant benefits for the utilities and their ratepayers when the Commission evaluates the merits of proposed programs.

Plans to Be Updated Every Two Years Concurrently with Smart Grid Reports (subsection (3)):

ChargePoint supports the requirement of subsection (3) that utilities be required to update their Transportation Electrification Plans every two years. Two years is a reasonable balance that will allow utilities to learn from their experience implementing their approved programs and provide adequate opportunity to modify programs and introduce new programs in subsequent plans.

ChargePoint does not take issue with requiring Transportation Electrification Plans to be filed concurrently with a utility's Smart Grid Report. However, the rules are unclear as to whether this requirement is merely a timing issue, or if the Transportation Electrification Plans will be included as a part of a utility's Smart Grid Report. While we appreciate that both the utilities and the Commission strive for administrative efficiency and reducing regulatory burdens where possible, ChargePoint fails to understand the relationship between a Transportation Electrification Plan and a Smart Grid Report. If the intent of this rule is merely to specify the timing of a Transportation Electrification Plan, ChargePoint takes no issue but encourages the Commission to clarify the rule to this effect.

However, if the intent of the rule is that a Transportation Electrification Plan will be one part of a larger Smart Grid Report, then ChargePoint recommends that the substance of this proposed rule be changed. From ChargePoint's perspective, there does not seem to be meaningful overlap between these two filings that would justify evaluating them together. ChargePoint will most likely comment on each utility's Transportation Electrification Plan, but would not have much to say regarding a Smart Grid Report; and similarly, we would expect that parties who are interested in a

Smart Grid report would not have much to say about a proposed Transportation Electrification Plan.

ChargePoint respectfully submits that transportation electrification plans deserve their own docket and that giving these plans such attention will not unduly burden the Commission.

ChargePoint recommends that subsection (3) be modified to read as follows:

“An electric company must update its Transportation Electrification Program every two years. Transportation Electrification Plan updates are to be filed concurrently with, but will be evaluated separately from, the electric company’s Smart Grid Report.”

Relationship to Integrated Resource Plan (subsection (5)):

Similar to our concerns that Transportation Electrification Plans be filed concurrently with Smart Grid Reports, ChargePoint is concerned that subsection (5) will require us to become involved in a utility’s Integrated Resource Plan (IRP) proceeding, which, as the Commission well knows, are long and complex proceedings. The Commission, of course, has discretion to direct utilities to include certain information in its IRP if it finds that such information is necessary to evaluating the IRP, so we do not recommend changing the proposed language of subsection (5).

However, we encourage the Commission to require utilities to reflect forecasted increases in load and grid management capabilities that will result from transportation electrification in their IRPs, and to require utilities to plan accordingly for these changes. We encourage the Commission to allow the utilities to leave the details of Transportation Electrification Program design to a separate docket.

Transportation Electrification Programs (860-087-0030)

ChargePoint also largely supports the proposed requirements for a utility’s application for approval of a Transportation Electrification Program, found in Section 860-087-0030 of the proposed rules.

Description of the Program (subsection (1)(a)):

ChargePoint believes that the description of a proposed program required by subsection (1)(a) of this section will provide the Commission and interested parties with sufficient detail to evaluate the merits of pursuing a proposed Transportation Electrification Program. Such detail will also allow the Commission and interested parties to evaluate whether a completed program was carried out according to plan and in a prudent manner.

When the Commission evaluates proposed programs in a utility application, and when it later evaluates executed programs for purposes of cost recovery, ChargePoint encourages the Commission to take an expansive view of what it means for a program to be a “success.” For example, the number of new electric vehicles (EVs) in Oregon at the conclusion of a program should be seen as an important but ultimately limited metric for success. It is important to

remember that the turnover time for passenger vehicles is approximately ten years, so transportation electrification will take some time. Accordingly, the Commission should expect the utilities to demonstrate in their applications how their proposed programs will create a sustainable foundation for the continued growth of EVs, the growth of the EV charging industry, and the growth of other forms of electric-powered transportation in Oregon. Programs should be “future proof” to ensure that the EVSE and other infrastructure deployed through the programs remain useful for years to come.

For the purposes of the rules, taking an expansive view of program success means that the Commission should evaluate ongoing or completed programs by referring *not* to external metrics (such as the number of EVs in a utility’s service territory) but to the detailed program description itself that the utility provides pursuant to these rules. In other words, if the Commission approves a program, the utility should be assured of cost recovery if it implements the program according to the detailed program description required by the rules.

Utility Ownership and EVSE Ownership Structure (subsections (1)(a)(G) and (1)(a)(I)):

ChargePoint supports the requirements in in subsections (1)(a)(G) and (1)(a)(I) of the proposed rules that a utility’s program description specify whether the utility would be owning or supporting charging infrastructure, as well as include a discussion of ownership structure.

We provide these comments to call attention to the fact that program descriptions under the proposed rules must also, according to subsection (1)(g), explain how the programs meet the requirements SB 1547, Section 4. Among these specific requirements of SB 1547 is that the utility’s investments and expenditures “are reasonably expected to stimulate innovation, competition and customer choice in electric vehicle charging and related infrastructure and services.”

ChargePoint acknowledges that an EVSE program in which the utility owns the EVSE can also stimulate innovation, competition, and customer choice, but cautions that not all utility ownership programs can simultaneously achieve all of these goals. For example, a program in which a utility purchases all of the charging stations needed for a program from a single vendor and installs them free of charge for private “site hosts” would stifle innovation and would remove any possibility of customer choice. Further, such a program would stifle innovation as competing vendors would leave the service territory rather than compete against the utility program. By contrast, a program in which site hosts were able to choose from a list of approved charging station vendors would stimulate innovation, competition, and customer choice, while allowing for the possibility of utility ownership. As mentioned earlier, in such a scenario, it is crucial that utilities qualify EVSE and EVSE vendors for their programs on a rolling basis and avoid picking winners.

Interoperability and National Standards for Measurement and Communication (subsection (1)(a)(J) and (1)(a)(K)):

In order to create a sustainable, long-lasting foundation for electric transportation, it is crucial that utilities’ Transportation Electrification Programs rely on national standards for interoperability, measurement and communication. As with other elements of the program design, it is important

to remember that EV drivers do not only drive in one utility territory or even one state. All standards referenced in the Transportation Electrification Programs should be developed and maintained by a national standards making body. Misinformation currently exists in the market on interoperability standards pushed by pay-to-play organizations. Any standards considered should come from an ANSI accredited Standards Development Organization (SDO) such as IEEE, NEMA, NFPA, SAE International, et. al.

As an active participant in multiple ANSI member SDOs, ChargePoint looks forward to partnering with Oregon's utilities to help them ensure that their Transportation Electrification Programs conform to established and emerging national communication and interoperability standards.

ChargePoint supports the entirety of subsection (1)(a) of the proposed rules as drafted, because the detail the utilities will be required to provide in their applications for Transportation Electrification Programs will allow the Commission, as well as other interested parties, to fully vet and evaluate the proposed programs according to the applicable criteria and the public interest.

Program Coordination Efforts (subsection (1)(c)):

ChargePoint believes that utility engagement with stakeholders is essential for utilities to develop effective programs to accelerate transportation electrification. By engaging stakeholders early in the process, it is more likely that the utilities will submit applications that can be supported by stakeholders and expeditiously approved by the Commission. ChargePoint and other market players, along with advocacy groups, have been involved in numerous efforts on transportation electrification in other states. This experience and expertise are valuable resources that Oregon's utilities should make use of when developing programs to accelerate transportation electrification in Oregon to ensure strong and viable deployments. Coordination with market actors will also be essential for utilities to ensure that their Transportation Electrification Programs stimulate innovation, competition, and customer choice.

ChargePoint supports the proposed rule language in subsection (1)(c) regarding program coordination efforts required by the utilities.

Program Benefits (subsection (1)(e)):

ChargePoint encourages the Commission to take an expansive view of the types of benefits that can be attributed to utilities' Transportation Electrification Programs, including ratepayer benefits, utility benefits, environmental benefits, and economic development benefits. As discussed earlier, due to the turnover time of the vehicle fleet, it will take time to fully realize some of the benefits of these programs. The Commission should approve programs that can be reasonably expected to produce benefits, but should not punish the utilities – through denying cost recovery or other measures – if those benefits do not immediately materialize.

ChargePoint also reminds the Commission that one benefit that can be expected from transportation electrification is increased sales for electric utilities. These increased sales will, of course, benefit the utilities, but they are also likely to benefit ratepayers by deferring the need for

rate increases. We point this out because it is important to remember that, even if some ratepayers never purchase an EV and never use the EVSE infrastructure that is deployed as a result of their utility's Transportation Electrification Programs, they will still benefit from the programs. In addition to deferred rate increases, all ratepayers will also enjoy the benefits of increased renewables and a more flexible grid.

ChargePoint supports the proposed rule language in subsection (1)(e) regarding program benefits.

Program Evaluation (subsection (1)(f)):

ChargePoint supports the fact that the proposed rules in subsection (1)(f) provide the utilities with flexibility to propose a variety of evaluation mechanisms. We recognize the importance of evaluating utility programs to ensure that they are carried out in an effective and prudent manner. However, ChargePoint is concerned that program evaluations might rely on the evaluation methodologies developed in the context of energy efficiency programs, also known as demand-side management (DSM) or conservation programs. First, energy efficiency program evaluations generally rely on third-party evaluators, who are expensive and may not be necessary in the context of Transportation Electrification Programs. If a third-party evaluator is deemed necessary, ChargePoint submits that it would be sufficient for the utility to use a third-party to evaluate only one or two programs as a sample, rather than a comprehensive evaluation of every program.

Second, an energy efficiency program is generally evaluated on its cost-effectiveness so that the Commission can determine whether the utility should continue offering that particular program. By contrast, SB 1547 establishes different criteria for cost-recovery in subsection (4). These criteria are focused on prudence, the used-and-useful standard, benefits to the grid, and whether the program stimulates innovation, competition, and customer choice. ChargePoint believes that the Commission should consider the cost-effectiveness of each utility program proposal up-front when it evaluates the utilities' applications – along with these other criteria – and not after-the-fact. If a utility program satisfies each of the criteria listed SB 1547, the utility should be allowed to recover the pre-approved cost of the program. The utilities should not be at risk of not recovering their costs based on the results of a third-party evaluation.

Rather than a third-party evaluator or a DSM-type cost-effectiveness evaluation, a utility could, for example, propose caps for the total amount of money it would spend on rebates, on infrastructure investments, and on program administration and ask the Commission to approve all expenditures up to the specified spending cap. Such an arrangement would ensure that ratepayers will not be on the hook for cost overruns, while allowing the utilities to begin executing on their programs without worrying about not being able to later recover the programs' costs.

ChargePoint supports the proposed rule language in subsection (1)(f).

Addressing Criteria of SB 1547 (subsection (1)(g)):

ChargePoint strongly supports the proposed rule language in subsection (1)(g), which requires utilities to address the criteria listed in Section 20, paragraphs 4(a)-(f), of SB 1547 (codified at Oregon Laws 2016, chapter 028, section 20(4)(a)-(f)). As the Commission knows, the Commission

is required by statute to consider these criteria when considering both whether to approve a Transportation Electrification Program, and whether to approve cost recovery for a Transportation Electrification Program.

As mentioned earlier, ChargePoint expects that utilities will be motivated to develop Transportation Electrification Programs that satisfy the criteria listed in paragraphs 4(a)-(e) for their own reasons, both to demonstrate that the program expenditures should be recoverable in rates and to ensure the safety, reliability, and flexibility of their grids. As a result, ChargePoint believes it will be especially important for the Commission to ensure that a proposed program is “reasonably expected to stimulate innovation, competition and customer choice in electric vehicle charging and related infrastructure and services,” as required by Section 20(4)(f) of SB 1547. Utilities will certainly be able to benefit themselves by developing programs that stimulate innovation, competition, and customer choice, but they may not be intrinsically motivated to do so in the absence of this statutory requirement.

Program Applications Outside of Plans (subsection (3)):

ChargePoint supports the proposed rule language in subsection (3) that will allow utilities to submit applications for a Transportation Electrification Program that was not included in its original Transportation Electrification Plan or update to its Plan. Utilities should be allowed flexibility to adapt to changing market conditions and to take advantage of market opportunities as they become available. An application for a program outside of a Plan will still be subject to all of the applicable requirements of the rules.

Reporting Requirements (860-087-0040)

ChargePoint largely supports the proposed language in the Reporting Requirements section of the proposed rules.

As discussed earlier, ChargePoint encourages the Commission to take an expansive view of what constitutes success for a Transportation Electrification Program, and to remember that all of the benefits of a program will not be realized immediately. To that end, ChargePoint is concerned that the proposed rules in this section assume that all potential benefits of a program will have been achieved at the time that the program “ends.”

A utility program that provides rebates for the purchase of charging stations, for example, may last only five years or so, whereas the useful life of the charging stations that the program helped to deploy may be 10 years. Many of these charging stations may see relatively low utilization rates for the first several years after they are installed, but approach 100 percent utilization later on. Since it will take time for the full benefits of EVSE infrastructure to be realized, utilities should report on – and receive acknowledgment for – the benefits that their Transportation Electrification Programs create even after their active involvement in the programs has concluded. Further, the attach rate or number of vehicles attributed to each commercial station is 5:1. Therefore, the utility may not see the increased load at stations installed as part of their program, rather, most the

charging of the vehicle that can be attributed to the program may take place at home and not tracked by the utility, however, still billed by the utility.

In other words, utility Transportation Electrification Programs should be evaluated based on the benefits that they can be expected to provide over the life of the infrastructure deployed through the programs, not merely over the life of the program itself. To this end, ChargePoint recommends two changes to this section of the proposed rules.

First, ChargePoint recommends that subsection (1)(g) be modified to read as follows: “Updated market data, including a description of changes in the condition of the transportation electrification market that have occurred as a result of the program and that can reasonably be expected to occur in the future as a result of the program within the electric company’s service territory.”

Second, ChargePoint recommends that subsection (1)(h) be modified to read as follows: “An evaluation of how the program has, and can reasonably be expected to continue to.” To accommodate this grammatical change, we further recommend that the verbs in the three subsections (h)(A), (h)(B), and (h)(C) be changed to present tense (i.e., “accelerate,” “stimulate,” and “support,” respectively).

Conclusion

ChargePoint has appreciated the productive stakeholder process that led to these proposed rules, which we largely support. We also appreciate the opportunity to provide these comments and look forward to continue being involved in Oregon’s efforts to accelerate transportation electrification. ChargePoint welcomes questions from the Commission and other stakeholders in advance of the comment deadline of September 9, 2016.

Dated: August 19, 2016

Respectfully submitted,



Anne Smart
Director, Government Relations and Regulatory Affairs
ChargePoint, Inc.
254 East Hacienda Avenue
Campbell, CA 95008
Phone: 408-841-4522
Email: anne.smart@chargepoint.com