



Comments of Smart Grid Oregon
on
UM 1461
Investigation into Electric Vehicle Charging Rates and Infrastructures

Smart Grid Oregon (SGO) is a trade association of companies, organizations, and institutions that promotes efforts to modernize the power grid to make transmission and delivery of electricity efficient, stable, and responsive to the needs of consumers, utilities, and other stakeholders in the system. The thirty-two members of SGO include utilities, technology companies, consumer organizations, and research institutions. SGO seeks to help the existing power system evolve into a more robust and technologically advanced Smart Grid, and assist regulatory authorities in crafting policies that will make Oregon a leader in this field.

The trend toward electrification of transportation will bring about important changes in future transportation systems, as well as pose new challenges for future power systems. As a result it is important to encourage policies designed to support emerging electric vehicles (EVs) and related infrastructure, provide robust power systems to handle future needs, discourage use of electricity during peak periods, and protect the environment through continued integration of clean renewable energy into the grid.

We are pleased the Commission is addressing policies that begin to deal with the challenges posed by transformation in the transportation system. At this late stage of the EV docket proceedings, SGO only wishes to provide input on issues under consideration which it considers of strategic value to the overarching goals of the docket.

We believe the primary purpose behind any policy decisions the Commission makes should be to enhance consumer choice at a time when the market is emerging and many questions remain, while at the same time providing an environment which best cultivates open competition between interested stakeholders. SGO encourages policies which promote competitive neutrality and consumer choice, recognizing that this is an emerging market with many players and where policy will ultimately require ongoing flexibility in responding to consumer behavior and future data.

Specifically, on the issue of how best to design initial rate guidelines which respond to these purposes, and which necessarily incentivize off-peak EV charging, we believe staff's rate options present a fair appraisal of the choices facing the Commission. Of these options, SGO supports Option 4, as discussed in Appendix A of Staff's Responses to the Commissioners' Bench Request, since it allows all EV customers choice regarding opting-in to time of use (TOU) rates for whole premises, separate EV TOU rates, or the existing status quo rates. While we are confident some form of TOU-related charging will become accepted by consumers as they become educated as to its advantages, we believe that it is important to avoid being overly-prescriptive during the early stages of EV adoption. We consider Option 4 as most recognizing consumer choice and allowing the evolution of charging station infrastructure, including the development of separate or embedded meter systems, and should be supported as the preliminary rate guideline while the impacts are assessed in the near term.

SGO thanks the Commission for consideration of these comments. We encourage the development of future policy research to address upcoming changes in the transportation system, as well as efforts to help Oregon's power system best meet future needs.

Dated at Portland, Oregon, this 30th day of March, 2011.

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