

August 19, 2016

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: AR 599—PacifiCorp’s Comments in the Rulemaking to Prescribe Application Requirements for Transportation Electrification Programs

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) appreciates the opportunity to provide comments in the above-referenced rulemaking. The Company provides the following comments pertaining to the draft rules served on July 13, 2016.

Included as Attachment A is a red-lined version of the Company’s proposed changes to the draft rules. An explanatory narrative of these proposed changes and the Company’s comments follow below.

Draft rule	Explanation of Substantive Changes and/or General Comments
860-087-0010(2)	Use of “plan” is less ambiguous than the term “framework”.
860-087-0020(1)(a)	The proposed replacement terms are more appropriate for describing all transportation electrification plans, not just the initial plan.
860-087-0020(1)(c) and (e)	Changed language to be consistent with 860-087-0020(1)(f)
860-087-0030(1)(a)(E)	PacifiCorp assumes “utilization” as used in this provision is intended to refer charging infrastructure. The Company recommends clarifying to avoid potential ambiguity. Addition of “any” clarifies that incentives may only apply to certain programs.
860-087-0030(1)(a)(K)	The Company suggests clarifying the meaning of national standards for “measurement” and “communication”
860-087-0030(1)(g)	The proposed replacement terms more closely match the language in SB 1547.
860-087-0030(2)	Clarifying language to allow for utilities to file more than program.
860-087-0030(3)	Clarifying language to be consistent with the Company’s proposed changes to 860-087-0020(1)(a)

860-087-0040(1)(c)	Removed language referring to program portfolio, as it appears the results reports will be filed for each program.
860-087-0040(1)(h)(A) through (C)	The Company notes that it will be difficult to conclusively evaluate that the objectives in (A) through (C) have been achieved.

The Company appreciates the opportunity to file these comments and looks forward to actively participating in further rulemaking proceedings. Please address any questions to Natasha Siores at 503-813-6583.

Sincerely,



R. Bryce Dalley
Vice President, Regulation

Enclosure

Attachment A:

**PacifiCorp's Suggested Edits
to AR 599 Draft Rules – Red-lined**

DIVISION 087
TRANSPORTATION ELECTRIFICATION PROGRAMS

860-087-0001

Scope and Applicability of Rules

(1) The rules in this division prescribe the application requirements for programs to accelerate transportation electrification filed by an electric company.

(2) Upon request or its own motion, the Commission may waive any of the rules in this division for good cause shown. A request for waiver must be made in writing, unless otherwise allowed by the Commission.

860-087-0010

Definitions

For the purpose of this division:

(1) "Electric company" means an electric company as defined in ORS 757.600.

(2) "Transportation Electrification Plan" means an overview document that outlines the electric company's long-term ~~transportation electrification framework plan~~ to accelerate transportation electrification.

(3) "Transportation Electrification Program" means a program proposed by an electric company to accelerate transportation electrification.

860-087-0020

Transportation Electrification Plan

An electric company must file a Transportation Electrification Plan.

(1) The Transportation Electrification Plan must include:

(a) Plan ~~goals-objectives~~ and summary of ~~proposed Transportation Electrification Programs~~ planned initiatives to meet these ~~goals/objectives~~;

(b) Current condition of the transportation electrification market in the electric company's service territory;

(c) A discussion of how the Transportation Electrification Plan is expected to accelerates transportation electrification;

(d) A discussion of current market barriers;

(e) A discussion of how the Transportation Electrification Plan is expected to ~~will~~ stimulate innovation, competition, and customer choice;

(f) A discussion of how the Transportation Electrification Plan is expected to support electrical system efficiency and operational flexibility, including the ability of the electric company to integrate variable generating resources; and

(g) A discussion of electric company system impacts expected from implementation of the Transportation Electrification Plan and underlying programs.

(2) An electric company must file its first Transportation Electrification Plan concurrent with its first application for Transportation Electrification Programs on or before December 31, 2016.

(3) An electric company must update its Transportation Electrification Plan every two years. Transportation Electrification Plan updates are to be filed concurrently with the electric company's Smart Grid Report.

(4) The Commission will evaluate an electric company's Transportation Electrification Plan for Commission acknowledgement.

(5) The Commission may, upon assessment of resource size and system impact, direct an electric company to incorporate the Transportation Electrification Plan or certain Transportation Electrification Programs identified in an electric company's Plan into the electric company's Integrated Resource Plan.

860-087-0030

Transportation Electrification Program

An electric company must file applications for programs to accelerate transportation electrification.

(1) A Transportation Electrification Program must include:

(a) A description of the program that includes, but is not limited to:

(A) Program elements, objectives, timeline, and expected outcomes;

(B) Market baseline assumptions;

(C) Major performance milestones;

(D) Where applicable, a description of program phases, including a proposal for when each subsequent program phase will be submitted for Commission review;

(E) Expected utilization, participation eligibility, and any incentive structures;

(F) Identification of market barriers, program implementation barriers, and program strategies to overcome the identified barriers;

(G) Description of the electric company's role and, if applicable, a discussion of how the electric company proposes to own or support charging infrastructure, billing services, metering, or customer information;

(H) Whether transportation electrification adoption attributed to the program will likely necessitate distribution system upgrades;

(I) Where applicable, a discussion of ownership structure;

(J) Where applicable, a discussion addressing interoperability of invested equipment;

(K) Where applicable, a discussion of any national standards for measurement and communication; and

(L) Any other information requested by the Commission.

(b) ~~Any~~ Data used to support the descriptions provided in paragraphs (l)(a)(A)-(L) of this rule.

(c) A description of program coordination that includes a description of:

(A) Stakeholder involvement in program development;

~~(B)~~ Efforts to coordinate with related state programs;

(C) Coordination, if any, of delivery with other market actors and activities, and how the market and other market actors can leverage the underlying program or projects within the program.

(d) A description of program costs that includes, but is not limited to:

(A) Estimated total program costs, including incentives, program delivery, evaluation, marketing, and administration costs;

(B) Estimated participant costs;

(C) How the electric company proposes to recover costs; and

(D) Any other information requested by the Commission.

(e) A description of the estimated expected program benefits that includes, but is not limited to:

- (A) Program benefits, including to whom and when benefits are accrued;
- (B) Electrical system benefits; and
- (C) A discussion of how a net benefit to ratepayers is attainable.

(f) A description of how the electric company will evaluate the program that includes, but is not limited to:

- (A) Timeline of program evaluation and proposed evaluation reporting schedule;
- (B) Estimated cost of evaluation;
- (C) How the evaluation will be conducted and whether third-party evaluation is necessary;
- (D) How the evaluation will address identified barriers; and
- (E) A discussion of the method of data collection that is consistent with subsection (1)(b) of this rule and how the data will be used to evaluate the effectiveness of the program.

(F) Any other evaluative information requested by the Commission.

(g) A ~~detailed~~-description of how the program addresses the criteria in Oregon Laws 2016, chapter 028, section 20(4)(a)-(f) that the Commission shall must consider when reviewingconsidering Transportation Electrification Program applications.

(2) An electric company must file ~~itsan~~ application for a Transportation Electrification Program or Programs on or before December 31, 2016.

(3) An electric company may submit an application for approval of a Transportation Electrification Program that is not included in its Transportation Electrification Plan or Plan update upon demonstration that the proposed program ~~addresses the framework and Goals~~supports the objectives outlined in the electric company's acknowledged Plan.

860-087-0040

Reporting Requirements

(1) An electric company must report the results of its evaluation for each Transportation Electrification Program approved by the Commission. A program evaluation must include, but is not limited to:

- (a) As applicable, tThe information required under OAR 860-087-0030(1)f(A)-(F);
- (b) An assessment of program costs and benefits realized by ratepayers and the electric company;
- (c) A tracking of program ~~and program portfolio~~-costs over the life of the program ~~and program portfolio~~;
- (d) Progress against identified market barriers and implementation barriers;
- (e) Current risk that investment will result in stranded costs;
- (f) Whether any program modifications are recommended to help meet expected outcomes;
- (g) Updated market data, including a description of changes in the condition of the transportation electrification market within the electric company's service territory; and
- (h) An evaluation of how-whether the program has:
 - (A) Accelerated transportation electrification;
 - (B) Stimulated innovation, competition, and customer choice; and
 - (C) Supported system efficiency and operational flexibility, including the ability to integrate variable resources.

(2) The Commission may request additional program updates, including milestones and progress against success indicators, to assess whether to continue, discontinue, or modify approved Transportation Electrification Programs.