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**VIA ELECTRONIC FILING**

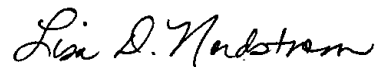
Attention: Filing Center  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97308-1088

Re: Docket No. AR 609  
Transportation Electrification Plans – Idaho Power Company’s Comments  
on Draft Rules

Dear Filing Center:

Idaho Power Company (“Idaho Power”) herewith transmits for electronic filing comments on Staff’s draft proposed rules in the above-referenced rulemaking. Idaho Power appreciates the opportunity to suggest a few rule language clarifications for consideration. Please direct any substantive questions regarding this filing to Regulatory Analyst Nicole Blackwell at (208) 388-5764 or [nblackwell@idahopower.com](mailto:nblackwell@idahopower.com).

Sincerely,



Lisa D. Nordstrom

LDN:csb  
Attachment

**DIVISION 087**

**TRANSPORTATION ELECTRIFICATION PROGRAMS**

**860-087-0020**

**Transportation Electrification Plan**

(1) This rule prescribes the required elements of an electric company's Transportation Electrification Plan (TE Plan), which contains the electric company's long-term strategy to accelerate transportation electrification in its Oregon service territory. The objective of the TE Plan is to:

(a) Integrate all of the electric company's TE actions into one document. This includes, but is not limited to, analyzing the electric company's portfolio of near-term and long-term transportation electrification actions, including approved program(s), future transportation electrification actions, and other transportation electrification involvement such as Clean Fuels programs.

(b) Identify a portfolio of actions, which may include investment, rate design, programs, and services reasonably calculated to accelerate transportation electrification, in an effective and efficient manner. The TE Plan should seek to address areas most hampered by market barriers in the electric company's service territory.

(2) An electric company must file for Commission approval of a TE Plan.

(a) As used in this rule, "approval" means the Commission finds that the TE Plan meets the criteria and requirements of this rule and does not constitute any determination on the prudence of the individual programs discussed in the TE plan. Conversely, lack of approval means that the TE Plan does not meet the criteria or requirements of the rule.

(b) An electric company must file for Commission approval of its TE Plan within two years of its previous TE Plan approval order or as otherwise directed by the Commission.

(c) The electric company must present its TE Plan to the Commission at a public meeting prior to the deadline for written public comment.

(d) The Commission will hold a scheduling conference after the TE Plan is filed. The schedule will provide for comments by parties and reply comments by the electric company.

(e) Commission staff will present its recommendation to the Commission at a public meeting. The Commission will also consider comments and recommendations on an electric company's TE Plan at the public meeting before issuing an order on approval. The Commission may provide direction to an electric company regarding any additional analyses or actions that the electric company should undertake in its next TE Plan.

(f) An electric company is not prohibited from proposing transportation electrification programs on a rolling basis.

**Commented [BN1]:** Please describe what this means in more detail. Outside the proceeding of a TE Plan?

(4) The TE Plan must include:

(a) Current condition of the transportation electrification market in the electric company's Oregon service territory, including, but not limited to:

- (A) A discussion of existing state policies and programs;
- (B) Market barriers;
- (C) Existing data on the availability of public and private charging stations;
- (D) Number of electric vehicles in the utility service territory; and
- (E) Other transportation electrification infrastructure, if applicable;

(b) A summary of the electric company's approved transportation electrification program(s) and future transportation electrification concepts and actions. The TE Plan must incorporate project learnings and any other relevant information gathered from other utility-funded transportation electrification infrastructure investments, programs, and actions in its Oregon service territory to ensure that lessons learned are carried forward;

(c) A discussion of how the utility's TE Plan, investments, programs, and actions accelerate transportation electrification and extend access to low and moderate income groups;

(d) The supporting data and analysis used to develop the TE Plan, which may include, but is not limited to, data and analysis be derived from review of costs and benefits, rate design, energy use and consumption, overlap with other utility programs, customer and electric vehicle user engagement, charging and vehicle technology updates, distribution system impacts, and residential, industrial, commercial, multifamily, and electric vehicle fleet charging considerations.

(e) Where applicable, A discussion of the electric company's potential impact on the competitive electric vehicle supply equipment market, including consideration of alternative transportation electrification ownership and business models, identification of a sustainable role for the electric company in the transportation electrification market, and how the electric company envisions its future market role;

(f) A discussion of whether increased transportation electrification and the electric company's portfolio of actions is likely to impact the current and anticipated electric company's system impacts resulting from increased transportation electrification and the electric company's portfolio of actions, and, if applicable, how the Plan is designed to address these system impacts. This discussion should also include how programs and concepts in the TE Plan relate to the carbon reduction goals of the Clean Fuels Program and other state programs, including expected greenhouse gas emission reductions based on publicly available metrics.

(5) The Commission may direct an electric company to incorporate the TE Plan into the electric company's other planning documents.

**Stat. Auth.: ORS 756.040, 756.060, ORS 757.357**

**Stats. Implemented: ORS 757.357**