

November 2, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: AR 609 Transportation Electrification Plan Rulemaking—PacifiCorp’s Informal Public Comments

As requested by Staff of the Public Utility Commission of Oregon (Commission), PacifiCorp d/b/a Pacific Power respectfully submits these informal, public comments on the draft proposed rules distributed by Staff on October 23, 2018.

The attached redline draft of the proposed rules provide PacifiCorp’s proposed edits.

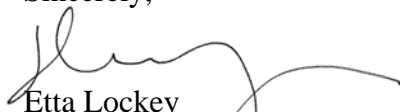
Generally, these edits are intended to make minor clarifying changes and to remove unnecessary detail consistent with Commission direction at the September 25, 2018, public meeting and reflect PacifiCorp’s view that the transportation electrification plan contemplated in the rulemaking should provide a holistic vision of the utility’s approach to accelerate transportation electrification.

Specifically, PacifiCorp highlights proposed changes to the Commission action on utilities’ transportation electrification plans. PacifiCorp proposes that the utilities seek Commission “acceptance” of the plans instead of the currently proposed “approval” of the plans. As described above, PacifiCorp believes the transportation electrification plan should reflect the utility’s grand vision of how to accelerate transportation electrification, without prejudging specific programs, rates, or initiatives that may be proposed at a later date. Thus, Commission “acceptance” better describes the action of evaluating the company’s holistic vision. In addition, “acceptance” of the plans is consistent with the evaluation process involved with electric utilities’ Smart Grid reports. Electric utilities’ Smart Grid reports are completed and reviewed as described in Order No. 12-158; the reports are recommended by Staff for Commission “acceptance,” not “approval.”

PacifiCorp appreciates the opportunity to provide these comments and redline edits and looks forward to continuing its active participation in this proceeding.

Please direct any questions regarding this filing to Natasha Siores at (503) 813-6583.

Sincerely,



Etta Lockey
Vice President, Regulation

Proposed Redlines

OAR 860-087-0020

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 ~~existing and contemplated~~ TE actions into one document. This includes, but is not limited to, ~~analyzing~~ the electric company's portfolio of near-term and longer-term transportation electrification actions, including approved programs, ~~potential~~ 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 ~~that could be~~ reasonably ~~calculated~~ ~~expected~~ 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 ~~acceptance~~ ~~approval~~ of a TE Plan.

(a) As used in this rule, "~~approval~~ ~~acceptance~~" 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~~ ~~actions~~ 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 ~~acceptance~~ ~~approval~~ of its TE Plan within two years of its previous TE Plan ~~approval~~ ~~acceptance~~ 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~~ ~~staff will work with parties to establish a schedule for review of~~ ~~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~~ ~~initiatives~~ on a rolling basis.

(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;~~

Commented [A1]: Not clear what this means

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

(c) A discussion of how the utility's TE Plan, ~~and contemplated~~ investments, programs, and actions may 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 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) 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 current and anticipated electric company system impacts resulting from increased transportation electrification and the electric company's portfolio of actions, and 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.~~

Commented [A2]: Not clear why system impacts and emissions are grouped together here. Maybe should be split into two paragraphs?

(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