



**Portland General Electric Company**

*Legal Department*

*121 SW Salmon Street • 1WTC1301 • Portland, Oregon 97204*

*(503) 464-8858 • Facsimile (503) 464-2200*

*barbara.halle@pge.com*

**Barbara W. Halle**

*Associate General Counsel*

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Via email

[Puc.filingcenter@state.or.us](mailto:Puc.filingcenter@state.or.us)

Public Utility Commission of Oregon

Attn: Nadine Hanhan

201 High St. SE, Suite 100

P. O. Box 1088

Salem, OR 97308-1088

**RE: AR 609 – Comments on Staff’s Proposed Transportation Electrification Draft Rules**

Portland General Electric (PGE) appreciates the opportunity to provide edits and comments on the Transportation Electrification (TE) Plan draft rules proposed by Staff of the Public Utility Commission of Oregon (OPUC or Commission). The rules are intended to provide more detail for the Oregon Administrative Rule 860-087-0020 (TE Plan) as directed by Commission Order No. 16-447 (See AR 599) and authorized in Section 22 of Senate Bill 1547.

In this informal process stage of the rulemaking, PGE provides redlines and comments on the attached Staff’s draft rules provided to the parties on October 23, 2018.

PGE’s edits and comments are intended to modify the rules to provide more flexibility, remove redundancies and simplify the regulatory process for the reporting of TE Plans. We have also made some edits to clarify expectations for the utility based on availability of data and to acknowledge uncertainties about future circumstances.

Included as Attachment A is a red-line version of our proposed changes to the draft rules.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barbara Halle", is written over a light blue horizontal line.

Barbara Halle

Associate General Counsel

Portland General Electric Company

**Attachment A:**  
**PGE's Suggested Edits to**  
**AR 609 Draft Rules – Red-lined**

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 programs, ~~anticipated future~~ transportation electrification actions, and other transportation electrification involvement such as Clean Fuels<sup>1</sup> programs.

**Commented [BH1]:** This insertion is to reflect the idea that actions written in the Plan may need to be changed due to market forces, etc.

(b) Identify a portfolio of actions, which may include investment, rate design, programs, and services ~~reasonably calculated the aim of which is~~ 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.~~

**Commented [BH2]:** This sentence is not needed.

(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) After the TE Plan is filed, the Commission staff will coordinate with the electric utilities to establish a procedural schedule that will provide for comments by parties and reply comments by the electric company. 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.~~

**Commented [BH3]:** PGE suggests simplifying the process by coordinating directly with Commission staff to establish a procedural schedule instead of the Commission holding a scheduling conference.

~~(ed) The electric company will present its TE Plan to the Commission at a public meeting. Commission staff will present its recommendation to the Commission on the electric company's TE Plan at that public meeting. The Commission will also consider comments and recommendations on an electric company's TE Plan received at the public meeting before issuing an order on approval. The Commission may provide direction to an electric company~~

**Commented [BH4]:** PGE is not striking this sentence here, but suggests that this is already covered by the administrative rules and therefore is not needed in this rule.

<sup>1</sup> Clean Fuels program rules are set forth in OAR Chapter 340, Division 253 and compliance is administered by the DEQ. See OPUC Docket UM 1826.

regarding any additional analyses or actions that the Commission would like the electric company ~~should to~~ undertake in its next TE Plan.

**Commented [BH5]:** PGE has modified this language to provide for the possibility of further discussion on these additional analyses or actions.

(~~fe~~) An electric company is not prohibited from proposing transportation electrification programs ~~on a rolling basis at any time.~~

**Commented [BH6]:** PGE suggests making it clearer that electric companies can propose new programs at any time.

(4) The TE Plan must include:

(a) Current condition of the transportation electrification market in the electric company's Oregon service territory, based on data reasonably available and identifiable, including, but not limited to:

**Commented [BH7]:** PGE suggests adding language to clarify that information required under this subsection is data to which electric companies have reasonable access.

- (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 programs 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 to ensure that lessons learned are carried forward;

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

**Commented [BH8]:** The proposed addition is meant to clarify that results will be achieved in the future and the future holds some uncertainty.

(d) The supporting data and analysis used to develop the TE Plan, which may be derived from elements such as: 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.

**Commented [BH9]:** The language is added to provide flexibility with regards to what the source will be for the TE Plan supporting data and analysis.

(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;

**Commented [BH10]:** This language is redundant. The subject is better covered in the last phrase.

(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~~ create system benefits. ~~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 [BH11]:** PGE suggests clarifying the language to reflect that system impacts are not always negative.

**Commented [BH12]:** PGE believes this is covered by the requirement in Section 4(a).

(g) A discussion of anticipated greenhouse gas emission reductions due to TE based on publicly available metrics.

**Commented [BH13]:** PGE thinks this is better covered in its own subsection.

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

**Commented [BH14]:** PGE is not striking this section here, but believes that this is already in the Commission's discretion and therefore is not needed in this rule.

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

**Stats. Implemented: ORS 757.357**