



July 28, 2023

Eric Shierman
Senior Utility Analyst
Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301

Re: UM 2033 - Reply Comments on Portland General Electric Transportation Electrification Plan

Mr. Shierman,

We, the undersigned organizations, represent businesses that design, manufacture, install, operate, and maintain electric vehicle (EV) charging station software, hardware, and services. We respectfully submit these reply comments in support of Oregon Public Utility Commission Staff's (Staff) recommendation that Portland General Electric (PGE) provide the marginal cost of its existing charging stations that bill customers on Schedule 50 pricing, and the percentage of marginal costs recovered under Schedule 50.¹ We also agree with Staff's recommendation directing PGE to conduct an analysis of its Schedule 50 pricing and provide an updated proposal for Commission review.²

Staff notes in its comments that PGE currently provides Schedule 50 pricing at its utility-owned charging stations "at a significant loss."³ As noted in stakeholders' opening comments, owners of EV charging stations must price charging services in a manner that sustains their economics and reflects the full cost stack associated with operating an EV charging network, which includes not only upfront equipment and installation costs but recurring electricity, operations, and maintenance costs. By undertaking an analysis to align Schedule 50 pricing with market pricing for EV charging services in its service territory, PGE would establish a more level playing field with the competitive market, encourage greater private

¹ Staff Comments at 16.

² *Id.*

³ *Id.*

investment in EV charging infrastructure necessary to support near-term EV adoption, and address upward pressure on utility customer rates from below-market pricing.

We appreciate PGE's interest in revisiting Schedule 50. Accordingly, we encourage the Commission to direct PGE to undertake an analysis to align its tariff with market pricing for EV charging services in its service area and submit a near-term proposal for Commission and stakeholder review.

Respectfully submitted,

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