

July 13, 2023

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Submitted via electronic mail to PUC.FilingCenter@state.or.us

RE: UM 2033 – EVgo Comments on Portland General Electric Transportation Electrification Plan

I. Introduction

EVgo appreciates the opportunity to submit comments before the Public Utility Commission of Oregon (Commission) on Portland General Electric’s (PGE) proposed 2023 Transportation Electrification Plan (TEP).

EVgo is a leader in charging solutions, building and operating the infrastructure and tools needed to expedite the mass adoption of electric vehicles (EVs) for individual drivers, rideshare and commercial fleets, and businesses. Since its founding in 2010, EVgo has led the way to a cleaner transportation future and matches 100% of the electricity consumed on its network with purchases of renewable energy certificates. As one of the nation’s largest public fast charging networks, EVgo’s owned and operated network includes around 900 fast charging locations, 60 metropolitan areas and 30 states. EVgo has several fast charging locations in the greater Portland area with interest in expansion.

EVgo commends PGE’s commitment to accelerate transportation electrification (TE) in a manner consistent with the state’s climate policy objectives. The Commission has an important role to play in executing this vision by developing sound regulations, overseeing the development of just and reasonable rates, and reviewing utility TE programs that catalyze the EV market in Oregon.

While EVgo supports much of PGE’s proposal and recognizes the critical role PGE plays in accelerating TE, EVgo respectfully recommends the following to strengthen PGE’s proposed TEP:

- **Conduct an analysis of market pricing for fast charging services and begin reforming PGE’s Schedule 50 tariff in this proceeding to reflect competitive market pricing in its service area;**
- **Develop a public DCFC incentive program within the TEP that enables PGE to equitably support fast charging deployment in line with state goals and similar to what has been done by peer utilities across the country;**
- **Align EV charger payment, connector, and minimum DCFC charging capacity requirements with the Federal Highway Administration’s (FHWA) National Electric Vehicle Infrastructure (NEVI) program standards; and**
- **Introduce a commercial EV rate in this proceeding for stakeholder and Commission review in line with peer utilities across the country.**

EVgo looks forward to being a resource to the Commission as it continues to develop policies and programs that support Oregon’s TE goals.

II. Conduct an analysis of market pricing for fast charging services and begin reforming PGE’s Schedule 50 tariff in this proceeding to reflect competitive market pricing in its service area

- i. EVgo agrees with PGE’s intent to revisit Schedule 50 to ensure its pricing grows, rather than deters, EV adoption and charging deployments in its service territory*

In its TEP, PGE states an intention to potentially revisit Schedule 50 and expresses interest in transitioning Schedule 50 to per kWh pricing.¹ EVgo is pleased to see PGE make a recommendation to revisit Schedule 50 and asserts that this TEP is the appropriate venue to reform Schedule 50. Further, the rate should be reformed in a way that catalyzes additional private investment needed to support the electric vehicle service equipment (EVSE) deployment goals established in the Transportation Electrification Infrastructure Needs Analysis (TEINA) study.²

Currently, there are several challenges with Schedule 50. First, Schedule 50 encourages sub-optimal charging behavior. By offering customers a flat session fee or flat monthly subscription fee, Schedule 50 blunts any price signal or customer incentive to move their EV once they have received an adequate charge and encourages overconsumption. By contrast, most of the EV charging market charges customers either on a per minute or a per-kWh basis, as a flat fee pricing structure is insufficient for private sector participants to sustain their economics. The NEVI program also requires eligible chargers to communicate prices to drivers on a per-kWh

¹ TEP at 100.

² TEINA study at 21. Available at:

<https://www.oregon.gov/odot/Programs/Documents/23021%20T031%20TEINA%20Report%20August%202022.pdf>

basis, which we expect will lead to more standardization of EVSP pricing with time.³ While PGE has introduced a modest kWh adder to Schedule 50, it only applies 3-8 p.m. on weekdays.

Additionally, PGE asserts in its proposed TEP that its Schedule 50 rate was “designed to approximate home charging rates.”⁴ While this design is well-intentioned, it does not reflect the full cost stack associated with serving commercial electric loads and ultimately allows chargers on PGE’s own network to be priced well below what the competitive market may charge for its services. This is because third-party DCFC providers not only pay commercial – not residential – rates, but also need to price their services to align with other costs to sustain their network, which include but are not limited to equipment, construction, network operations, and maintenance.⁵

The below market pricing applied to PGE’s chargers under Schedule 50, which applies to 26 PGE-owned fast chargers at seven locations across its service area, is also a significant deterrent for incremental private investment in DCFC infrastructure.⁶ Private owner-operators of DCFCs rely on charger utilization to offset capital and operational costs and sustain the economic viability of their charging networks. Further, private DCFC providers must charge a price that reflects the full cost stack for DCFC as detailed above.⁷

Therefore, the competitive market, which relies on station utilization to sustain its economics, cannot effectively compete for usage against a utility provider that charges below market rates and can recover its costs from the body of ratepayers – regardless of whether those customers use PGE’s charging stations. This dynamic not only increases cost burdens on ratepayers, but also diminishes market competition by discouraging further DCFC growth in PGE’s service area. Schedule 50 has been one of the most significant barriers to additional fast charger deployment from the competitive market in PGE’s service area, and a principal reason for limited growth of the EVgo network in PGE’s service territory in recent years. EVgo strongly agrees with PGE that this tariff should be revisited, and we recommend that this process be undertaken within this TEP.

³ <https://www.federalregister.gov/documents/2023/02/28/2023-03500/national-electric-vehicle-infrastructure-standards-and-requirements>

⁴ TEP at 262.

⁵ https://site-assets.evgo.com/f/78437/x/f28386ed92/2020-05-18_evgo-whitepaper_dcfc-cost-and-policy.pdf

⁶ TEP at 100.

⁷ EVgo, The Costs of EV Fast Charging Infrastructure and Economic Benefits to Rapid Scale-Up (explaining that “[w]hile electricity remains the largest cost driver, the full stack of costs also includes equipment at the early stage of a technology adoption curve, construction and installation costs, ongoing networking and maintenance costs, among other factors.”), available at <https://www.evgo.com/white-papers/costs-ev-fast-charging-infrastructureeconomic-benefits-rapid-scale-up/>

- ii. *The Commission should direct PGE to put forth an alternative to Schedule 50 that considers competitive market pricing, as was done for Xcel Colorado's utility-owned network.*

Given PGE's interest in revisiting Schedule 50 and the necessity of Schedule 50 to be amended for a flourishing private sector to develop in its service territory, EVgo recommends that the Commission direct PGE to modify its Schedule 50 tariff in this proceeding to align it with market pricing. This recommendation has precedent in other jurisdictions where utility-owned fast chargers have been approved by public utilities commissions, including Colorado.⁸ In this case, Xcel Energy proposed a pricing schedule for its proposed company-owned fast chargers as low as 14 cents per kWh.⁹ After considering market pricing analyses provided by multiple parties, including the Colorado Energy Office,¹⁰ the Colorado Public Utilities Commission issued a decision adopting an on-peak rate of 55 cents per kWh, and an off-peak rate of 42 cents per kWh.¹¹

The Colorado Public Utilities Commission found that the approved rates were just, reasonable, and in the public interest for the following four reasons:

1. The proposed rates are reasonably expected to stimulate competition and increase customer choice for EV charging, whereas Xcel Energy's proposed initial rate was found to be anticompetitive and deter incremental DCFC deployment¹²;
2. Because the off-peak rate represents the average market price for fast charging services in Colorado, the Commission found that the rate would not lead to underutilization of utility-owned chargers¹³;
3. The on-peak price component of the rate encourages more efficient use of the electric grid and will encourage customers to charge during periods when the electricity system is underutilized¹⁴; and

⁸ RECOMMENDED DECISION OF ADMINISTRATIVE LAW JUDGE CONOR F. FARLEY ACCEPTING THE NONUNANIMOUS PARTIAL STIPULATION ADDRESSING THE RATES AND CHARGES FOR NEW SCHEDULES S-EV AND S-EV-CPP, ACCEPTING THE NONUNANIMOUS PARTIAL STIPULATION ADDRESSING THE RATES AND CHARGES FOR PUBLIC SERVICE-OWNED DC FAST CHARGERS, GRANTING-IN-PART AND DENYING-IN-PART THE JOINT MOTION FOR APPROVAL OF NON-UNANIMOUS COMPREHENSIVE SETTLEMENT AGREEMENT (JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT), AND PROVIDING INSTRUCTIONS, Colorado Public Utilities Commission, Decision R22-0378 at 45, Proceeding 21AL-0494E, filed June 24, 2022.

⁹ Hearing Exhibit 102 (Peuquet Direct Testimony), Rev. 1 at 14:6-9, Proceeding 21AL-0494E.

¹⁰ *Review of Charging Costs at Publicly Available Direct Current Fast Chargers in Colorado*, Prepared by E9 Insight and Optony Inc on behalf of the Colorado Energy Office, Proceeding 21AL-0494E, filed February 2022.

¹¹ Colorado Public Utilities Commission, R22-0378 at 49, Proceeding 21AL-0494E, filed June 24, 2022.

¹² Colorado Public Utilities Commission, R22-0378 at 50, Proceeding 21AL-0494E, filed June 24, 2022.

¹³ *Id.* at 51

¹⁴ *Id.* at 52 The Commission found that a 1.3:1 on-peak to off-peak price ratio was sufficient for encouraging customers to charge during off-peak periods where feasible.

4. By stimulating competition and additional fast charging deployment, the rate improves access to fast charging for low-income customers.¹⁵

To support the development of a new pricing schedule for PGE-owned fast chargers, EVgo recommends that the Commission direct PGE to determine the average market price for fast charging in PGE’s service area on a per kWh basis – excluding any charging stations that offer free charging or do not have any pricing information available. EVgo recommends that PGE put forth the results of its pricing analysis for stakeholder input. Again, this process would be similar to the one undertaken by Xcel Colorado that would culminate in a revised Schedule 50 tariff.

III. Develop a public DCFC incentive program within the TEP that enables PGE to equitably support fast charging deployment in line with state goals and similar to what has been done by peer utilities across the country.

- i. *ODOT’s TEINA study affirms the near-term DCFC infrastructure gap that exists in PGE’s service area*

In its proposed TEP, PGE includes a detailed breakdown of anticipated near-term EVSE needs in its service area based on forecasted EV market growth.¹⁶ Applying the TEINA methodology to its reference case EV forecast, PGE estimates that approximately 2,000 public DCFC ports will be needed in its service area to meet expected demand by 2025. In comparison, only 187 DCFC ports exist today within PGE’s service area, *comprising only 9% of expected need in 2025.*¹⁷ These findings reveal a significant infrastructure gap that threatens to hamper EV adoption in the Portland metro area, which will only continue to widen into 2030 if left unaddressed.

ODOT’s TEINA study identifies several important use cases for DCFC and their role in supporting EV adoption. Specifically, the analysis clarifies that “[a] near term priority focus and support for workplace and urban DCFC charging hubs (addressing both Transportation Network Companies (TNCs) and MUDs), as well as depot charging for public and private fleets, will be needed.”¹⁸ The TEINA study also clearly identifies a lack of DCFC infrastructure as a barrier for EV adoption in disadvantaged communities.¹⁹

Additionally, ODOT states that “DCFC charging ports play a very critical role in bringing about the widespread adoption of EVs as these stations can be more visible to consumers and address lingering concerns over range-anxiety and the availability of public charging.”²⁰ DCFC

¹⁵ *Id.*

¹⁶ TEP at 57-59.

¹⁷ TEP at 59.

¹⁸ TEINA study at 20. Available at:

<https://www.oregon.gov/odot/Programs/Documents/23021%20T031%20TEINA%20Report%20August%202022.pdf>

¹⁹ *Id.* at 37.

²⁰ *Id.* at 20.

infrastructure also supports the charging needs of drivers who do not have dedicated access to EV charging at home, which will only become increasingly important as Oregon's EV market becomes broader and more inclusive of multifamily housing residents and those who lack dedicated parking or garage space. In short, a widespread and accessible network of public fast charging is foundational for supporting the state's TE goals.

- ii. *A new DCFC program should be established that better aligns incentive values with DCFC costs and bridges gaps identified by the TEINA.*

At this time, PGE's proposed TEP does not include any new programs or activities to support the deployment of public DCFC infrastructure. The company notes that it is not planning to expand its utility-owned DCFC network, citing equipment reliability concerns and an intention to replace – but not expand – a number of chargers on its network.²¹ EVgo agrees with PGE that its owned and operated network should not be expanded, but does assert that if the proper framework is put in place, PGE has a strong role to play in catalyzing private market activity to grow public fast charging in its service territory.

Moreover, while PGE's proposed Fleet Partner offering intends to support Make-Ready infrastructure for approximately 100 DCFC ports at fleet charging sites, these chargers will only be accessible to fleet vehicles – not passenger vehicles that rely on public fast charging.²² PGE's other newly proposed light-duty EV programs are exclusively focused on Level 2 (L2) charging needs.²³

PGE identifies its existing Business EV Charging Rebates Pilot Expansion (Schedule 52) in its TEP as an existing offering meant to support public DCFC infrastructure deployment, which includes a \$350 per kW incentive up to \$25,000 per port for DCFC equipment.²⁴ While EVgo conceptually supports scaling incentives based on the capacity (kW) of the charger, the \$25,000 per port cap does not reflect the current costs associated with deploying modern DCFC equipment and does not provide any incremental incentive for any fast charger above 71 kW. In 2019, the International Council on Clean Transportation (ICCT) estimated that the hardware cost for a single-port 150 kW DCFC unit was \$75,000 and \$140,000 for a single-port 350 kW unit.²⁵ Estimated installation costs varied depending on the number and power levels of chargers but ranged from \$28,000-\$39,000 for three to five 150-350 kW chargers. Therefore, according to ICCT, a four-stall DCFC site could cost between \$328,000 and \$599,000. In other words, the

²¹ TEP at 73.

²² *Id.* at 7.

²³ *Id.*

²⁴ *Id.* at 107.

²⁵ MICHAEL NICHOLAS, ESTIMATING ELECTRIC VEHICLE CHARGING INFRASTRUCTURE COSTS ACROSS MAJOR U.S. METROPOLITAN AREAS, (The International Council on Clean Transportation, August 2019) at 2-4, available at <https://theicct.org/publication/estimating-electric-vehicle-charging-infrastructure-costs-across-major-u-s-metropolitan-areas/>

current per port cost cap may not stimulate the investment needed to drive additional DCFC deployment.

To support the deployment of DCFC infrastructure needed to meet expected charging demand in 2025 and beyond, EVgo recommends that PGE restore its Commission-approved \$350 per kW Business EV Charging Rebates offering for DCFC chargers and remove the \$25,000 per port cost cap to align with modern DCFC costs. EVgo also recommends including an additional incentive for DCFC located in disadvantaged communities. These recommendations are supported by previous Commission approval of utility Make-Ready programs, including the Business EV Charging Rebates program, as well as the TEINA study: “[u]tilities need to accelerate make-ready investments for light-duty vehicle (LDV) public charging (including urban hubs, corridors, workplaces, multi-unit dwellings, fleet depots, destinations).”²⁶

Utility programs across the country have recognized the higher costs of DCFC and have set their level of utility investment in make-ready infrastructure accordingly. For example:

- Tucson Electric Power's Make-Ready program, which was recently extended through Decision No. 78777, offers utility investment of up to \$40,000 per DCFC ports for up to 6 ports.²⁷ This means for a 6-port site the utility investment could be up to \$240,000.
- NV Energy's Electric Vehicle Infrastructure Demonstration (EVID) DCFC Program offered \$40,000 per DCFC for up to five charging systems, with a maximum investment of \$200,000 per site.²⁸
- Rocky Mountain Power in Utah offers make-ready as well as investments of \$45,000 per single-port charger and \$63,000 per multi-port charger, covering up to 75% of total charger and installation costs.²⁹
- In Michigan, DTE's newly approved Make-Ready Rebate program will offer up to \$100,000 per site for make-ready, plus up to \$55,000 per DCFC (150 kW and greater).³⁰

²⁶ TEINA study at 44.

²⁷ See TEP EV Smart Charging Program Requirements available at <https://www.tep.com/smart-ev-chargin nrofzram/>

²⁸ \$400/kW up to a cap of the lesser of \$40,000 per Charging Station (\$200,000 for the maximum 5) or 50% of project costs. More info avail:

https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/cleanenergy/handbooks/electric-vehicle-charging-station-incentives-programs-handbook.pdf at 10.

²⁹ See <https://www.rockymountainpower.net/savings-energy-choices/electric-vehicles/utah-incentives.html> and Rocky Mountain Power Schedule 120:

https://www.rockymountainpower.net/content/dam/pcorp/documents/en/rockymountainpower/rates-regulation/utah/rates/120_Plug-in_Electric_Vehicle_Incentive_Pilot_Program.pdf

³⁰ 4 MPSC Order dated November 18, 2022, Case No. U-20836 available at

<https://mipsc.force.com/sfc/servlet.shepherd/version/download/0688y0000058ilbAAI>.

A public DCFC incentive program also aligns with the statutory directives in Senate Bill (SB) 1547, which states:

*The Public Utility Commission shall direct each electric company to file applications, in a form and manner prescribed by the commission, for programs to accelerate transportation electrification. A program proposed by an electric company may include prudent investments in or **customer rebates for electric vehicle charging and related infrastructure**.³¹ (Emphasis added.)*

The inclusion of a public DCFC incentive program also supports compliance with the Commission’s Division 87 rules, which require utility TEPs to demonstrate how their programs will advance EV adoption and enhance EV charging accessibility, including in disadvantaged communities that may have less reliable access to home charging.³²

EVgo recommends that the public DCFC incentive program support at least 10% of PGE’s 2025 expected public DCFC needs – or approximately 200 ports. Assuming the average capacity of each DCFC port is 150 kW, an estimated budget for this program would be \$10.5 million – or approximately 11% of PGE’s proposed TEP budget.³³

A public DCFC program on its own will not be sufficient to accelerate DCFC deployments in PGE’s service territory. A revisit of Schedule 50 as proposed above is also necessary if the market is to take off in line with the needs identified in the TEINA study.

IV. Align EV charger payment, connector, and minimum DCFC charging capacity requirements with FHWA’s NEVI program standards

PGE proposes a number of technical standards for EV chargers deployed in its TEP that are out of step with FHWA standards developed for the NEVI program.³⁴ These standards were developed through an extensive stakeholder process, and EVgo encourages PGE to align its charger payment, connector, and minimum DCFC charging capacity requirements with NEVI.

While PGE proposes to require an EMV chip credit card reader for all public-facing chargers deployed in its TEP, the NEVI standards instead require chargers to “provide for secure payment methods, accessible to persons with disabilities, which at a minimum shall include a *contactless* payment method that accepts major debit and credit cards, and either an automated toll-free

³¹ SB 1547 Section 20(3), available at: <https://olis.oregonlegislature.gov/liz/2016R1/Measures/Overview/SB1547>

³² <https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=4089>

³³ 150 kW * \$350/kW * 200 ports = \$10,500,000

³⁴ <https://www.federalregister.gov/documents/2023/02/28/2023-03500/national-electric-vehicle-infrastructure-standards-and-requirements>

phone number or a short message/messaging system (SMS) that provides the EV charging customer with the option to initiate a charging session and submit payment.”³⁵

Other states are beginning to align their technical requirements with NEVI. For example, the California legislature recently passed a bill modifying the state’s EVSE payment standards – which had previously established credit card chip reader requirements for all publicly available EVSE – to align it with the NEVI program standards by instead requiring contactless or “tap” payment options on public EV chargers.³⁶

PGE also proposes that all DCFC equipment supported by its TEP require both CHAdeMO and CCS connectors.³⁷ The NEVI standards only require CCS connectors, reflecting the majority of EV models available today that are compatible with the CCS standard.

Finally, PGE states that it does not require a minimum power level for customer-owned DCFC in its TEP and that it will also apply an internal minimum standard of 150 kW for its DCFC infrastructure.³⁸ EVgo recommends that PGE align with NEVI minimum charging capacity requirements and its own internal standard by requiring future DCFC equipment funded by its TEP to support at least 150 kW charging.³⁹

V. Introduce a commercial EV rate in this proceeding for stakeholder and Commission review in line with peer utilities across the country

In its proposed TEP, PGE states it is considering the development of a commercial EV rate to support EV charging at non-residential locations.⁴⁰ PGE also states an intent to lower the total cost of ownership of EV charging with this new rate and offer lower rates for charging during off-peak hours.⁴¹ EVgo commends PGE for its intent to pursue a commercial EV rate and recommends that the Commission encourage PGE to file a commercial EV rate in this proceeding to support investment in DCFC infrastructure.

Ensuring that commercial rates support EV charging is a beneficial step that the Commission can take to incentivize private investments in transportation electrification. Indeed, the Commission has already approved a voluntary commercial EV rate that has been effective for Pacific Power

³⁵ “*Contactless payment methods* means a secure method for consumers to purchase services using a debit card, credit card, smartcard, mobile application, or another payment device by using radio frequency identification (RFID) technology and near-field communication (NFC).” <https://www.federalregister.gov/documents/2023/02/28/2023-03500/national-electric-vehicle-infrastructure-standards-and-requirements>

³⁶ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240SB123

³⁷ TEP at 135.

³⁸ TEP at 261.

³⁹ <https://www.federalregister.gov/documents/2023/02/28/2023-03500/national-electric-vehicle-infrastructure-standards-and-requirements>

⁴⁰ TEP at 116.

⁴¹ *Id.*

customers since 2017.⁴² Similarly, other regulators in Washington⁴³, California⁴⁴, Arizona⁴⁵, Utah⁴⁶, and other western states have approved a variety of rates specific to commercial EV charging, as well as technology-neutral low load factor rates. These rate designs mitigate the outsized effect of demand charges on DCFC and help accelerate the deployment of EV charging infrastructure and EV adoption.

EVgo supports PGE's Schedule 38 rate, which does not include demand charges. However, the rate only applies to customers with no more than 200 kW of load.⁴⁷ To serve growing market demand, EVgo and its competitors now develop fast charging sites well in excess of 200 kW.

Given the precedent in Oregon and other states for commercial EV rates, EVgo recommends the Commission similarly support PGE's development of a new, voluntary commercial EV rate open to all commercial customers. EVgo has also developed a list of best practices when considering new commercial EV rate designs.⁴⁸

VI. Conclusion

EVgo appreciates PGE's commitment to TE and supports Oregon's leadership in accelerating EV adoption. Significant near-term infrastructure gaps remain and the Commission has an important role in developing sound policies, programs, and rates to promote TE. To strengthen PGE's TEP and further align it with state policy goals, EVgo recommends that the Commission direct PGE to:

- **Conduct an analysis of market pricing for fast charging services and begin reforming PGE's Schedule 50 tariff in this proceeding to reflect competitive market pricing in its service area;**
- **Develop a public DCFC incentive program within the TEP that enables PGE to equitably support fast charging deployment in line with state goals and similar to what has been done by peer utilities across the country;**
- **Align EV charger payment, connector, and minimum DCFC charging capacity requirements with the Federal Highway Administration's (FHWA) National Electric Vehicle Infrastructure (NEVI) program standards; and**

⁴² https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/rates/045_Public_DC_Fast_Charger_Optional_Transitional_Rate_Delivery_Service.pdf

⁴³ https://www.myavista.com/-/media/myavista/content-documents/our-rates-and-tariffs/wa/wa_013.pdf

⁴⁴ [https://www.sce.com/sites/default/files/inline-files/TOU-EV-7_8_9%20Rate%20Fact%20Sheet_WCAG%20\(2\).pdf](https://www.sce.com/sites/default/files/inline-files/TOU-EV-7_8_9%20Rate%20Fact%20Sheet_WCAG%20(2).pdf)

⁴⁵ https://www.aps.com/-/media/APS/APSCOM-PDFs/Utility/Regulatory-and-Legal/Regulatory-Plan-Details-Tariffs/Business/Rate-Riders/dcfc_DirectCurrentFastCharging.ashx?la=en

⁴⁶ https://www.rockymountainpower.net/content/dam/pcorp/documents/en/rockymountainpower/rates-regulation/utah/rates/006A_General_Service_Energy_Time_of_Day_Option.pdf

⁴⁷ PGE TEP at 116.

⁴⁸ <https://www.evgo.com/blog/7-principles-for-commercial-rate-design-to-enable-transportation-electrification/>

- **Introduce a commercial EV rate in this proceeding for stakeholder and Commission review in line with peer utilities across the country.**

EVgo looks forward to working with PGE and the Commission to accelerate EV adoption in Oregon and to continued engagement in this proceeding.

Respectfully submitted this 13th day of July,

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