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July 13, 2023

Eric Shierman
Oregon Public Utility Commission
121 SW Salmon St
1WTC0306
Portland, Oregon 97204

Re: Docket No. UM 2033, PGE Transportation Electrification Plan

Dear Mr. Shierman:

SWTCH respectfully submits this feedback on the draft 2023 Transportation Electrification (TE) Plan submitted by Portland General Electric (PGE) to the Oregon Public Utility Commission (OPUC, or the Commission) on June 1, 2023.

About SWTCH

SWTCH is a pioneer of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties across North America. Our innovative software platform optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH technology is built using open communication standards to ensure future flexibility and scalability and to eliminate the risk of stranded assets. SWTCH has deployed more than 7,000 charging stations across North America, with a particular focus on ensuring equitable access to EV charging.

Comments

SWTCH commends PGE for its focus on widespread and equitable transportation electrification. The proposed TE Plan is consistent with the directives set forth in HB 2021, which requires electric utilities to develop TE plans to drive the state toward its goal of 80% reduction in greenhouse gas emissions from the power sector by 2030 and to be zero-emission by 2040.

While SWTCH is broadly supportive of PGE's proposal, we believe modifications can support a more effective offering for the multifamily segment. A recent NREL study found that more than one million charging ports will be needed in multifamily properties and workplaces to achieve 50% EV sales of passenger vehicles and light trucks by 2030.¹ The only way for Oregon to achieve its ambitious emissions reduction goals – and to effectively serve all ratepayers – is by ensuring that EV charging solutions are accessible and affordable for every Oregonian. To that end, we offer several program modifications that will better ensure PGE supports the deployment of charging infrastructure at a scale that meets the market need.

¹ The 2030 National Charging Network, NREL. <https://www.nrel.gov/docs/fy23osti/85654.pdf>

Specifically, we propose the following:

1. Maintain multifamily port deployment targets that reflect the needs of the sector.

To encourage EV adoption at the scale required to meet state goals, PGE should at a minimum maintain existing multifamily port targets and put more resources into supporting charging deployment in this critical sector rather than scale back efforts.

PGE's proposed TE Plan includes a dramatic decrease in the number of ports targeted to serve multifamily housing – from 1,000+ ports down to 200 ports. According to the American Community Survey, there are more than 282,000 multifamily residences in the Portland metro area alone. PGE's proposed 200 ports for multifamily units would address less than one-tenth of one percent of this total – only a tiny fraction of the population across the 51 cities and dense urban areas that PGE's territory covers.

PGE's TE Plan notes that only about 3 percent of current EV owners in the territory live in multifamily housing². The Plan reflects a viewpoint that since this market is still developing, less charging is needed. This viewpoint is contradicted by industry experience which reinforces the need for EV charging deployment to drive and enable EV market adoption.³ Indeed, the Plan acknowledges that limited multi-unit dwelling charging is a market barrier.⁴ By scaling back the number of ports supported by PGE programs, the plan will perpetuate rather than address this barrier.

2. Adjust multifamily program design to remove barriers and improve uptake.

Rather than reduce deployment goals in the multifamily sector, SWTCH encourages PGE to consider ways to enhance the attractiveness and uptake of incentives.

Additional program supports and more comprehensive incentives may be required to achieve deployment and adoption goals for the multifamily sector. PGE's proposed incentives include:

- Multi-family and commercial workplace make-ready incentives of \$17,000 per port
- Charger incentive for commercial public and workplace: \$1,000 per port in 2023
- Charger incentive for multifamily: \$2,300 per port in 2023, phasing down to \$2,000 per port in 2024-2025

Given the relatively low multifamily program participation to date, SWTCH believes a higher incentive is warranted for multifamily program participants. This approach would be consistent with other utility program offerings across the country. For example, Pepco Maryland will rebate 100% of the cost of eligible Level 2 charging equipment for multifamily customers. In California, San Diego Gas and Electric offers rebates of up to

² PGE TE Plan p. 231

³ See, e.g. Union of Concerned Scientists. (March, 2021). Federal Support for EV Charging: "Access to EV charging infrastructure must precede or coincide with EV adoption."

⁴ PGE TE Plan p. 231

\$5,000 for a single port and up to \$7,000 for dual port equipment for multifamily residences.^{5, 6}

A focus only on existing multifamily construction is insufficient to increase adoption for this sector; a focus on new construction is also needed. PGE currently offers incentives for EV-ready parking stalls in new affordable multifamily units. This is a valuable first step, and SWTCH encourages PGE to also offer incentives for EV charging hardware and software in new construction. Utilities and other program implementers across the country are increasingly realizing the value of incentivizing charging deployment in new construction. For example, the Texas River Cities Plug-In Electric Vehicle Initiative's Plug in Austin program offers different incentive amounts for new construction and existing construction – an important differentiation to incentivize building developers to include EVSE and make-ready infrastructure in new construction.⁷

3. Increase focus on education and outreach activities for multifamily property owners and managers.

To improve EV and EVSE equity broadly, the Plan should prioritize education and outreach to underserved multifamily communities.

A community's access to EV charging enables a host of associated benefits, from the fueling and maintenance savings that EV drivers enjoy, to improved air quality and respiratory health outcomes associated with reduced pollution from fleet vehicles, delivery vans, and other medium- and heavy-duty vehicles. It follows, therefore, that lack of access to EV charging contributes to growing inequality: those who live in underserved communities have less opportunity to enjoy financial benefits and improved health outcomes enjoyed by those with plentiful charging access. Indeed, such underserved communities are quite literally "disadvantaged."

Education and outreach programs are a central tenet of the Biden Administration's Justice40 initiative, and many utilities have compiled outreach and education plans for their communities.⁸ Forth Mobility, a Portland based equitable transportation electrification non-profit, lays out the following methods for outreach to communities. These can be used as a model to engage with the underserved/multi-family communities in PGE's service territory.⁹

⁵ Multifamily Property Rebate Program

<https://www.pepco.com/SmartEnergy/InnovationTechnology/Pages/MultifamilyPropertyIncentive.aspx>

⁶ Power your Drive for Apartments and Condos

<https://www.sdge.com/business/electric-vehicles/power-your-drive-apartments-and-condos#rebates>

⁷ Texas River Cities Plug-In Electric Vehicle Initiative

https://cleancities.energy.gov/files/u/projects_and_partnerships/project_material/supporting_material/252/texas_river_cities_readiness_plan.pdf

⁸ See, e.g., Xcel EV Toolkit - Outreach & Education

https://xcelenergycommunities.com/sites/xcelenergycommunities.com/files/document/pdf/EVToolkit_OutreachandEducation_0.pdf

⁹ Best Practices for Model Multi-Family Housing Charging, Forth Mobility

<https://forthmobility.org/storage/app/media/Reports/Best%20Practices%20for%20Model%20Multifamily%20Housing%20Charging%20White%20Paper%20May%202023.pdf>

- Community ride and drive events, inviting community members, business and building owners, and charging vendors – “to help community members learn more about affordable electric vehicles and access available EV incentive programs to utilize vehicles that can use this infrastructure.”
- Providing access to EV’s at a community level – through providing EVs for affordable housing managers or local community-based organizations, and/or EVs that can be rented by community members.
- Increasing signage for charging and improving surrounding infrastructure around charging infrastructure.

In Closing

SWTCH commends Portland General Electric’s focus on and support for widespread EV adoption and equitable deployment of EV charging which are critical elements to achieve the state’s emissions reduction goals. SWTCH appreciates the Commission’s and PGE’s consideration of these comments and welcomes further opportunities to participate in the important work of this proceeding.

If you have questions or if I can provide more information, please contact me at josh.cohen@swtchenergy.com or 202.998.7758.

Respectfully,



Josh Cohen
Head of Policy