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December 6, 2019

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,
2019 Transportation Electrification Plan.
Docket No. UM 2033

Dear Filing Center:

Please find enclosed the Comments of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2033

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	COMMENTS OF THE ALLIANCE OF
COMPANY,)	WESTERN ENERGY CONSUMERS
)	
2019 Transportation Electrification Plan.)	
_____)	

Pursuant to Chief Administrative Law Judge Moser’s October 30, 2019 ruling in the above-referenced docket, the Alliance of Western Energy Consumers (“AWEC”) submits the following comments addressing Portland General Electric’s (“PGE” or “Company”) 2019 Transportation Electrification Plan (“TE Plan”).

I. INTRODUCTION

Under the Oregon Administrative Rules, PGE must file its TE Plan for acceptance with the Public Utility Commission of Oregon (“Commission”).^{1/} PGE’s TE Plan must assess the “[c]urrent condition of the transportation electrification market in [PGE’s] Oregon service territory”^{2/} with the necessary supporting data and analysis.^{3/}

II. COMMENTS

Under OAR 860-087-0200(2)(a), “acceptance” of PGE’s TE Plan “means the Commission finds that the TE Plan meets the criteria and requirements of this rule and does not constitute a determination of the prudence of the individual actions discussed” The rule requires PGE’s TE Plan to include the following:

^{1/} OAR 860-087-0020(2).

^{2/} *Id.* at (3)(a).

^{3/} *Id.* at (3)(d).

- (A) A discussion of existing state policies and programs;
- (B) Market barriers that the electric company can address and other barriers that are beyond the electric company's control, including any identified emerging challenges to transportation electrification;
- (C) Existing data on the availability and usage patterns of charging stations;
- (D) Number of electric vehicles of various sizes in the utility service territory and projected number of vehicles in the next five years;
- (E) Other transportation electrification infrastructure, if applicable;
- (F) Charging and vehicle technology updates; and
- (G) Distribution system impacts and opportunities for efficient grid management.^{4/}

Further, PGE's TE Plan must include "[a] summary of [PGE's] transportation electrification program(s) and future transportation electrification concepts and actions in its Oregon service territory...[and] incorporate project learnings and any other relevant information gathered from other transportation electrification infrastructure investments, programs, and actions to ensure that lessons learned are carried forward."^{5/} Additionally, the Company's TE Plan must discuss "how [PGE's] investments, programs, and actions are expected to accelerate transportation electrification, address barriers to adoption, and extend access to traditionally underserved communities."^{6/} Further, the Oregon Administrative Rules require that PGE's TE Plan discuss PGE's "potential impact on the competitive electric vehicle supply equipment

^{4/} Id. at (3)(a)(A)-(G).

^{5/} Id. at (3)(b).

^{6/} Id. at (3)(c).

market,”^{7/} as well as system impacts of the Company’s TE Plan.^{8/} Finally, PGE must discuss the relationship between the Company’s TE Plan and Oregon’s carbon reduction goals and requirements.^{9/}

AWEC’s review of PGE’s TE Plan indicates that it complies with the strict requirements of the above-mentioned rules and, therefore, should be accepted by the Commission. AWEC emphasizes, however, that its recommendation for acceptance is based solely on the requirements of the rules and does not indicate support for any subsequent TE Program PGE proposes from its TE Plan, or the substantive conclusions of PGE’s TE Plan. AWEC will evaluate PGE’s subsequent TE Programs on their own merits when they are proposed.

Dated this 6th day of December, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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^{7/} Id. at (3)(e)

^{8/} Id. at (3)(f).

^{9/} Id. at (3)(g).