WeaveGrid

July 28, 2023

Eric Shierman
Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: Docket No. UM 2033 – Reply Comments of Weave Grid, Inc. on Portland General Electric's Draft 2023 Transportation Electrification Plan

Dear Mr. Shierman,

Weave Grid, Inc. ("WeaveGrid") respectfully submits these reply comments on the Draft 2023 Transportation Electrification Plan ("TEP" or "Plan") filed by Portland General Electric ("PGE" or "the utility") to the Oregon Public Utility Commission ("Commission") on June 1, 2023.

I. Comments

The initial comments submitted in this proceeding generally indicate strong support for Portland General Electric's TEP.[1] Electrification is a key climate mitigation strategy, and we appreciate the utility's robust stakeholder process before and after the Draft TEP filing to ensure that many different perspectives are considered. We continue to recommend that the Commission accept the Plan.

In WeaveGrid's opening comments, we expressed our support for PGE's proposed changes to its Residential Smart Charging Pilot ("Pilot"). In particular, we appreciate the utility's enhanced managed charging functionality efforts within the Smart Grid Testbed's EV Charging Study ("Study"). As stated in our opening comments, we believe the ongoing evaluation being conducted by Opinion Dynamics of the Smart Charging pilot, and the lessons derived from this Study will be important inputs when the Residential Smart

[1] *See* e.g. Docket No. UM 2033, *PGE Transportation Electrification Plan*, ChargePoint Initial Comments (July 13, 2023); Docket No. UM 2033, SWTCH Initial Comments at 1 (July 13, 2023); Docket No. UM 2033, NW Energy Coalition Comments at 1.

Charging Pilot is in a position to grow to a full-scale program.[2] As such, we continue to support granting the utility flexibility to make programmatic changes after PGE's proposed changes are implemented, as this can be an opportunity to enhance customer and grid benefits over time.

Regarding the Pilot, EV.ENERGY CORP ("ev.energy") offered three recommendations to Portland General Electric's efforts in its initial comments:

- PGE should consider expanding the scope of the Residential Smart EV Charging Pilot to include vehicle telematics brands beyond Tesla;
- PGE should consider an enhanced user interface for its Residential Smart EV Charging Pilot in order to increase customer participation in Smart Charge events; and,
- PGE should set aside budget for enhanced managed-charging functionality, including renewable generation alignment and bidirectional charging (V2X).[3]

WeaveGrid is generally supportive of the spirit of ev.energy's recommendations. We agree that utility smart charging efforts should seek to maximize driver participation, provide an excellent customer experience, and continue to explore and develop innovative approaches to provide grid benefits. In our view, PGE's Plan is among the strongest plans of any that we have reviewed in meeting these objectives,[4] and the company has proposed changes for enhancing the already robust and successful existing programs to meet the Commission's and statutory goals.[5]

Despite our general alignment with ev.energy on objectives for the Plan and Residential Smart Charging Pilot, ev.energy's comments often lack support for some of their recommendations, or the citations provided do not sufficiently support their comments. Some statements in their comments are overexaggerated,[6] while others are

[2] Docket No. UM 2033, PGE Draft Transportation Electrification Plan at pp. 172 (June 1, 2023).
[3] Docket No. 2033, Initial Comments of ev.energy on Portland General Electric's Draft 2023 Transportation Electrification Plan at pp. 1, (July 13, 2023).
[4] WeaveGrid has provided comments on utility transportation electrification plans and program proposals in 14 states.
[5] Docket No. UM 2033, PGE Transportation Electrification Plan ("PGE TEP") at pp. 181, Tables 49 and 50..
[6] *See* Con Edison Media Relations, April 5, 2023, "Con Edison Offers a New Start for Drivers Who Charge Smart." https://www.coned.com/en/about-us/media-center/news/2023/04-05/con-edison-offers-a-new-start-for-drivers-who-charge-smart. Ev.energy references its work with Consolidated Edison ("ConEd") in New York in support of its claim that it is "saving Con Edison customers $400/year on average." While WeaveGrid is supportive of ConEd's program design, ev.energy only launched their effort with ConEd earlier this year and does not have a year's worth of data on which to make this assertion.

overly conclusory based on the supporting citations.[7] Notably, they do not cite any third-party evaluations of their in-market pilots and programs while making recommendations.

With respect to expanding coverage, ev.energy recommends increasing customer eligibility with telematics. WeaveGrid is generally supportive of the sentiment, as is PGE,[8] but WeaveGrid is not in favor of doing so in a manner that negatively impacts the customer experience for participants. ev.energy does not explicitly say in its comments that they are one of the platforms that supports "Ford, Chevrolet, Hyundai, Kia, Jeep, Rivian and others,"[9] but its website indicates that the company vehicles from these automakers are "compatible with the ev.energy app."[10] In their comments, however, they did not point to any results from working with these automakers.

This may be because the publicly available information has not been positive. In a 2023 third-party evaluation of an ev.energy-supported utility program in Massachusetts, the third-party evaluator noted that "several vehicle types (including Nissan, Jeep, Hyundai, Ford) had trouble connecting to the software and generating reliable data." [11] As part of the evaluation, ev.energy indicated to the third-party evaluator that they had to disqualify vehicles from three automakers, Hyundai, Jeep, and Nissan, due to "data quality issues stemming from API integration issues."[12] Furthermore, ev.energy indicated to the evaluator that "some participants with Ford EVs were being temporarily locked out of their FordPass accounts as a result of over-pinging of the API by a third party."[13] The evaluator's recommendations highlight the need for "extensive testing and verification with a range of vehicle makes and models" before the next version of the program is introduced.[14] Given this information, ev.energy simply stating that there should be more eligible vehicle makes and models for telematics fails to take into consideration the fallibility of its own approach. WeaveGrid agrees that as many customers as possible should be eligible for EV charging

[7] For example, ev.energy relies on unverified data from a press release when referring to event participation statistics in FN 6, and selectively pulls a quote from a four-page report related to a Tesla-only pilot with 40 participants to support a broader statement about its product's overall effectiveness in FN 7.
[8] Docket No. UM 2033, PGE TEP at pp. 174.
[9] Docket No. UM 2033, ev.energy Initial Comments at pp. 3.
[10] ev.energy website, Integrations page, https://www.ev.energy/drivers/integrations, accessed July 27, 2023.
[11] Docket No. 23-44, *Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for review and approval by the Department of Public Utilities of Proposed Electric Vehicle Program Factors*, Exhibit NG-MM-9, *DNV, National Grid Charge Smart Phase B Evaluation* at pp. 6 (May 15, 2023).
[12] *Id.* at pp. 10.
[13] *Id.*
[14] *Id.* at pp 6.

management programs but emphasizes that participation should only be offered in a way that aligns with the TEP's stated attention to the EV driver's user experience.[15]

While WeaveGrid and other providers recognize the benefits of telematics as part of smart charging programs, we acknowledge that the technology is still relatively new as an application for utilities, and there is a tendency to conflate several different types of technological approaches under one umbrella "telematics" term. For clarity, EV control platform vendors have three main approaches to obtaining telematics data from vehicles. The first is by a direct telematics integration with an OEM-facing application. The second path is to obtain on-board diagnostics data through a device inserted into an EV's OBD-II port. The third is to utilize an OEM's customer-facing application, typically through the customer's mobile app, to communicate with an EV and obtain telematics data, including location, charging status, and state of charge, and charging control.[16] Recently, the Joint Utilities in New York similarly recognized the clear delineation among the various methods to access telematics communications, data, and control from vehicles. [17] It is WeaveGrid's experience that the communications, controls, and data available in the third approach described above can be limited. It is important for utilities designing programs and the regulators evaluating them to understand the tradeoffs between these approaches and that the ability to support the different telematics approaches differs for each automaker.

ev.energy additionally recommends that PGE consider an enhanced user interface to increase participation in managed charging events.[18] Such an approach, according to ev.energy, has been "verified" to result in "much higher" participation in events.[19] WeaveGrid disagrees that such results have been verified, as described above. Even in taking the metrics at face value, it is unclear if ev.energy's definition of participation aligns with that of PGE. Moreover, PGE indicates that over 80 percent of the 1,491 drivers enrolled in the current iteration of the Residential Smart EV Charging Pilot participated in

[15] *See* e.g. Docket No. UM 2033, PGE TEP at 176, 208, 234, and 260.
[16] *See* Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure,* Joint Utilities Proposal for a Method to Test the Accuracy of Managed Charging Enabled Technologies (January 10, 2023); *See also* Application 22-05-002 *et.al.,* Exhibit WG-1, Prepared Direct Testimony of Amanda Myers Wisser on Behalf of Weave Grid, Inc., pp. 7, lines 16-23, (April 21, 2023).
[17] *See* Case 18-E-0138, Joint Utilities Proposal for a Method to Test the Accuracy of Managed Charging Enabled Technologies.
[18] Docket No. UM 2033, ev.energy Initial Comments at pp. 1.
[19] *Id*. at pp. 3.

events during the 2022 demand response season.[20] PGE makes reference to these results as evidence that the Pilot should be expanded for an additional year, demonstrating how encouraging these participation numbers have been.[21] However, WeaveGrid recognizes that customer participation and engagement can continue to be improved. Because PGE likewise acknowledges the need to continue to improve these programs in their Plan and engage as many potential participants as possible,[22] we do not believe that the Commission needs to require specific user interface requirements to further encourage customer participation.

WeaveGrid appreciates efforts from all parties to improve utilities' TEPs. In our view, PGE is already including plans to improve its pilots and programs, and PGE and the Commission should not modify the TEP based on ev.energy's specific recommendations on telematics and user interfaces. Instead, WeaveGrid recommends the PUC accept PGE's Draft TEP and supports the utility's proposed expansions and extensions of its Residential Smart Charging Pilot.

II. Conclusion

WeaveGrid appreciates the opportunity to submit these reply comments recommending timely acceptance of PGE's proposed Draft Transportation Electrification Plan. We thank the Commission for consideration of these comments and look forward to continued engagement.

Respectfully submitted,

/s/ Amanda Myers Wisser
Amanda Myers Wisser
Senior Manager, Policy and Regulatory Affairs
Weave Grid, Inc.
Tel: 650-590-9021
E-mail: amanda.myers@weavegrid.com

[20] Docket No. UM 2033, PGE TEP at pp. 103. WeaveGrid and PGE define participation in events as being plugged in but not charging until the event period has ended.
[21] *Id.*
[22] *Id.* at 174.