



July 13, 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 – 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 comments on the Draft 2023 Transportation Electrification Plan (“TEP” or “Plan”) filed by Portland General Electric (“PGE” or “the Company”) to the Oregon Public Utility Commission (“Commission”) on June 1, 2023.

I. Introduction

WeaveGrid is a software company that helps utilities support increased adoption of electric vehicles (“EVs”) through greater understanding of customer charging behaviors, managed charging programs, and distribution-level optimization. WeaveGrid’s technology leverages utility and charging data, including the embedded vehicle telematics—data, controls, and communication systems—and the charging equipment to transform unpredictable and disaggregated EV charging loads into a cohesive network of controllable grid resources. We also support utilities in engaging their EV customers with personalized messages, insights, and notifications via the web, email, and text message. Our approach enables broad participation in utility programs, including vehicle-grid integration programs, while helping reduce the costs to serve EV loads. WeaveGrid is a market leader in providing these solutions, which we are deploying in utility programs across the United States, including in Oregon with Portland General Electric’s Residential EV Smart Charging Pilot and Smart Grid Testbed’s EV Charging Study.

II. Comments

WeaveGrid applauds Portland General Electric for putting forth a broad and advanced Transportation Electrification Plan for calendar years 2023 through 2025. WeaveGrid recommends that the Commission accept PGE's Draft TEP.

WeaveGrid supports PGE focusing a significant amount of the TEP on planning, serving, and managing the growing EV load.¹ PGE has been a leader in determining and executing strategies to increase EV adoption, particularly through its first TEP, and we think that the Company is positioned to continue to be a leader with the state's and utility's supportive program, incentive structures, and policies in place. We appreciate that PGE is taking the next step to determine and execute strategies that relate to managing the growing EV load. This focus will bolster reliability, resilience, and affordability objectives. It will also serve as a model for other utilities, states, and regions with higher EV adoption levels.

WeaveGrid appreciates the proposed extension and expansion of the Residential Smart Charging Pilot ("Pilot"). PGE is proposing to extend the Pilot from the end of 2024 to the end of 2025 and eliminate the enrollment cap, which is currently set at 5,000 eligible residential customers. WeaveGrid supports these two Pilot updates in the Plan. We expect that these changes will result in greater benefits for the grid and utility customers. Moreover, we believe extending and expanding this Pilot program will provide important learnings for well thought-out full-scale program design.

Similarly, we agree with PGE that the learnings captured from the Smart Grid Testbed's EV Charging Study will provide important direction for a future full-scale program design of the Residential Smart Charging Pilot.² The EV Charging Study is largely focused on evaluating and managing the distribution impact from EVs. This aspect of managing EV load has been underemphasized nationally in areas with early high EV adoption, and these areas portend what will be more widespread in a matter of a few short years as EV adoption meets the mass market. Studies have shown that the distribution grid impacts from EVs can be a significant cost driver in the transition to electric transportation if EV load is not managed properly.³ PGE is a leader in its initiative in

¹ PGE Draft 2023 Transportation Electrification Plan at 6.

² PGE Draft 2023 TEP at 170.

³ Electrification Impacts Study Part 1: Bottom-Up Load Forecasting and System-Level Electrification Impacts Cost Estimates at ES-6, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K423/508423247.PDF>.

studying this important aspect of managing EV load and designing and conducting an innovative study. We applaud the Company for its existing and planned work on this topic and appreciate PGE's efforts to test various aspects of managing EV load while being highly coordinated with other program offerings to advance EV demand flexibility efforts across the service territory and sharing learnings more broadly.

Overall, WeaveGrid believes the Draft Plan aligns with Oregon's critical climate and equity policy priorities, including the state's 100% zero-emission vehicle sales by 2035 mandate and a strong emphasis on supporting underserved communities. PGE's Draft Plan is among the most focused on underserved communities of TEPs we have reviewed and we believe this signals the Company's strong commitment to equitable EV adoption, access, and experience.⁴

III. Conclusion

WeaveGrid appreciates the opportunity to submit these comments recommending 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

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⁴ PGE Draft 2023 TEP at 1.