

March 8, 2023

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 1826 – Staff Investigation into Electric Utility Participation in Clean Fuel Programs

Dear Filing Center,

Portland General Electric Company (PGE or the Company) submits this filing pursuant to Public Utility Commission of Oregon (OPUC or Commission) Order No. 18-376 in Docket No. UM 1826 as amended by Order No. 22-314 in Docket No. 2165.

In October 2018, the Commission issued Order No. 18-376 providing broad guidance on how utilities should spend Clean Fuel Program (CFP) funds and establishing a process for utilities to develop and file annual CFP Plans. In August 2022 the Commission issued Order No. 22-314, which amended the program design principles adopted in the prior order to better allow coordination of CFP funds within utility TE portfolio budgets. Order No. 22-314 also modified the utility CFP planning and budgeting process to integrate it with the utility TE planning process under the Commission's Division 87 TE planning rules. The Commission revised and updated the Division 87 rules to require this holistic planning process in September 2022.

In January 2023, however, PGE requested a waiver under the revised Division 87 rules to extend the filing deadline for its next draft Transportation Electrification Plan (TEP) until June 1, 2023.¹ This was intended to give OPUC Staff (Staff) and stakeholders access to the Company's upcoming Integrated Resource Plan and Clean Energy Plan filings as they review the draft TEP to enable a clearer view of PGE's strategy to support decarbonization of the energy system, including transportation. The Commission approved the waiver with Order No. 23-034, entered on Feb. 8, 2023.²

In its waiver request, PGE noted that the June 1 TEP filing deadline will not accommodate timely or consistent distribution of 2023 CFP funds. The Company proposed to resolve this issue by filing interim budgets to allow Staff and stakeholder review of planned 2023 CFP expenditures as well as Commission approval of 2023 expenditures from House Bill (HB) 2165 Monthly Meter Charge (MMC) revenues. These one-time filings will provide program continuity and lay the groundwork for implementation of the full TEP (encompassing program years 2023, 2024 and 2025), subject to Commission review and acceptance later this year.

Today's informational filing fulfills that commitment with regards to PGE's proposed 2023 CFP expenditures and marks the fifth year PGE is participating as a residential CFP credit generator on behalf of our customers. Because CFP credit revenues are not ratepayer funds this filing serves primarily to affirm our CFP program's continued alignment with the principles described in Order No. 18-376, and no Commission action beyond review is necessary. The Company will submit a separate filing to address and seek Commission approval for 2023 MMC expenditures.

¹ PGE TEP deadline waiver request, 1/10/23, online at <https://edocs.puc.state.or.us/efdocs/HAO/um2033hao161540.pdf>

² Commission Order No. 23-034, online at <https://apps.puc.state.or.us/orders/2023ords/23-034.pdf>

The Company does not expect to file similar one-year budgets in future TEP planning cycles, although off-cycle Plan or Budget updates such as these may occasionally be necessary and are provided for in the revised Division 87 rules.

For the 2023 program year, PGE plans a portfolio of CFP-funded programs that continue the successful programmatic structure adopted with stakeholder input in 2021. Given that this filing does not give Staff and stakeholders the full TE Portfolio view anticipated in the upcoming TEP, the Company has elected not to initiate new CFP-funded programs in 2023, but rather to continue activities previously supported by stakeholders, Staff and the Commission in the following categories:

- **Infrastructure & Grants:** Programs that increase access to transportation electrification.
- **Education and Outreach:** Increase awareness of transportation electrification options across the state.
- **Emerging Technology:** Test and demonstrate emerging technologies that have an electric vehicle (EV) nexus and could scale to larger utility programs.

Included in this filing, as Exhibit A, is PGE's 2023 Clean Fuels Program Plan, which provides more detail on the planned programs. The Company shared a draft of the plan with Staff and stakeholders on February 15, 2023 and requested written comments by March 1. Staff provided a list of questions and two other parties offered general responses that did not result in changes to the plan. PGE has added a table to the plan in Appendix A, summarizing the comments received and Staff's questions, and providing the responses PGE previously shared with Staff by email.

Should you have any questions or comments regarding this filing, please contact Steven Corson at (503) 550-0857.

Please direct your communications related to this filing to the following email address: pge.opuc.filings@pgn.com

Sincerely,

/s/ Shay LaBray

Shay LaBray
Senior Director, Regulatory Affairs & Strategy
Portland General Electric

UM 1826

Exhibit A

PGE's 2023 Clean Fuels Program Plan

Portland General Electric

Clean Fuels Program 2023 Plan



February 2023



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Executive Summary

Portland General Electric Company (PGE or company) appreciates this opportunity to submit its 2023 Clean Fuels Plan. This plan reflects input provided by stakeholders in a series of TE Planning workshops in 2022¹, as well as further engagement in early 2023. PGE will continue the programmatic structure adopted in 2021 with stakeholder input for the 2023 Clean Fuels Program Portfolio. In 2023, PGE will fund programs in the following categories:

- **Infrastructure & Grants:** Programs that increase access to transportation electrification.
- **Education and Outreach:** Increase awareness of transportation electrification options across the state.
- **Emerging Technology:** Test and demonstrate emerging technologies that have an electric vehicle (EV) nexus and could scale to larger utility programs.

While funding amounts vary from year to year, stakeholders may expect the approximate budget breakdown and percentages below for the Clean Fuels portfolio submissions:

Table 1. Target Percentage Categories of Clean Fuels Program Funding

Category	% Portfolio per Year
Infrastructure & Grants	70% - 80%
Education & Outreach	5% - 15%
Emerging Technology	5% - 15%
Est. Administrative Costs	5% - 10%

¹ PGE held TE workshops on April 28, June 14, July 12, August 4, and October 6, 2022. Recordings of these workshops as well as PGE’s presentation materials are online at www.portlandgeneral.com/tep.

This portfolio approach was agreed to by stakeholders and PGE as part of the UM 1826 process beginning in 2021 to provide consistency to Oregon Clean Fuels Program (CFP) programing. The estimated 2023 budget will total approximately \$11.76 million. PGE proposes funding programs at the amounts allocated below:

Table 2. Proposed Clean Fuels Program Funding for 2023

Program	Estimated Program Cost	Portfolio %
Grants and Infrastructure	\$9,054,000	77%
Education & Outreach	\$1,176,000	10%
Emerging Technology	\$588,000	5%
Administrative Costs	\$941,000	8%
Total	\$11,758,800	

1. Introduction

1.1 Regulatory Background

PGE's residential Clean Fuels Program supports equitable deployment of transportation electrification in Oregon to benefit residential customers. The program is funded through the sale of residential credits generated through the Oregon Clean Fuels Program (CFP). PGE is a registered credit generator for credits generated by residential EVs registered in the Company's service area. The CFP is administered by the Oregon Department of Environmental Quality (DEQ), which assigns credits to PGE for the number of residential EVs registered in the Company's service area (based on DMV vehicle registrations) on a biannual basis. PGE monetizes these credits throughout the year in the CFP marketplace and uses the revenue to fund yearly programs to benefit residential customers and support their transition to TE, based on actual revenue from credit sales. There is a two-year delay between when credits are generated and when programs are implemented (e.g., the 2023 PGE Clean Fuels program budget is based on 2021 EV counts).

As required by Commission Order 19-385, which amended a stipulation governing PGE's TE-related pilot projects in Docket No. UM 1811, PGE also generates credits through the charging stations we own, operate, and/or maintain. Revenue from those credits offsets the cost of operating and maintaining that infrastructure.² This plan covers PGE activities funded by residential CFP credits.

To date, PGE has planned CFP-funded programs iteratively with stakeholders, in consultation with DEQ and OPUC staff, and guided by principles delineated in Commission Order No. 18-376, Docket No. UM 1826³. Those principles were amended by Order No. 22-314, Docket No. UM 2165⁴ to allow closer coordination of CFP-funded programs with other TE Portfolio initiatives. The annual review process for residential CFP-funded programs is now incorporated into utility TE Plans. In order to provide continuity and because PGE's next TE Plan will not be filed until later this year, the 2023 CFP Plan does not make any changes to the CFP programs previously agreed to with CFP stakeholders.

² Commission Order No. 19-385, Docket No. UM 1811
<https://apps.puc.state.or.us/orders/2019ords/19-385.pdf>

³ Commission Order No. 18-376, Docket No. UM 1826
<https://apps.puc.state.or.us/edockets/orders.asp?OrderNumber=18-376>.

⁴ Commission Order No. 22-314, Docket No. UM 2165
<https://apps.puc.state.or.us/edockets/orders.asp?OrderNumber=22-314>.

The six program design principles the Commission established under Order No. 18-376 for CFP-funded programs were:

1. Support the goal of electrifying Oregon's transportation sectors
2. Provide the majority of benefits to residential customers
3. Provide benefits to traditionally underserved communities
4. Programs are designed to be independent from ratepayer support
5. Programs are developed collaboratively and transparently
6. Maximize use of funds for implementation of programs

Order No. 22-314⁵ eliminated the fourth principle regarding ratepayer support but retained the remaining principles to guide PGE's CFP-funded programming going forward, with continued stakeholder consultation, as part of the company's broader TE portfolio.

1.2 Portfolio Overview

Starting with the 2021 CFP program portfolio, PGE worked with stakeholders to design a portfolio approach to the spending of proceeds from the sale of residential Clean Fuels credits, including what types of programs to support through this approach. Based on that input, market research, and CFP participation, PGE developed a portfolio method to plan for the CFP. The resulting programs are organized in the following categories:

- **Infrastructure and grants** to accelerate deployment of vehicles and charging across Oregon.
- **Education and outreach** to increase awareness of and dispel existing misconceptions regarding TE and also help create an ecosystem of support roles (e.g., EV/Charger maintenance job training and EV service re-training) that promote a dependable customer experience.
- **Emerging technology** to test new concepts that have both an EV nexus and the ability to scale to larger utility programs.

Administrative costs are tracked and budgeted to remain below 10% of total annual expenditures. While funding amounts vary from year-to-year based on residential CFP Revenue, PGE estimates the following approximate budget breakdown and percentages for programs funded by residential CFP credit revenue:

⁵ Ibid.

Table 3. Target Percentage Categories of Clean Fuels Program Funding

Category	Target % of Portfolio
Infrastructure and Grants	70%-80%
Education and Outreach	5%-15%
Emerging Technology	5%-15%
Estimated Administrative Costs	5%-10%

2. Plan Budget for 2023

PGE will continue to report actual credit revenue to both the PUC and DEQ on an annual basis.⁶

Table 4. Clean Fuels Funds 2023⁷

Category	2023
Grants and Infrastructure (77% of Portfolio)	\$9,054,000
Drive Change Fund	\$4,527,000
Electric School Bus	\$3,622,000
Matching funds	\$543,000
Marketing	\$91,000
Program Management	\$272,000
Education and Outreach (10% of Portfolio)	\$1,176,000
Statewide campaign	\$447,000
Ride-and-Drives	\$176,000
Long term US engagement	\$212,000
PGE Education and Awareness	\$235,000
Program Management	\$106,000
Emerging Technology (5% of Portfolio)	\$588,000
Micromobility	\$265,000
Vehicle-to-Grid	\$147,000
Research and Development	\$118,000
Program Management	\$59,000
Administration Total (8% of Portfolio)	\$941,000
Staff time	\$341,000
REC Purchases for Incremental Credits	\$455,000 ⁸
Evaluation	\$114,000
Total CFP funds	\$11,758,000

3. Programs

3.1 Infrastructure and Grants

These funds support programs that increase access to electric transportation. Funding supports programs that address issues of equity (e.g., the Drive Change Fund and Electric School Bus Fund, which both prioritize traditionally underserved communities). Starting in 2022, PGE set aside matching funds for grants from other sources that support CFP goals. This effort will utilize PGE Clean Fuels funding in an effort to bring external grant opportunities to Oregon. In all cases, funding will target traditionally underserved communities and efforts that increase access to infrastructure in those communities. Details on these efforts follows:

Drive Change Fund (DCF) is a competitive grant fund available to non-residential customers for TE projects that prioritize underserved communities, advance transportation electrification, and benefit residential customers. Since 2019, the DCF has awarded \$8.92 MM in grant funding to 52 organizations. PGE ran the fourth DCF cycle in 2022, awarding \$2.25 MM to 15 community TE projects. The full list of 2022 awardees is available in Appendix A.

PGE is excited to offer DCF for a fifth year in 2023, with \$4,527,000 of available program funds. This year's increased program funding can be attributed to the ability to claim and leverage incremental credits. Beginning in DCF's inaugural year and every programmatic year since, the DCF has received more applicants and requests for funding than revenue available. In 2022 DCF received 34 applicants requesting \$8.6 million in project costs. The additional funding in 2023 will expand the reach of DCF while maintaining the high standard of project quality by continuing to apply the DCF evaluation criteria. If there is not a sufficient pool of quality applicants, 2023 funding would be rolled forward to 2024 and PGE would consult with CFP stakeholders to adjust the 2024 DCF amount accordingly.

In 2023, PGE will continue following the program design elements outlined below:⁹

⁶ Per OAR 340-253-0640(9), PGE must report annual revenues to OPUC and DEQ. Currently this is done via two separate reports; an update to Division 87 rules will consolidate DEQ reporting into that for OPUC.

⁷ Budgets may not sum due to rounding.

⁸ Cost to procure RECs expected to be offset by value of incremental credits.

⁹ These design elements draw on the Program Design Principles and guidance from the Trust-Based Philanthropy Project: <https://trustbasedphilanthropy.org/>

Table 5. Drive Change Fund Program Design Elements

Applicant Eligibility	<ol style="list-style-type: none"> 1. Applicants may be nonprofit, for-profit, or government entities, with a preference for nonprofit and government 2. Applicants need not be PGE customers; however, projects must provide residential community benefit in areas PGE serves
Grant Scope	<ol style="list-style-type: none"> 3. Projects must advance TE and provide a benefit to residential customers, with priority given to projects that address the needs of underserved communities 4. Funds should not cover projects that may be fully implemented through other PGE programs 5. Any charging stations that are funded will be demand response enabled 6. Where appropriate, PGE will claim Clean Fuels credits to continue to fund the DCF
Other Assistance	<ol style="list-style-type: none"> 7. Technical assistance will be offered to help applicants connect with vendors, assess project budgets and scope, navigate technical requirements, and prepare compelling applications 8. Financial assistance will be offered to compensate qualifying applicants for staff time required to prepare an application 9. Where possible, PGE will highlight other complementary funding streams for applicants and synchronize application processes as much as possible
Process	<ol style="list-style-type: none"> 10. A third-party evaluator will evaluate and grade applications, with an internal PGE selection committee making final funding decisions



The DCF continues to seek feedback from stakeholders, applicants, recipients and transportation electrification organizations to expand upon the OPUC’s program design principles, with the goal of creating an equitable application, evaluation process, and funding deployment structure. The following are some examples of the ways PGE took this feedback into consideration in management and continuous improvement of the DCF.

Figure 1. EV of Drive Change Fund Awardee Northwest Family Services

Table 6. Incorporation of Feedback and Program Enhancements in the Drive Change Fund

Staffing <ul style="list-style-type: none">•Hired a grants coordinator to work with awardees to provide greater support and improve project timeline	Timeline <ul style="list-style-type: none">•Reduced the the evaluation period of the grant cycle to improve response timeline•Initial award check cut in the year of award to improve reporting and budget transparency
Tracking <ul style="list-style-type: none">•Selected and started migration to a grants management platform, Cybergrants, to streamline the process for applicants, awardees, and admin•Improved charging/port tracking	Program Improvements <ul style="list-style-type: none">•Successful RFP for a new third-party grant evaluator•Toolkits/social media guides for DCF & ESB awardees•Ensured alignment across applicant materials and award agreement terms

3.1.1 Electric School Bus Fund

Electric School Bus Fund (ESB) is a competitive grant that helps school districts and/or school bus fleet operators acquire electric buses and supporting charging infrastructure. Grant evaluation and selection prioritizes additional outreach to school districts in underserved areas, as well as school districts serving underserved communities. In 2023 PGE will reserve up to \$3,621,716 of CFP dollars to help school districts and/or school bus fleet operators acquire electric buses and demand response-enabled charging infrastructure. Where appropriate, PGE will leverage other funding sources, such as its Fleet Partner Program (Schedule 56), or the EPA's Clean School Bus Program to bring additional value for school districts and make CFP funds go as far as possible.^{10,11}

In 2022, PGE awarded grants to five districts to fund the purchase of six buses. In 2021, PGE awarded grants to six districts to fund the purchase of a total of seven buses. In the first year of ESB in 2020, six electric buses were funded. To date seven electric buses are on the road and

¹⁰ Schedule 56 available here:

https://assets.ctfassets.net/416ywc1laqmd/4dd9mfMxN9CRrBK44zHGks/53401726275ac452bd7eb6e21974a435/Sched_056.pdf.

¹¹ <https://www.epa.gov/cleanschoolbus>

transporting students in Oregon thanks to ESB with an additional 12 ordered. One school district who has participated in ESB aims to acquire 30 electric school buses by 2025, drawing from the learnings from their initial buses funded through CFP funding. Lead-time for buses continues to increase, currently averaging 12-18 months. This is due to several factors including the increased demand from districts across the country as federal funding opportunities increase.



Figure 2. Salem Kaiser School District staff with their electric school bus¹²

Similar to DCF, since ESB's inaugural year and every programmatic year since, the grant fund has received more applicants and requests for funding than revenue available. The additional funding in 2023 will expand the reach of ESB while maintaining the high standard of project quality by continuing to apply the ESB evaluation criteria. If there is not a sufficient pool of quality applicants 2023 funding would be rolled forward to 2024 and PGE would consult with CFP stakeholders to adjust the 2024 ESB amount accordingly. To expand the reach of TE in

¹² Image from a local news story featuring ESB grant recipient, Salem Keizer School District. KGW. (2022, October). Electric school buses hit the road in Oregon as part of plan to fight climate change <https://www.kgw.com/article/tech/science/climate-change/electric-school-buses-oregon-climate-change/283-80b66054-bc85-4df0-9c96-ed20b059c2e7>

traditionally underserved areas PGE is conducting specific outreach and additional support to districts who have not yet received an electric bus through ESB For the 2023 ESB cycle.

3.1.2 Matching External Funds

PGE proposes reserving up to \$543,257 to provide matching funds to public agencies, community-based organizations, nonprofits, educational institutions, and other partnerships applying to external funding opportunities. The need for matching external funds was identified through community feedback and from the increase in federal funding opportunities for electric transportation. This type of quickly deployable funding is a successful approach used by PacifiCorp's CFP program that has enabled additional electric school bus funding.

The first year of grant matching (2022) did not see any successful grant matching bids as the program was only launched three months prior to the DCF award process, where remaining funds roll into the DCF pool. Now that program management policies are in place and ready for first quarter of 2023, PGE expects an increase in matching opportunities in 2023. For 2023, PGE has partnered with the Portland Bureau of Transportation to support a federal grant opportunity. This US Department of Energy Grant aims to expand public charging in the right-of-way. If successful, PGE would provide \$100,000 in matching funding to support comprehensive community outreach in areas underserved by right-of-way chargers as part of the grant.

PGE uses the following criteria to evaluate eligibility for grant matching opportunities, based on the principles for use of CFP funds established by Commission Order 18-376 in UM 1826:

1. Will the proposed project support electrifying Oregon's transportation sector?
2. Will the proposed project benefit residential customers?
3. Will the proposed project benefit traditionally underserved communities?
4. Is the proposed project eligible for external funding?

In deployment of matching funds for 2023 PGE proposes to continue the following program parameters:

- If a proposed project awarded matching funds by PGE does not receive the external funds on which the project depends, the CFP funds will revert to the overall DCF funding pool.
- If any matching funds remain uncommitted when annual DCF awards decisions are made, that uncommitted matching fund amount will revert to the overall DCF funding pool.

3.1.3 Public Charging Infrastructure

The Infrastructure and Grant portfolio has, since 2020, included upgrades of outdated public charging infrastructure. This project focuses on updating legacy charging equipment that had been previously installed and operated by other entities dating back to 2012. The project includes working with site hosts to sign new licensing agreements, easements, upgrade existing infrastructure, and add additional charging ports. In 2022, PGE updated one site

resulting in four new public charging ports. Engaging with site hosts, has proven to be a greater challenge than originally anticipated. Some of the locations have new ownership, a few are no longer in business, and some are no longer interested in hosting fast chargers. No additional funds from the 2023 budget are planned at this time, funding from previous CFP years remains sufficient to update the remaining feasible sites.

3.2 Education and Outreach

Education and outreach funds support programs that help dispel misunderstandings about electric vehicles and educate all Oregonians that electric transportation is here today and works for everyone. This effort will encourage and support an equitable transformation of the transportation sector. Details on these efforts follows:

3.2.1 Statewide Campaign, Oregon' Electric

Based on research conducted in 2019, PGE determined additional awareness was needed around TE to equitably transform Oregon's transportation sector for all Oregonians. Once people are aware of the savings, incentives, and benefits of electric transportation, they are significantly more likely to consider purchasing an EV. Through research and focus groups with customers, PGE learned that there are significant barriers to EV adoption for underserved communities, including misconceptions around product availability, EV infrastructure, and the association of EVs with privilege. In line with CFP program principles, programs must benefit traditionally underserved communities.

In 2021 PGE launched the Oregon' Electric campaign in coordination with Pacific Power, the Oregon Department of Transportation, Oregon Department of Energy, and DEQ. The campaign was specifically targeted at underserved populations in Oregon. The 2021 advertising campaign focused on why people chose electric fuel. The campaign featured real individuals, real vehicles, and real quotes illustrating why Oregonians chose EVs. PGE's team coordinated with an external marketing partner to produce new imagery and campaign content.

In coordination with State partners and stakeholders, PGE completely redesigned the Oregon' Electric campaign website¹³ in 2022 with an emphasis on updated content, a more user-friendly user interface, and updated images. PGE once again partnered with For Good & Co. to produce the new website and content. Reaching underserved communities has been a key aim of the campaign so the entire website is available in both English and Spanish. This new website is more reflective of the broad variety of content available to customers, with the most meaningful content found in sections on Charging, Driving, Costs & Savings, Explore EVs, and News & Events.

¹³ <https://oregoinelectric.com/>

For 2023, PGE will use the updated web page to drive statewide outreach campaigns, with content including but not limited to, EV incentives and rebates included in the Inflation Reduction Act, Oregon’s Clean Vehicle Rebate, Utility EV Rebates, and EV benefits. Funding for this work will continue through 2025 with an RFP for a marketing partner, updates, maintenance, and media buys. To better evaluate the effectiveness of our outreach campaign, we have added analytics which will allow us to track unique visits, click through activity, content engagement, referrals, and common keywords, among others. We will analyze the web data to refine our web experience, and as the residential EV market expands and engagement increases, additional elements will be adapted to reflect evolving needs and further target underserved communities.

3.2.2 Ride-and-Drives and PGE Education and Outreach

In program year 2023, PGE will reserve approximately \$176,400 in CFP funding to host at least two ride-and-drive events for residential customers. The company paused these events during the COVID-19 pandemic but resumed them 2022. An additional \$235,176 is designated for residential PGE customer outreach and education. This includes updating and promoting the total-cost-of-ownership tool, TE content creation.¹⁴ Funds will continue the sponsorship of community focused events like the EV focused area of the Portland Auto Show. Internal research from a 2022 ride and drive survey indicates that these activities increased three-fourths of participants’ likelihood to purchase or lease an EV a little or great deal.¹⁵

3.2.3 Long-Term Engagement with Underserved Communities

PGE’s goal is to integrate underserved communities priorities into the design, build, implementation, and update of TE programs. Beginning in 2023, PGE plans to use CFP funds to implement long-term engagement with underserved communities to better understand the needs of those demographics regarding offerings that support EV adoption and charging. This engagement will include additional forms of electrified transportation such as micromobility and electric-powered public transit.

With the support of a facilitator selected via a RFP, PGE aims to create multiple avenues for stakeholder feedback to address the fact that underserved communities have been underrepresented by traditional avenues such as stakeholder workshops. PGE understands that we must engage more purposefully with underserved communities to earn their feedback. Additionally, we seek to strengthen relationships with community partners, help improve understanding of TE among communities, listen to feedback, and refine TE programing. The

¹⁴ <https://portlandgeneral.com/energy-choices/electric-vehicles-charging/ready-to-buy-an-ev/electric-vehicle-costs-and-savings-calculator>

¹⁵ PGE Transportation Electrification Pilot Program - 2022 Electric Car Guest Drive and EV Charger Exhibit Intercept Survey Results.

long-term engagement strategy of underserved communities, discussed in detail below, will build stronger relationships to better serve customers.

In discussions on how best to engage, stakeholders encouraged PGE to include community group capacity-building¹⁶ in our TE planning. In this context, capacity-building means providing long-term support and compensation for their time and contributions and building understanding of utility regulatory process so they might participate in additional OPUC engagements. We plan to execute this strategy as follows:

- Adopt best practices co-developed with community-based and community-serving organizations leading up to the recent Distribution System Plan filings, Parts 1¹⁷ and 2¹⁸.
- Utilize the PGE Community Engagement Framework¹⁹, the Greenlining Institute's Mobility Equity Framework²⁰, and the City of Portland's Pricing Options for Equitable Mobility (POEM) framework²¹ (a local guide to equitable mobility) to guide our work.
- Commit to an iterative approach that will lean on the guidance and expertise of a local, minority-owned and -led third-party facilitator which we will hire through the RFP process for long-term engagement work. This engagement is focused across PGE's transportation electrification activities and is not specific to Clean Fuels funded programs.

¹⁶ National council of Nonprofits define capacity building as, "an investment in the effectiveness and future sustainability of a nonprofit."

<https://www.councilofnonprofits.org/tools-resources/what-capacity-building>.

¹⁷ PGE. DSP Part 1, available here:

https://assets.ctfassets.net/416ywc1laqmd/i9dxBweWPkS2CtZQ2ISVg/b9472bf8bdab44cc95bbb39938200859/DSP_2021_Report_Full.pdf

¹⁸ PGE. DSP Part 2, available here:

https://downloads.ctfassets.net/416ywc1laqmd/2Fr2nVc4FKONetiVZ8aLWM/b209013acfedf1125ceb7ba2940bac71/DSP_Part_2_-_Full_report.pdf

¹⁹ PGE Community Engagement Framework, used by PGE's DSP team who hosted a multi-year engagement process with stakeholders and community partners

https://assets.ctfassets.net/416ywc1laqmd/1wLNK2VjxZdnWiPSf5wvxf/f34e9939bd4cde85bb36d524b6a0177d/PGE_Community_Engagment_Report_7.20.21.pdf.

²⁰ Greenlining Institute's Mobility Equity Framework elevates values of social equity and community power and addresses structural inequalities through a process for all stakeholders in program and project creation

[MobilityEquityFramework_8.5x11_v_GLI_Print_Endnotes-march-2018.pdf](https://greenlining.org/MobilityEquityFramework_8.5x11_v_GLI_Print_Endnotes-march-2018.pdf) (greenlining.org)

²¹ More of the City of Portland's Pricing Options for Equitable Mobility (POEM) work is available at <https://www.portland.gov/transportation/planning/pricing-options-equitable-mobility-poem>

- Convene a TE community advisory group for workshops 4-8 times per year to delve into each program at various stages. These workshops will focus on gaining specific feedback to make programs more accessible and equitable.
- Compensate organizations and individuals for their participation through CFP funds.

3.3 Emerging Technology

Emerging Technology funds support small-scale testing of new TE technologies with the potential to provide customer and grid benefits. To -date, these funds have been used to test and demonstrate emerging TE technologies that could scale to larger programs. Details on these efforts follows:

3.3.1 Vehicle-to-Grid

PGE plans to continue testing and researching the feasibility of Vehicle-to-Grid (V2G) charging with \$146,985 allocated in 2023. PGE installed and operated two separate V2G projects in 2021-22: a passenger vehicle charger and an electric school bus charger.

The first V2G project was a +/- 6.2 kW Wallbox Quasar Level 2 charger designed to operate with a passenger vehicle (Nissan LEAF) through a CHAdeMO charging connector. PGE energized the charger in October 2021 and successfully demonstrated V2G capabilities by drawing power from the connected EV's battery. Testing is ongoing, with efforts focused on the ability to respond to charge and discharge signals and the round-trip efficiency of the process.

PGE is conducting the second V2G demonstration project in partnership with a school bus transportation contractor (First Student). The project uses a +/- 60 kW Nuvve DCFC unit installed at the First Student bus yard. This unit charges a Bluebird Type-C bus with a 155 kWh battery. The charger was energized in March 2022 and V2G capabilities were demonstrated in June 2022. Similar to the Quasar unit, testing is underway to determine the available time resolution of control, communication latency, and overall charging/discharge efficiency. In 2022 Q2 the school district selected a new transportation contractor who declined to continue testing at the original site. The V2G charger has been relocated to the Wilsonville- West Linn School District and will resume testing in 2023. PGE looks forward to moving beyond the early exploration phase of testing towards the potential for V2G to support community resiliency.

3.3.2 Electric Micromobility

In 2023, PGE plans to allocate approximately \$260,000 in funding to support electric micromobility to the benefit of residential customers. Electric micromobility is a broad category that includes electrified bicycles, scooters, skate and hoverboards, Segways, and small mopeds.

Feedback from underserved communities has indicated that EVs are too costly for many low-income individuals and that EVs are not an option for those who are non-drivers. PGE will explore an electric micromobility program as a potential solution to these barriers. There are

many different incentive types for electric micromobility including rebates, free e-bikes, e-bike lending libraries, bike shares, and charging hubs. While the exact type and role of a utility-supported micromobility offering remains undetermined, funding in 2023 would go toward creation of a micromobility strategy for the next three years, project management, market insights, planning and potential incentives or rebates. As with all CFP programs PGE will share program milestones, progress, and lessons learned with stakeholders through the annual program reports to DEQ and the TE Plan Report PGE will file each year with the OPUC by May 1, beginning in 2024.

3.4 CFP Administration

In 2022, PGE will continue to uphold the program principle of maximizing funds for programs by minimizing administrative expenses. While some funds in the CFP Administration category are used for PGE employee time spent reporting, planning, managing, and selling CFP credits, about half of the funds are earmarked to support the acquisition of renewable energy certificates (RECs) to claim incremental CFP credits. Additionally, a small amount of funds from this category will go towards an evaluation of the Drive Change Fund.

3.4.1 Incremental CFP Credits

DEQ's 2021 CFP rulemaking introduced the concept of base and incremental credits. Base credits are generated through use of a fuel with carbon intensity (CI) lower than that of gasoline or diesel. Incremental credits are generated when a registered entity claims a lower carbon intensity of electricity by retiring alongside EV charging. The distinction exists only in the source of the credits; there is no distinction in selling or trading either type of credit or using them for program compliance

The Environmental Quality Commission adopted these new rules on March 26, 2021, allowing the generation of incremental credits to represent the difference between the current CI of the statewide electric grid and a CI of zero. Incremental credits are generated by demonstrating to DEQ the retirement of RECs paired with electric vehicle charging.

Incremental credits can be generated through DEQ-approved utility voluntary renewable programs and through retiring qualifying RECs. PGE claims these credits because they add additional value to CFP programs that benefit PGE's residential customers. PGE qualified our residential voluntary renewable program, Green Future Choice, to generate incremental credits based on the RECs purchased by residential program participants who own EVs. To ensure that all potentially available incremental residential CFP credits are generated to benefit residential customers, PGE purchased additional qualifying RECs using Clean Fuels program funds for the portion not covered by Green Future Choice participants who own EVs and uses the revenue following the guidance of the CFP program.

Incremental credits were first available in 2021. Since there is a two-year delay between when credits are earned and when they are used to fund a program (e.g., CFP credits from the 2020 EV count funded the 2022 CFP program year) the first year where incremental credits will fund program activity is 2023. Once incremental credits are claimed and deposited into a utility

account by DEQ, they appear as credits in the account balance and there is no way to distinguish them from a base credit. To track the revenue earned via base versus incremental credits, PGE applies the yearly average CFP credit price to the percentage of base versus incremental credits. Incremental credit revenue expenditures will need to meet the same standards as base CFP revenue, with an elevated focus on the underserved communities, for which PGE uses the definition in HB 2165 (2021).

DEQ assigned 46,752 incremental credits to PGE for 2021 (there is a two-year delay between CFP credit generation and programmatic year, 2021 CFP credits are funding 2023 Program year) resulting in approximately \$5,394,400 in incremental revenue. For 2023, PGE plans to use all funds from incremental credits to increase funds available in PGE's two established CFP grant funds with longstanding stakeholder support and strong focus on underserved communities: the Drive Change Fund and the Electric School Bus Fund. As PGE continues to generate incremental credits for future years, PGE will evaluate the use of these funds with stakeholders to maximize the benefits for residential customers, underserved communities, and transportation electrification across the state.

4. Principle Alignment

The PUC’s first three principles are addressed individually in Table 7 below. The remaining principles - (Programs developed collaboratively and transparently; Funds maximized for program use) - are addressed across the entire portfolio and within the stakeholder process.

Table 7. CFP Program Alignment with UM 1826 Program Principles

	Support the goal electrifying Oregon’s transportation sector	Provide majority of benefits to residential customers	Provide benefits to traditionally underserved communities
Drive Change Fund	Provides funds to groups that are unable to access TE vehicles, infrastructure, and training	Organizations receiving funds must serve and demonstrate benefit of project to PGE residential customers	50% of award dollars given to BIPOC and/or women-led organizations; preference for projects serving environmental justice communities Equity Structures in place within application and grant process (Education and outreach, Free technical assistance, financial assistance, Third party evaluation, streamlined reporting requirements)
Electric School Bus Fund	Provides funds to public school districts in PGE service area to deploy electric school buses and charging infrastructure.	Only school districts that serve PGE residential customers are eligible	Preference given to school districts who have higher percentage of students in underserved communities and a demonstrated commitment to DE&I
Matching External Funds	Provides matching funds to entities who apply to and receive other external transportation electrification funding	Evaluation criteria analyzes how the proposed project will benefit residential customers	Evaluation criteria analyzes how the proposed project will benefit traditionally underserved communities
Education & Outreach	Data show many people lack knowledge about TE or have unhelpful misconceptions	Focuses on residential customers	Goal of campaigns and activities to demonstrate the TE works for everyone: it includes public transit, micromobility, power wheelchairs, and EVs; Long-Term engagement with underserved communities will support long-term relationship and capacity building in underserved communities:
Emerging Technology	Better understanding of these technologies has the potential to enhance customer value proposition of EVs by reducing operating costs and improving grid management	Program goal to enhance the value proposition of EVs for residential customers. Data gathered informs distributed energy program creation for residential EV owners	At scale, this program could put downward pressure on rates by decreasing utility operating costs. This is good for all customers, but especially so for underserved and low income communities;
Micromobility	This market segment includes lightweight vehicles such as e-bikes, e-scooters which are electric options particularly to non-drivers	Program will help improve access to electric micromobility for residential customers	Program focuses on those who are unable to afford electric vehicles or who are non-drivers, frequently in underserved communities

5. Conclusion

PGE is excited to continue working with the Clean Fuels Program on behalf of residential customers. We hope our ongoing work within this portfolio structure continues to provide stakeholders with clarity from year to year about PGE's approach to managing this program, and the role it can play in accelerating Oregon's transition to electric vehicles.

PGE's CFP portfolio has grown and matured since 2019. This would not be possible without our customers' participation and ongoing stakeholder feedback and guidance. PGE has closely coordinated with Pacific Power and state agencies including the OPUC, DEQ, Oregon Department of Transportation, and Oregon Department of Energy to ensure that CFP funds have meaningfully supported transportation electrification across Oregon. In 2023, we look forward to continuing successful grant programs, education and outreach activities, and emerging technology research, all while minimizing administrative costs. Additionally, the growing CFP portfolio will allow for expanded involvement of underserved communities, additional micromobility options for residential customers in a consistent and equitable manner across the state. Finally, we remain committed to prioritizing equity and ensuring underserved communities benefit from transportation electrification through program design and implementation.

Appendices

Appendix A Stakeholder Feedback and Questions

PGE shared the 2023 Draft CFP plan via email with stakeholders (TE Plan stakeholder list and UM1826 Distribution list) on February 15, 2023 and reminded stakeholders of the request for feedback in a February 23 email. In response PGE met with Chargeway and received written comments from the Portland Bureau of Transportation (PBOT). PGE also received and responded to five questions from OPUC staff. Both the feedback and questions are listed below. The feedback did not result in modifications to the 2023 CFP Plan

Stakeholder	Feedback
OPUC Staff	See questions below
Chargeway	Chargeway requested a meeting focused on the overall TE Planning and strategy on the company's TE Portfolio. They did have specific feedback on opportunities to leverage Chargeway in the Statewide Oregon' Electric campaign.
PBOT	<ul style="list-style-type: none"> • PBOT wants to reiterate our appreciation for PGE working with us to secure the additional \$100,000 in match funding for our US Department of Energy Park & Charge grant • The City supports investments in EV-carshare or EV charging dedicated to rideshare/carshare through any relevant funding streams, potentially the Drive Change Fund. • The City supports the electric micromobility category and agrees that these modes are a great alternative solution to involve more communities in the transition to transportation electrification. • It does not look like these funds are governed by Division 87, as the Monthly Meter Charge is. However, we encourage PGE to meet the spirit of that requirement and spend 60% of the funds of this budget on activities that support underserved communities.

Questions

Staff Question 1: Please list the charging sites that have become inactive and cannot be assisted by the Public Charging Infrastructure funds, including the time they were in service, charging capacity of their ports, and reason for the end of commercial operation.

PGE Response: See table below; more details will be included in the annual CFP Report filed with DEQ in May. PGE acquired equipment no earlier than 2014 and does not have dates for installation.

Electric Byway Site	Location	Update or Decommissioned	Charging Capacity	Status
Roth's Fresh Markets 2	918 N 1 st St Silverton, OR 97381	Update complete	4 Ports: Two 150 kW DCFC; One dual port 12 kW L2 charger	Charging station came online 10/2022
IBEW 48 Union Hall	15937 NE Airport Way Portland, OR 97230	In progress	1 Port: One 150 kW DCFC	Location under construction
Lincoln Center (Shorenstein)	10200 SW Greenburg Rd. Tigard, OR 97223	In progress	4 Ports: Two 150 kW DCFC; One dual port 12 kW L2 charger	Location under construction
Courtyard Marriott (PacTrust)	15686 SW Sequoia Pkwy Tigard, OR 97224	Assets transferred to customer	3 Ports: One 50 kW DCFC, One dual port 7.2 kW L2 charger	Customer declined upgrade and took ownership of equipment
Burgerville	3504 SE 92 nd Ave Portland, OR 97266	Decommissioned and assets transferred to customer	3 Ports: One single port 50 kW DCFC, Two 7.2 kW L2 charger	Chargers were removed in 2022 due to repeated vandalism at site; assets transferred to customer; less than 0.5 miles from Eastport Electric Avenue
Shari's Café and Pies 1	4998 River Rd Keizer, OR 97303	Decommissioned	3 Ports: One dual port 50 kW DCFC, One 7.2 kW L2 charger	Customer declined upgrade and non-performing chargers were removed

Electric Byway Site	Location	Update or Decommissioned	Charging Capacity	Status
Shari's Café and Pies 2	16280 SW Langer Dr Sherwood, OR 97140	Decommissioned	3 Ports: One dual port 50 kW DCFC, One 7.2 kW L2 charger	Customer declined upgrade and non-performing chargers were removed
Roth's Fresh Markets 1	3045 Commercial St SE Salem, OR 97302	Decommissioned	3 Ports: One dual port 50 kW DCFC, One 7.2 kW L2 charger	Property owner declined upgrade and non-performing chargers were removed
Wilsonville Town Center	8269 SW Wilsonville Rd Wilsonville, OR 97070	Decommissioned	4 Ports: One dual port 50 kW DCFC, Two 7.2 kW L2 charger	PGE did not upgrade due to less than 0.1 mile proximity to Wilsonville Electric Avenue; Non-performing chargers were removed
Clackamas Town Center	12000 SE 82 nd Ave Happy Valley, OR 97086	Decommissioned	5 Ports: One dual port 50 kW DCFC, three single port 7.2 kW L2 chargers	Customer declined upgrade since Volta chargers had been installed

Staff Question 2: Please provide any reason the Newberg transportation contractor gave for discontinuing participation in the V2G demonstration project, and please describe the project's components that cannot be moved to Wilsonville.

PGE Response

The original school district, Newberg, selected a new transportation contractor in March 2022. The original transportation contractor relocated the bus and V2G charger to Wilsonville, in PGE's service area. Movable electrical switchgear (400 A / 480V panelboard, 15kVA single phase transformer, and 120/208V panel) and the V2G charger (including separate rectifier and dispenser cabinets) have been relocated to the new charging site. The civil components that were not needed at the new site (conduit in the ground, concrete pads, and bollards), the 75 kVA PGE service transformer, the meter and meter base, and the 600 A disconnect switch remain at the original Newberg site as pictured below. The remaining Newberg infrastructure could be used to install EV charging at the site should the new contractor electrify their fleet.



Staff Question 3: Please explain what funds were used to purchase RECs to collect more incremental CFP credits.

PGE Response

PGE used CFP administrative funds, as planned in the 2022 CFP Filing (administration section, pg. 17), to purchase the additional RECs needed to claim incremental credits.

Staff Question 4: Please explain why a two-year lag exists between CFP credit generation and expenditure.

PGE Response

Credits generated based upon 2020 EV counts funded CFP program year 2022, and credits generated based upon 2021 EV counts will fund CFP program year 2023. This lag has been present since the first year of utility participation in the CFP and is a function of the process to calculate, generate, monetize, plan for, and then expend CFP funds.

DEQ assigns CFP credits twice a year to utilities based on EVs registered in the service area for the previous six months. DEQ typically assigns these credits to utilities in Q4 for EV counts from January-June of that year, and in Q2 for EV counts from July-December of the previous year. In addition, DEQ assigned 2021 incremental credits in June 2022. PGE monetizes the credits throughout the remaining months for program expenditures under the PGE CFP Plan for the following year. Thus, the credits based on 2021 EV

counts and assigned to PGE by DEQ during late 2021 and 2022 generated funds that will be available for expenditure in 2023.

Staff Question 5: Please provide the analysis that Outgrowing Hunger included in its grant application to show a single EV can be expected to reduce 11,700 pounds of CO₂e per year.

PGE Response

We don't have Outgrowing Hunger's analysis, only the statement that they provided in their 2022 Drive Change Fund application, "Based on the past 5 years of data, this project will result in a CO₂ emissions reduction of approximately 11,700 lbs per year over a project life of 10 years, for a total CO₂ savings of 57 tons." This statement was not a factor in The Drive Change Fund's scoring rubric.

Appendix B PGE 2022 Drive Change Fund Grant Recipients

APANO Communities United Fund is a statewide, grassroots organization uniting Asians and Pacific Islanders to achieve social justice. Their DCF project will install charging infrastructure in partnership with two local Asian-American owned retail businesses along the 82nd Ave corridor. As an emerging civic corridor that cuts through several of the most diverse census tracts in the Portland Metro region, EV charging stations will advance equity and climate goals.

Central City Concern is a nonprofit serving adults and families in the Portland metro area who are impacted by homelessness, poverty, and addiction. Their DCF project will install charging infrastructure at Cedar Commons and Meridian Gardens, two new multi-family affordable housing properties. This will support the organization's efforts to electrify their fleet of vehicles and remove barriers to access for the 15,000 clients served annually, who may themselves acquire electric vehicles.

Chemeketa Community College is a two-year comprehensive public community college located in the Willamette Valley. Their DCF project will include two electric tractors to be used in community college classes, trainings for high school aged students, outreach to community agriculture, and to be lent out to individual farms and vineyards. Agricultural workers in the valley are subjected to the toxic effects of diesel-powered equipment, and affordable access and training with innovative electric technology increases the likelihood that farms and vineyards will adopt electrified agricultural equipment and reduce these exposures.

City of Tigard is one of the fastest growing cities in Oregon with a strategic vision that will transform the city into "an equitable community that is walkable, healthy[,] and accessible for everyone". Their DCF project is an e-bike library pilot that will place e-bikes and storage modules at affordable housing sites in socially vulnerable neighborhoods, providing free access to this emerging technology. This pilot project will illuminate challenges and opportunities to scale e-bike libraries citywide.

Community Cycling Center's mission is to broaden access to cycling and its benefits. Their DCF funding will be used to purchase an electric sprinter van to support their community outreach programs and transport the 40 tons of steel and aluminum bicycle parts they rescue from waste every year. This will assist Community Cycling Center in reducing their carbon footprint and expanding the services they provide to the community.

Ecumenical Ministries of Oregon's mission is to bring together diverse communities of faith to learn, serve and advocate for justice. Their DCF project includes installing charging infrastructure and purchasing electric vehicles to expand their existing service in the Portland Metro region and beyond, with particular focus on HIV services, meal delivery, and refugee programs.

Hacienda CDC is a Latino Community Development Corporation working to strengthen families by providing affordable housing, homeownership support, economic advancement,

and educational opportunities. Their DCF funds will be used to purchase an electric vehicle to support their Youth and Family Services Programs, distribute donations, and provide transportation to staff. This project will expand impactful programs, support climate justice, and increase access to TE technology.

Immigrant and Refugee Community Organization promotes the integration of refugees, immigrants, and community at large into a self-sufficient, healthy and inclusive multi-ethnic society. Their DCF project will include charging infrastructure as well as the purchase of electric ADA vans and an e-transit cargo van. These electric vehicles will transport supplies and community members to services, events, after school programming, and field trips. This project will reduce the organization's carbon footprint and protect public health by minimizing the air pollution released into environmental justice communities.

Linfield University is an independent nonprofit university with a School of Nursing Portland campus. Their DCF funds will be used to install charging infrastructure for use by students, staff, faculty, visitors, and community members. Linfield University is interested in supporting sustainable transportation practices and this project is their first step toward developing strategic for future EV charging infrastructure projects.

Northwest Pilot Project provides services to very low to extremely low-income, disabled, and disenfranchised senior households in Multnomah County. Their DCF project will purchase an electric vehicle for their new Permanent Supporting Housing program, which provides one-on-one personalized support to those with the highest barriers to permanent housing. This project will increase housing stability and quality of life while eliminating tailpipe emissions.

Outgrowing Hunger is a community-based membership organization with an agriculture program and garden space in Gresham and East Portland. Their DCF funds will be used to purchase an electric vehicle to provide support to a network of 13 farms and gardens serving 400 Black, Asian, Latinx, and Slavic farmers and gardeners in east Multnomah and Clackamas counties. Outgrowing Hunger expects this will result in an estimated 11,700 pound reduction of annual CO² emissions.

Raphael House provides lifesaving and life-changing support to adults and children who experience domestic violence. Their DCF project will provide electric vehicles and charging infrastructure to transport families to and from their shelter, accompany survivors to appointments, to look for housing, meet survivors in the community, and distribute donations. Through this project, Raphael House will be better able to serve survivors while reducing their environmental footprint and raising awareness about electric mobility.

Tualatin Hills Park and Recreation's mission is to provide high quality park and recreation facilities, programs, services, and natural areas that meet the needs of the diverse communities it serves. Their DCF funds will support their Mobile Recreation program, which is a dynamic and responsive program offering free activities for youth at parks, Title I schools, community centers, and affordable housing complexes. With the Drive Change Fund, THPRD will have the capacity to serve even more youth.

Volunteers of America Oregon provides outpatient behavioral health treatment and holistic support services to some of Multnomah County's most vulnerable residents—individuals in need of mental health and/or substance use treatment. Their DCF funding will be used to install charging infrastructure and purchase electric vehicles for their peer mentors to connect with treatment program participants in the community, including transporting participants to and from appointments and activities. This program will provide a stable, sustainable, and safe solution for delivery of community-based peer support and transportation of program participants.

Working Theory Farm is a nonprofit educational farm in Hillsboro that empowers youth through the shared work of farming, growing food for partner organizations to distribute to families in need. Their DCF project will include acquisition of an electric tractor for the farm. This electric tractor will reduce the farm's carbon footprint and expand their educational program into demonstrations of the latest environmental technologies addressing pollution and climate change.



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