

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2035

In the Matter of

Idaho Power Company
TRANSPORTATION ELECTRIFICATION
PLAN

STAFF'S COMMENTS

Staff appreciates the work Idaho Power Company (Idaho Power or the Company) put into this inaugural transportation electrification plan (the Plan). In these comments, Staff will identify what additional information is needed for us to recommend the Commission accept this Plan. Broadly, the rules¹ for a transportation electrification plan call for the utility to present all of the electric company's near-term and long-term transportation electrification activities. The Plan should identify a portfolio of actions designed to achieve the Legislature's goals.² The Plan should also address areas most affected by market barriers in the electric company's service territory and provide benefits for traditionally underserved communities.

Specifically, Order No. 19-134 from Docket No. AR 609 established the rules of OAR 680-087-0020, which prescribe the required elements of transportation electrification plans. Staff's comments seek clarification from the Company in the context of these requirements.

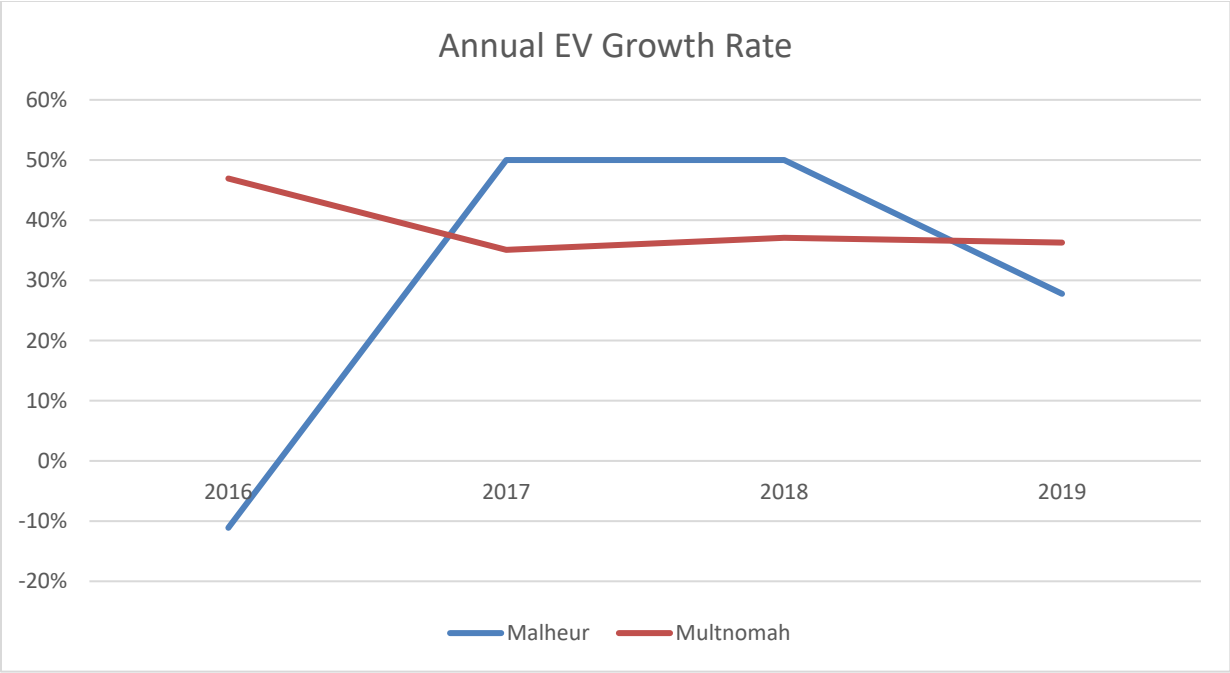
¹ See OAR 860-087-0020(1).

² ORS 757.357.

Current Conditions of the Transportation Electrification [TE] Market in the Company's Oregon Service Area

Staff would like Idaho Power to address Commissioner Tawney's observation that the Company's EV charger demonstration site is not visible to the PlugShare app.³ This may be an opportunity to provide a lesson learned to other owners of charging stations if Idaho Power explains, in its reply comments, how that visibility barrier has or has not been overcome.

On page 3 of the Plan, Idaho Power states: "The Company expects that the adoption of TE will take longer than that of urban areas." Beyond the qualitative descriptions for why Idaho Power has this expectation, Staff finds some insight from comparing growth rates in the most populous county in Idaho Power's territory with the most populous county in PGE's territory.⁴



The growth of EVs in Multnomah County has been steadier for a longer period of time, but in the past three years, Malheur County's growth rate has been comparable to Multnomah's. While in absolute terms, given the much smaller population in Idaho Power's service territory, Staff does not expect a large number of EVs to be in service around Ontario in the near future; if the current trend continues, there could be enough EVs to justify much greater levels of investment by the Company.

³ OPUC Public Meeting, January 14, 2020 (timestamp 44:47), available at https://oregonpuc.granicus.com/MediaPlayer.php?view_id=2&clip_id=445 (comments of Commissioner Letha Tawney).

⁴ Torosyan, Satenik. Oregon Department of Transportation, EV_2015-2019_county.xlsx.

Existing State Policies and Programs

On page 4 of the Plan, Idaho Power states: “In Order No. 18-376, the Commission adopted Staff’s Report dated October 1, 2018, in which Commission Staff determined that Idaho Power does not have sufficient EVs in its Oregon service area to warrant the expense of administering a program using [Clean Fuels Program] revenues.” In the Company’s reply comments, to more fully address this required element of the plan, Staff would like Idaho Power to explain what threshold of EV ownership would warrant the administrative expense of participating in Oregon’s Clean Fuels Program.

Forecast Number of EVs in the Company’s Service Area

On page 10 of the Plan, Idaho Power states: “Based on a stable growth rate, Idaho Power forecasts that 37 EVs will be registered in its Oregon service area by December 2020 and approximately 130 EVs by December 2025.” Staff would like the Company to describe how it arrived at this assumed growth rate and the impact on TE program development and/or participation, and to provide the supporting data and analysis.

Staff notes that Idaho Power’s Oregon service territory also plays an important role as a way station between larger metro areas. In addition to the Company’s customers residing there, Idaho Power should expect growth in EVs passing through its territory.

Future TE Concepts

On pages 18-20 of the Plan, Idaho Power describes several potential programs: a residential charging station incentive, rest area electrification, truck stop electrification, and a charging station for TE program events. Staff would like the Company to describe the expected timeline and costs for these potential programs if they were ultimately pursued, and how they will be prioritized.

Vehicle Technology

Staff appreciates the Company’s summary of pickup truck development.⁵ We agree that the availability of this product line may be a necessary condition for the much deeper electrification of transportation in Idaho Power’s service territory. Staff would also like the Company to comment on the effect cold weather might have on the variance of EV range in Idaho Power’s Oregon service territory.

Lessons Learned

OAR 860-087-0020(3)(b) requires: “The TE Plan must 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.” Staff understands the Company’s programs are educational in nature. We would like to see, in Idaho Power’s reply comments, a detailed description of what

⁵ Idaho Power. Transportation Electrification Plan, page 11.

outreach programs work the best, and which outreach programs the Company has learned to be less effective in any of its TE programs.

Impact on the Competitive Electric Vehicle Supply Equipment Market

On page 22 of the Plan, Idaho Power states: “Given the current state of the eastern Oregon market, it is premature to identify the Company’s potential impact on the competitive EV supply equipment market.” Staff notes the Company did refer to future plans to invest in public charging stations. Staff sees the requirement of OAR 860-087-0020(3)(e) as the place for Idaho Power to communicate the Company’s understanding of where growing a charging station business with ratepayer funds would be appropriate and where it would not be appropriate to use those funds to crowd out a competitive market of independent suppliers of public charging stations. Staff requests an explanation of the Company’s understanding of this issue in its reply comments.

Carbon Reduction

On page 22 of the Plan, the Company states: “The current iteration of the Company’s TE Plan is not likely to have a significant impact on Oregon’s carbon reduction goals.” Staff would like Idaho Power to describe the Company’s impact at the margin to more fully address this required element of the plan. What reduction in carbon emissions does Idaho Power expect per EV?

System Impacts

On page 22 of the Plan, the Company states the requirement of OAR 860-087-0020(3)(f) is “[n]ot applicable” because “[i]t will be many years before the Company’s Oregon service area achieves a level of TE that will materially impact the system.” Staff would like the Company to describe what level of EV penetration in its Oregon service territory would materially impact Idaho Power’s system.

Has any power flow analysis been conducted on the forecasted 130 EVs in 2025? PGE has estimated its network system will require a transformer upgrade for 3 percent of EV owners.⁶ Given that Idaho Power has a more radial-based distribution system, might there be some need for higher levels of distribution system upgrades earlier than PGE has seen?

Conclusion

Staff appreciates the work Idaho Power put into the Company’s first Transportation Electrification Plan. The additional information Staff has requested from Idaho Power will give Staff adequate information to recommend the Commission accept this Plan.

⁶ PGE. Transportation Electrification Plan September 30, 2019, page 78.

This concludes Staff's comments.

Dated at Salem, Oregon, this 14th of February, 2020

A handwritten signature in blue ink, consisting of a large, sweeping loop on the left side that extends into a long, horizontal line across the page.

Eric Shierman
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Energy Resources and Planning Division