BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF OREGON

Docket No. UM 2035

IN THE MATTER OF IDAHO POWER COMPANY'S 2019 TRANSPORTATION ELECTRIFICATION PLAN

COMMENTS OF CHARGEPOINT, INC.

ChargePoint appreciates the opportunity to provide comments on Idaho Power Company's Transportation Electrification ("TE") Plan ("Plan"), filed in compliance with the Oregon Public Utility Commission's ("Commission") Order No. 19-134.

ChargePoint is the world's largest and most open electric vehicle ("EV") charging network with more than 109,000 Level 2 and direct current fast EV charging spots, including over 750 ports in Oregon. ChargePoint designs, develops, and deploys residential and commercial AC Level 2 ("L2") and DC fast charging ("DCFC") electric vehicle charging stations, cloud-based software applications, data analytics, and related customer and driver services aimed at creating a robust, scalable, and grid-friendly EV charging ecosystem.

ChargePoint supports Idaho Power's efforts to foster a market for EVs, educate customers, and enable infrastructure deployment and looks forward to ongoing collaboration on these efforts. We support the Plan as filed and offer the following recommendations to further the goals outlined by the Commission and SB 1547.

I. Idaho Power Can and Should Assist with Market Barriers to EVSE Deployment

Despite the size of Idaho Power's service territory in Oregon, there may still be opportunities to support the adoption of EVs through programs that enable the build-out of networked charging infrastructure, particularly in Ontario and along I-84.

Beginning on page 6 of Idaho Power's Plan, Idaho Power discusses several market barriers to EV adoption. ChargePoint believes an additional barrier should be added to Idaho Power's list: the capital cost of installing EV charging stations.

The capital cost of installing electric vehicle supply equipment ("EVSE") can exceed equipment costs, particularly in retrofits, older properties and rural areas. These capital costs are largely attributable to trenching and make ready, which includes the wiring, panels, and conduit needed to make a parking space ready to install a charging station. Providing incentives for, or investing in, make ready on the customer's side of the meter may help overcome this barrier by lowering the charging station site host's costs of deploying EVSE. We urge Idaho Power to consider offering make-ready infrastructure incentives for public L2 and DC fast charging in its service territory.

We commend Idaho Power's rebate program efforts to date, but encourage future funding programs require L2 networked stations to maximize flexibility and control, and to deliver grid benefits.

II. Low- and Moderate-Income Customers Should be Prioritized in Customer Outreach

ChargePoint appreciates Idaho Power's focus on outreach and education. To the extent that additional EV and EVSE pilots are designed and approved, (1) customer input should be solicited to ensure that program goals meet community needs and (2) approved program details are provided to all customers. However, utilities should not promote specific brands or types of EVs to preserve and support the competitive nature of those industries.

Importantly, Idaho Power is in an excellent position to help educate utility customers, especially low- and moderate-income customers, about the benefits of EVs, and this should be a priority in customer outreach overall.

We greatly appreciate the opportunity to review Idaho Power's Plan in advance of the program filing to provide an opportunity for a collaborative process to work on the Plan with a broad cross-section of stakeholders.

Thank you for your consideration of our comments. Please do not hesitate to contact me at alexandra.leumer@chargepoint.com if you have any questions or if we can provide additional information to help inform the Plan.

Sincerely,

Alexandra Leumer
Director, Public Policy
ChargePoint