

January 22, 2021

Oregon Public Utility Commission
Attn: Public Comment
PO Box 1088
Salem OR 97308-1088

Dear Members of the Oregon Public Utility Commission,

We write today to support Portland General Electric's (PGE) proposal to modify its Schedule 300 to create a Transportation Line Extension Allowance (TLEA). These modifications will streamline and make affordable the development of electric vehicle charging infrastructure, which is a significant barrier to transportation electrification. Electrifying the transportation sector is a stated goal of our community and is also aligned with Governor Kate Brown's Executive Order 20-04 (March 2020), which encourages electric utilities to invest in transportation electrification infrastructure that benefits all customers. Transportation electrification also has myriad financial, health and livability benefits to all our community members and we therefore strongly support this schedule modification.

The City of Milwaukie declared a climate emergency in January 2020, accelerating the community decarbonization goals set forth by our Climate Action Plan, which includes actions promoting transportation electrification and accessible electric vehicle charging infrastructure. By 2045, Milwaukie aims to be a carbon-neutral community. As transportation emissions are the second largest sector of emissions in our community, the pairing of grid decarbonization with transportation electrification has been a key strategy to achieve our community's climate goals. PGE has been a valuable partner in these efforts, and we support opportunities for them to continue their work.

Close collaboration with the electric utility is crucial to realize our transportation electrification and decarbonization goals. "Make ready" infrastructure – that which connects the charging equipment to the electrical grid – is crucial because it is long-lasting, fixed equipment that is complex to connect to the grid, and potentially costly to install depending on the readiness of the electric distribution system backbone. Electric utilities:

- Have insight into the electrical distribution system and are best prepared to advise on the most simple and cost-effective locations to build "make ready" infrastructure;
- Can streamline interconnection;
- Are experienced with complex, capital-intensive endeavors such as this; and
- Can reduce cost barriers to deploying charging infrastructure and can help us spread our capital costs over many years
- Can enable large fleet owners to develop a more systematic approach to the deployment of charging infrastructure regardless of fleet depot locations.

As always, our community wants to ensure that transportation electrification programs benefit all customers. Additionally, we support efforts to bring the benefits of transportation electrification to marginalized communities. The TLEA will accelerate fleet electrification in our community; helping fleets like Milwaukie's transition to cleaner vehicles has a direct health impact for these marginalized communities.



We hope this letter of support has given the Commission insight into how our community strives to affect positive change within our jurisdiction, and how PGE's proposed modifications to its Schedule 300 will help us achieve our goals. We thank PGE for the vision and leadership they have demonstrated in this filing and encourage the Commission to support the modifications as proposed.

Thank you,

A handwritten signature in black ink, appearing to read "Peter Passarelli". The signature is fluid and cursive, with the first name being more prominent.

Peter Passarelli
Public Works Director