

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

RE: Portland General Electric Transportation Line Extension Allowance (TLEA)

Dear Members of the Oregon Public Utility Commission,

The Beaverton Climate Action Plan, adopted in November 2019, established a target of 100% reduction in greenhouse gas emissions by 2050. To achieve that target, our transportation system is and will continue to be a central focus – particularly in escalating the transition to electric vehicles.

I 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. Accelerating development of transportation electrification infrastructure in the region has myriad financial, health and livability benefits to all our citizens and we therefore strongly support this schedule modification.

Beaverton's housing stock is almost evenly split between single-family and multi-family, each of which will need significant attention in developing infrastructure to enable charging for zero emissions vehicles. This is particularly important for residents with lower incomes, and other marginalized populations.

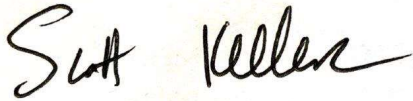
Programs such as the TLEA will be important steps towards meeting emissions goals for Beaverton and Oregon. Governor Kate Brown's Executive Order 20-04 (March 2020) encourages electric utilities to invest in transportation electrification infrastructure that benefits all customers. Close collaboration with the electric utility is crucial to realize this goal. "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.

Beaverton wants to ensure that transportation electrification programs benefit all customers, including marginalized communities. The TLEA will accelerate fleet electrification in Beaverton and other communities; helping fleets transition to cleaner vehicles has a direct health impact for these marginalized communities.

We support this proposal and look forward to continuing partnerships with PGE to meet our climate 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.

Sincerely,

A handwritten signature in black ink that reads "Scott Keller". The signature is written in a cursive style with a large initial "S" and "K".

**Scott Keller**

Senior Program Manager, Sustainability & Recycling  
Community Services & Engagement  
City of Beaverton

Cc: Abigail Elder, Community Services & Engagement Director