

January 21, 2021

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Re: Docket Number: ADV 1149
Docket Name: PGE ADVICE NO 20-17, SCHEDULE 300
TRANSPORTATION ELECTRIFICATION LINE EXTENSION

The purpose of this letter is to express the Tri-County Metropolitan Transportation District of Oregon's (TriMet) support for Portland General Electric's (PGE) proposed modification to their line extension policy (Schedule 300 and associated rules). The rules will enable TriMet, and other fleet operators, to accelerate our transition to electric fuel.

TriMet provides bus, light rail and commuter rail service in the Portland, Oregon region. Prior to the global pandemic, our transportation options provided some 320,000 trips a day, connect people with their community, while easing traffic congestion and reducing air pollution – making our region a better place to live. With one of the largest fleets in the state, we took an ambitious step to commit to remove diesel from our 700+ vehicle fleet by 2040. Accomplishing this goal will greatly expand the reach of electric transportation to hundreds of thousands of our riders.

Our aggressive goals reflect the desires of our customers and the region, and our work to transition our fleet has not slowed down. However, our work cannot be accomplished alone. We need utility partners like PGE to fulfill their responsibility in enabling a rapid transition to electric fuel. PGE's team has worked closely with us and other fleet operators to understand our needs, and their proposed modifications to Schedule 300 clearly reflect that collaboration. Specifically, when PGE is able to invest in the charging infrastructure and overall electric system, TriMet is able to focus on the significant challenges associated with the transition to electrification including investment in new electric buses, modifying depot layouts, adopting new bus and employee schedules, changing maintenance practices, and training our employees for how to operate and service a different technology. While we feel very fortunate to have the support to mount this transition, we are aware that other fleet operators will not be able to do so without the critical support of their electric utility.

In addition to supporting the TLEA, I would urge the Commission to consider enabling utility offerings to include exceptions or alternative participation options for public entities having a greater impact on the equitable transition of public transportation as this is consistent with the goals of the legislature and governor outlined in SB1547 and EO 20-04.

We look forward to continuing our work with PGE, the OPUC, and other utilities in the state to increase access to zero emission transit options to our community. With this in mind, we encourage the Commission to approve PGE's proposed Transportation Line Extension Allowance.

Sincerely,



Doug Kelsey
General Manager