



NATURAL RESOURCES DEFENSE COUNCIL

January 25, 2021

Oregon Public Utility Commission (Commission)

Subject: Advice No. 20-17: Portland General Electric Transportation Electrification Line Extension Allowance

Dear Commissioners,

On behalf of more than 12,000 members of the Natural Resources Defense Council (NRDC) in Oregon, we urge the Commission to act boldly in the face of a growing climate crisis by authorizing Portland General Electric to provide its customers infrastructure needed to tackle the largest source of global warming and diesel pollution in the state.

Nearly five years ago, Oregon's legislature declared: "Widespread transportation electrification requires that electric companies increase access to the use of electricity as a transportation fuel."¹ The same law required investor-owned utilities (IOUs) to propose programs to "accelerate transportation electrification," resulting in the approval of three applications with a combined budget of approximately \$20 million.

Only a few months before the passage of that law in Oregon, California's legislature also declared: "Widespread transportation electrification requires electrical corporations to increase access to the use of electricity as a transportation fuel."² And it likewise directed the state's IOUs to propose investments to "accelerate widespread transportation electrification," resulting in the approval of 18 different applications with a collective budget in excess of \$1.5 billion.

Semantic differences in the two laws and the smaller number of customers in IOU service territory in Oregon cannot sufficiently account for the vastly disproportionate outcomes in the two neighboring states. Adjusting for the number of customers in IOU service territory in the two states, a comparable commitment in Oregon would have been approximately \$187 million.

More recently, California codified a requirement that IOUs propose new tariffs to provide customers installing charging stations outside of single-family homes with necessary "make-ready" infrastructure at no cost for typical sites, and directed its commission to approve the resulting tariffs by June 30, 2021.³ This statutory policy parallels the proposal by Portland General Electric made in this docket to create a "Transportation Electrification Line Extension Allowance."

But this time, Oregon could beat California to the punch. Timely and bold action by the Commission would send a clear signal that Oregon is not content to merely follow and lose pace along the way. Now is not the time for more pilots. The climate crisis requires permanent action.

Thank you for your consideration,

Max Baumhefner
NRDC, California

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NRDC, Pacific Northwest

¹ Oregon Revised Statutes Sec. 757.357.

² California Public Utilities Code Sec. 740.12.

³ California Public Utilities Code Sec. 740.19.