



January 25, 2021

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

Dear Members of the Oregon Public Utility Commission,

The City of Lake Oswego is committed to expanding electric vehicle (EV) infrastructure throughout our community in an equitable manner to serve all of our population. Our Sustainability and Climate Action Plan, adopted by the City Council in May 2020, calls for community carbon neutrality by 2050 including from transportation emissions, which currently contribute 31% of Lake Oswego's total greenhouse gas emissions.

Investing in an electric fleet for our City operations, expanding opportunities for charging at multifamily and mixed-use developments, and providing more community charging stations are three tools specified in our Sustainability and Climate Action Plan to increase the resources available for more residents and businesses to invest in EVs as both personal and fleet options. Our partnership with PGE has been invaluable over the years in providing the education, support, and infrastructure needed to make Lake Oswego an EV friendly community. In 2021, Lake Oswego's Sustainability Advisory Board set a goal to "advocate for electric vehicle adoption in Lake Oswego". Supporting PGE's proposal to create a Transportation Line Extension Allowance fits both the city's climate action goals and those of its Sustainability Advisory Board.

Thus, on behalf of the City, 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. 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.

Electrifying the transportation sector 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. 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.

As always, our community wants to ensure that transportation electrification programs benefit all customers. Therefore, we support efforts to bring the benefits of transportation electrification to marginalized communities. The TLEA will accelerate fleet electrification in our community; helping fleets 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.

Sincerely,



Martha Bennett
City Manager

- c. Lake Oswego City Council
Jenny Slepian, Sustainability and Management Analyst