

March 17, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: AR 654 — Draft Division 87 Rules

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) appreciates the opportunity to provide the Public Utility Commission of Oregon (Commission) its comments on AR 654 Draft Division 87 Rules - Transportation Electrification (TE) Plan.¹

PacifiCorp is committed to promoting TE and believes its role is fundamental in the transition towards TE. The Company supports the development of the updated TE Plan rules and appreciates the detail and thoughtfulness put into the rule revisions. The Company offers the following informal comments.

I. Comments

A. Planning and Reporting Cadence (OAR 860-087-0020(2)(b) and (8))

The draft rules include a two-year planning and reporting cadence for the TE Plan. This cadence could result in only one full year of data collection analysis prior to the Company writing the report. Alternatively, a longer planning and reporting cadence, for example every three years, might be more meaningful as it would: 1) allow for evaluation and monitoring of current TE Portfolios for at least two years of data to be collected, 2) ensure that Final Report findings and lessons learned are incorporated into new TE Plans, 3) ensure that TE Final Report occurs in early part of Year 3, and 4) provide stakeholders ample time to review the TE Final Report over Year 3. The Company looks forward to additional discussion regarding this issue.

B. OAR 860-087-0010 – Definitions

PacifiCorp recommends two changes to this section. The first is to add “Public Infrastructure,” “Transportation Electrification Plan,” and “Transportation Electrification Portfolio” to the definitions for additional clarity. The second change is to consider adding language to the definition of “Communities experiencing lower incomes” so that it also allows the ability to connect to related state programming. As discussed in docket UM 2165, PacifiCorp believes the definition should be flexible to allow for alignment with current electric vehicle (EV) standards in the Oregon Market (such as the Charge Ahead Rebate Program).

¹ Docket No. AR 654, Staff’s Draft Rules for Division 87 Transportation Electrification Plans (Mar. 3, 2022). All references to OAR provisions in these comments are references to Staff’s Draft Rules for Division 87.

C. Material Changes to the TE Plan (OAR 860-087-0020(2)(f))

PacifiCorp is unclear about the meaning of the term “material changes” in OAR 860-087-0020(2)(f) and asks that Staff utilize simpler language such as:

- TE Plan update filings can be limited to *new or significant changes in TE programs* ~~the material changes~~ in the electric company’s TE Plan.

D. Forecast of Charging Infrastructure (OAR 860-087-0020(3)(f))

PacifiCorp appreciates the need to standardize tools for estimating charging infrastructure. However, PacifiCorp suggests moving OAR 860-087-0020(3)(f) under Section (3)(a) as a discussion on current conditions of Transportation Electrification.

E. TE Portfolio Budget (OAR 860-087-0020(5))

PacifiCorp appreciates the details and edits made to discuss the TE portfolio budget. PacifiCorp is seeking clarification regarding specific elements related to (OAR 860-087-0020(5)) as well as suggests potential changes to the rules to support that clarification.

The Company proposes to strike and replace “Expenditures” with “Budget.”

- ~~Expenditures~~ Budget on Transportation Electrification programs or infrastructure measures must be approved by the Commission. The Commission may decide whether to approve the electric company’s TE Budget at the same Public Meeting that the Commission decides whether to accept the company’s TE Plan.

While PacifiCorp will endeavor to estimate all funding sources, the Company suggests the following modification to OAR 860-087-0020(3)(f) as specific account types (grants, base rates and deferrals) will be challenging to forecast in years to come.

- A ~~forecast~~ discussion of all funding sources to be utilized, including but not limited to the Monthly Meter Charge, grants, Clean Fuels Program credits, base rates, deferrals.

Furthermore, additional details regarding the TE Portfolio Budget were shared during AR 654 - Div. 87 Rulemaking: Public Workshop on March 16th, 2022. PacifiCorp is supportive of incorporating the Clean Fuels Program concepts into the overall TE Plan. However, PacifiCorp is contemplating the significance of incorporating Clean Fuels Program approval process as it is currently governed by different rules than the TE Plan.

In addition, details were shared regarding fleet electrification of utility fleets to be included in the overall TE Portfolio Budget. PacifiCorp plans to share the goals, objectives and plans for PacifiCorp’s fleet electrification in accordance with Executive Order 20-24, PacifiCorp would like to suggest that the budget for achieving this not be included in the overall TE Portfolio Budget.

F. TE Plan Report (OAR 806-087-0030(4))

PacifiCorp would like to ask for additional clarity regarding (OAR 806-087-0030(4)), specifically the bullet points below, as the language seems to have potentially been used interchangeably and PacifiCorp wants to understand the difference between spending and line-item expenditures.

- *All spending* in the previous two calendar years in the format of the approved TE Budget;
- *A spreadsheet listing all line-item expenditures* on the TE Plan portfolio in the previous two calendar years with each funding source identified;

In closing, PacifiCorp again appreciates the opportunity to provide these comments and looks forward to continuing its engagement in this proceeding.

Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy".

Shelley McCoy
Director, Regulation