



NW Energy Coalition
for a clean and affordable energy future

25 August 2021

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97308-1088

Re: Docket No. ADV 1288 – NWECA Comments in Response to Staff’s Report Regarding Pacific Power Transportation Electrification Pilot Program Proposals

Thank you for the opportunity to submit these comments in response to the Staff’s report on Pacific Power’s Transportation Electrification (TE) Pilot Program Proposals. We appreciate Pacific Power bringing forward three pilot programs to ensure the utility continues to offer essential customer side programs. We want to see these pilots move forward but feel we need to address a few items.

- First, we agree with ChargePoint that this is the appropriate venue to discuss proposed program criteria. However, we want to express our support for the inclusion of Open Charge Point Protocol or OCPP standards. As we understand OCPP standards, when actively utilized, they help facilitate hardware to software interoperability which protects the utility, customers, consumers, and site hosts from stranded assets. We commend Pacific Power for including this customer protection in their filing.
- Unfortunately, we are disappointed to see that Pacific Power has not included EVSE standards in the nonresidential charging pilot special conditions. EVSE standards can help facilitate access to charging for all customers but were not included even after this issue was raised directly with Pacific Power in advance of the Company filing additional material. We see this as counter to the intent of the nonresidential charging pilot.
- We are seeing a very concerning trend of investments, including ratepayer dollar investments, resulting in charging stations that restrict access to customers through limited payment method options, membership or subscription requirements, requirements that a consumer maintain a minimum balance on an account, discriminatory rates offered by charging providers, and limited to no price transparency.
- Currently, Oregon does not have statewide EVSE standards but ensuring that ratepayer dollar investments in TE are useful and accessible to customers is within the purview of the PUC. In the absence of these standards, we urge the Commission to direct PAC to follow California's EVSE standards for public charging, including workplace and multifamily housing EVSE, as a condition of Commission approval. Additionally, we

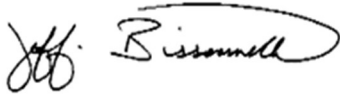
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recommend accessibility criteria be included in the TE Investment Framework being developed in UM 2165.

- Lastly, we appreciate that Pacific Power will be requiring DR capable EVSE and we strongly encourage Pacific Power to actually utilize the DR components by developing a DR program.

Thank you again for the opportunity to comment. We look forward to continuing to participate in further discussions.

Sincerely,

A handwritten signature in black ink that reads "Jeff Bissonnette". The signature is written in a cursive style with a large, sweeping flourish at the end.

Jeff Bissonnette
NW Energy Coalition