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October 24, 2022

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

**Re: Docket No. ADV 1433 – Portland General Electric’s Advice Letter 22-22 to make updates to Schedule 8 and 52**

Attached for electronic filing in the above-referenced matter, please find comments on behalf of ChargePoint, Inc. in response to Portland General Electric’s proposed expansions of its Residential and Nonresidential Electric Vehicle Charging Rebate Pilots.

Please let me know if you have any questions.

Respectfully,

/s/ Matthew Deal

Matthew Deal

Manager, Utility Policy

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cc: Eric Shierman (Senior Utility Analyst) and Sarah Hall (Program Manager), Program Development & Resources, Energy Resources & Planning

**Docket No. ADV 1433**

*Comments by ChargePoint, Inc.*

**I. Introduction**

Pursuant to HB 2165, which requires electric companies to collect a monthly meter charge to support transportation electrification, Portland General Electric (PGE) submitted proposal for a Business EV Charging Rebate Pilot Expansion and a Residential Panel Upgrade Rebate Pilot. The programs will be supported by PGE’s monthly meter charge and implemented by changes to Schedule 8 and 52 described in Advice No. 22-22.

The proposed program expansions will support transportation electrification by offering additional incentives for residential panel upgrades where needed, DCFC equipment for commercial customers, and customer-side make-ready for commercial Level 2 sites. The expansions will also improve program participation by addressing gaps in the current incentive structure to address the barriers impeding charger deployment. ChargePoint, Inc. (ChargePoint) supports PGE’s proposed pilot program expansions and encourages the Public Utility Commission of Oregon (Commission) to approve them as proposed.

**II. About ChargePoint**

Since 2007, ChargePoint has been creating the new fueling network to move all people and goods on electricity. ChargePoint is committed to making it easy for businesses and drivers to go electric, with a world leading electric vehicle (EV) charging network and most complete set of charging solutions available today. ChargePoint’s cloud subscription platform and software-defined charging hardware is designed internally and includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and fleets of all kinds.

**III. Comments**

**A. Residential Panel Upgrade Rebate Pilot (Residential Pilot Expansion) – Schedule 8**

The proposed Residential Pilot Expansion would offer a rebate of up to \$1,000 to upgrade electric panels for customers without 200-amp service enrolling in PGE’s existing Residential EV Charging Pilot to install a qualified Level 2 charger.

PGE states that approximately 17% of customers seeking to install a L2 EV charger require an electrical panel upgrade to increase panel capacity to 200 amps to safely support the added load of a Level 2 home charger. Because upgrading a residential panel may cost as much as \$5,000, or five times the cost of the average residential Level 2 installation, it presents a barrier to installing a charging station at home not addressed by existing incentives.<sup>1</sup> It is appropriate for PGE to offer stackable incentives to increase participation in the Residential Pilot and support EV adoption in homes with the largest cost barriers.

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<sup>1</sup> Oregon Public Utilities Commission, Docket UM 2033, Residential Panel Upgrade Rebate Pilot Infrastructure Measure Application at 3 filed by Portland General Electric (September 2022).

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ChargePoint also supports PGE's request to tether the panel upgrade incentives to enrollment in PGE's existing Residential Pilot and Smart Charging Program. By aligning incentives for equipment, panel upgrades, and managed charging for residential customers, PGE will be able to minimize the financial barriers of at-home charging, as well as adequately measure and anticipate the impact of new EV drivers and loads across its service territory.

**B. Non-Residential Electric Vehicle Charging Rebate Pilot (Business Pilot Expansion) – Schedule 52**

PGE's Business Pilot Expansion proposes additional rebates for commercial customers in two areas that present high costs for potential site hosts: customer-side make-ready for Level 2 chargers and Direct Current Fast Charge (DCFC) equipment. On the Level 2 side, PGE's proposed incentives will cover 80% of customer-side make ready up to \$6,000 per-port and \$36,000 per-site. DCFC charging equipment will be eligible for incentives of \$350 per kW up to \$25,000 per port. ChargePoint supports both expansions as described in Schedule 52.

The current pilot program provides a rebate for utility-side make ready costs. However, many customers incur higher costs on customer-side make ready than utility-side, especially fleet customers serving medium-and-heavy duty vehicles. Therefore, utility-side incentives alone may not address the barriers inhibiting charger deployment. With an expansion of eligible make ready costs to conductors, trenching, and panels on the customer-side, more commercial sites will be able participate in the PGE pilots, leading to greater charger deployment. Additionally, ChargePoint supports the proposed per-port and per-site incentive caps to ensure the rebates are spread out across as many sites and customers as possible.

Under the existing pilot program, only site hosts installing Level 2 ports receive rebates to defray equipment costs. Not only is DCFC equipment more expensive, it is not eligible for financial support. In other words, every potential site host is incentivized to install Level 2 charging stations, regardless of whether Level 2 is the most appropriate solution. Site hosts in the commercial segment serve a variety of different charging use cases, including workplaces, retail locations, destination centers, schools, houses of worship, MUDs, and fleet depots; a one-size-fits-all solution that unilaterally incentivizes Level 2 over DCFC fails to account for the diversity of EV sites. Each site host should be empowered to select charging equipment that matches the needs and dwell times of their visitors. The expansion of equipment incentives to DCFC will improve site hosts' ability to select the charging speed that best fits their use case. ChargePoint also supports the caps proposed for DCFC equipment incentives to ensure per-port costs for the program are reasonably contained.

**IV. Conclusion**

PGE's proposals to implement expansions of the Residential and Non-Residential EV Programs will offer substantial improvements to existing pilot programs and effectively utilize the monthly meter surcharge to advance transportation electrification. The Commission should approve the Business EV Charging Rebate Pilot Expansion and Residential Panel Upgrade Rebate Pilot

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proposed by Advice No. 22-22. ChargePoint thanks the Commission for the opportunity to provide these comments, and we look forward to implementation of the new EV programs.

Respectfully submitted,

/s/ Matthew Deal

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Manager, Utility Policy

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