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February 23, 2023

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

**Re: Docket No. ADV 1480 – Comments in Response to PacifiCorp’s Proposed Update to Schedule 60**

Attached for electronic filing in the above-referenced matter, please find comments on behalf of ChargePoint, Inc. regarding PacifiCorp’s Advice No. 23-001 in Docket No. ADV 1480, filed on January 13, 2023.

Please let me know if you have any questions.

Respectfully,

/s/ Matthew Deal

Matthew Deal  
Manager, Utility Policy  
ChargePoint, Inc.

cc: Eric Shierman, Senior Utility Analyst, Program Development & Resources, Energy Resources & Planning

## I. Introduction

Advice No. 23-001 filed by PacifiCorp proposes an update to Schedule 60, which establishes the pricing for EV charging services offered at company-owned-and-operated electric vehicle (EV) charging stations.<sup>1</sup> If approved, the proposal would shift Schedule 60 from a per-minute rate to a per-kilowatt-hour (kWh) rate, with different prices for peak and off-peak charging for Level 2 and DC fast charging (DCFC) stations. The proposed pricing schedule is summarized in the table below.

	Level 2	DCFC
Peak	\$0.15/kWh	\$0.47/kWh
Off-peak	\$0.07/kWh	\$0.30/kWh

In addition, PacifiCorp proposes adding a 10 cent per-minute surcharge for vehicles that remain plugged in to a charger after the completion of a charging session.

## II. Comments

### **The shift to per-kWh billing will enable more equitable rates to EV drivers.**

ChargePoint commends PacifiCorp for adjusting the structure of Schedule 60 to bill users per-kWh rather than per-minute. Because newer EV charging models tend to offer faster charging times, per-minute billing introduces higher cost burdens for drivers of older vehicles with longer charge times, particularly at DCFC. The proposed shift to per-kWh billing within Schedule 60 will enable equitable, non-discriminatory pricing for charging services.

### **Schedule 60 may bill EV drivers at a price less than the unit price of energy that site hosts must pay to offer charging services.**

Owner-operators of EV charging sites compete for and earn EV drivers' business by setting competitive pricing, offering amenities, or otherwise providing value in ways that will attract drivers to their sites. As both a regulated electric utility and a provider of EV charging services in a competitive market, PacifiCorp has a unique advantage in that it may earn a regulated return on its investments in EV charging infrastructure, regardless of the economics of operating each station. In addition, PacifiCorp has an advantage in that it establishes the rates that its competitors (i.e., other EV site hosts) pay for energy, pending Commission approval, which is just one cost of providing EV charging services. With such advantages in mind, it is important to ensure that Schedule 60 does not undercut the private market and stifle third-party investment by offering below-market rates for charging services.

The unit cost of electricity is one of many costs that EV site hosts consider when determining the price that EV drivers will pay in exchange for EV charging. Site hosts, who are also PacifiCorp ratepayers, are generally billed for electricity under a General Service rate, such as Schedule 23,

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<sup>1</sup> Schedule 60 was approved by the Oregon Public Utility Commission ("Commission") in Order No. 18-311 on August 28, 2018.

28, 29 or 30, to offer charging services. For example, a Level 2 site operating on Schedule 23 might pay 11 cents per kWh to PacifiCorp for energy (plus an additional per-kilowatt charge if demand exceeds 15 kW in a given month), whereas the off-peak rate for Level 2 stations under Schedule 60 pricing is 7 cents per kWh.<sup>2</sup> This means that for 80% of hours in the winter and 88% of hours in the summer, EV drivers would pay much less to charge at PacifiCorp-owned charging stations than what PacifiCorp bills commercial customers for energy to dispense to EV drivers at privately-operated stations.

Furthermore, when establishing prices for charging services, site hosts typically consider not only the unit cost of electricity, but also capital and other ongoing operating expenses (such as maintenance) associated with providing EV charging services. Under a pricing schedule where EV drivers pay below-market rates at utility-owned stations for the majority of hours, it is impossible for PacifiCorp to avoid undercutting the competitive market for EV charging services.

**The proposed rates should be based on a review of prices offered by the competitive charging market today.**

ChargePoint is concerned that the methodology used by PacifiCorp to determine the proposed peak and off-peak pricing values for utility-owned Level 2 and DCFC does not properly consider the current conditions of the competitive charging market. The per-minute billing rate established by Schedule 60 and approved by the Commission in 2018 was based on what the market appeared to be charging at the time, in order to avoid under-cutting private market competitors.<sup>3</sup> Rather than conduct a similar analysis based on the cost of charging services in 2023, Advice No. 23-001 indicates that the proposed per-kWh rates for peak and off-peak charging at Level 2 and DCFC stations were designed to “yield the same revenue as the existing per-minute pricing.”<sup>4</sup>

It is not clear to ChargePoint that a review of competitive prices for EV charging from five years ago is an adequate representation of competitive prices today. Advice No. 23-001 provides no comparison for how the proposed update to Schedule 60 compares with the prices offered by competitors. It is important to confirm that Schedule 60 continues to align with the prices offered by the competitive market, particularly in the context of PacifiCorp’s 2023-2025 draft Transportation Electrification Plan, which proposes a significant expansion of utility-owned public charging stations that will be priced according to Schedule 60.<sup>5</sup> PacifiCorp should return

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<sup>2</sup> PacifiCorp – Oregon Price Summary, in Effect as of January 1, 2023, at 4, available at: [https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/Oregon\\_Price\\_Summary.pdf](https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/Oregon_Price_Summary.pdf)

<sup>3</sup> Docket No. UE 347 / Advice No. 18-005, Proposed pricing structure for Schedule 60- Company Operated Electric Vehicle Charging Station Service, Public Utility Commission of Oregon Staff Report filed on September 8, 2018 and available at: [https://edocs.puc.state.or.us/efdocs/HAU/ue347hau16650.pdf](https://edocs.puc.state.or.us/efddocs/HAU/ue347hau16650.pdf)

<sup>4</sup> Docket No. ADV 1480 / Advice No. 23-001, Proposed update to Schedule 60 – Company Operated Electric Vehicle Charging Station Service at 2, filed by PacifiCorp on January 13, 2023.

<sup>5</sup> UM 2056 – PacifiCorp’s Draft 2023 Oregon Transportation Electrification Plan; Public Utility-Owned Infrastructure Pilot Program, Draft Pilot Program Application, filed on February 14, 2023.

to the methodology used in 2018 to calculate reasonable per-minute pricing values. Specifically, there should be a review of all public charging stations that charge a fee in Oregon, and the update to Schedule 60 should be based on the average of rates offered by competitive market.

**The idling fee is an effective tool for charger management.**

PacifiCorp proposes an idling fee of 10 cents per-minute to apply in the 10 minutes after a charging session ends to incentivize vehicle turnover at DCFC stations. ChargePoint supports the concept of an idling fee, as the proposed pricing configuration is a form of charger management that is commonly used by site hosts to encourage EV drivers to vacate a charging spot when their session has ended. ChargePoint takes no position on whether the 10 cent per minute fee is appropriate to send the desired price signal, or whether 10 minutes is an appropriate length of time as a grace period.

**III. Conclusion**

ChargePoint thanks the Commission for the opportunity to provide these comments. We look forward to continuing to work with Commission Staff, PacifiCorp, and other stakeholders to promote development of public charging stations and help achieve Oregon's energy, environmental, transportation, and economic development goals.