



Portland General Electric
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PortlandGeneral.com

February 11, 2019

Via email:
puc.filingcenter@state.or.us

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

RE: AR 609 – Reply Comments of Portland General Electric Company

Portland General Electric Company (PGE) appreciates the opportunity to provide reply comments on the Transportation Electrification (TE) Plan rules as filed with the Secretary of State on December 21, 2018.

PGE is supportive of OPUC Staff's proposed TE Plan rule. PGE is appreciative of the work and diligence of Staff in the collaborative process of creating the proposed rule and of having the opportunity to provide comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Karla Wenzel". The signature is fluid and cursive, written in a professional style.

Karla Wenzel
Manager, Pricing and Tariffs
Portland General Electric Company

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 609

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Transportation Electrification (TE) Plan
Rulemaking

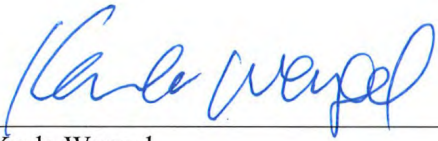
REPLY COMMENTS OF PORTLAND
GENERAL ELECTRIC COMPANY

Portland General Electric (PGE) submits these comments in response to the proposed AR 609 Transportation Electrification (TE) Plan rules as filed with the Secretary of State on December 21, 2018. The rules are intended to provide more detail for the Oregon Administrative Rule 860-087-0020 (TE Plan) as directed by Commission Order No. 16-447 (Docket No. AR 599) and authorized in Section 20 of Senate Bill (SB) 1547. Prior to the rules' publication by the Secretary of State, OPUC Staff held an informal workshop and invited written comments on draft rules.

PGE is supportive of OPUC Staff's proposed TE Plan rule. We recognize the ambitious goals to accelerate TE that are stated in SB 1547 and believe that OAR 860-087-0030, which identifies application requirements for proposed TE programs, provides the framework to achieve these objectives while prescribing the form and manner of TE program applications. PGE's view is that TE plans, which will be submitted in compliance with the OAR 860-087-0020 adopted in this docket, will contain accountability mechanisms that will inform the Commission as to how utilities follow SB 1547 and accelerate TE through implementation of programs. Moreover, TE Plans will incorporate program information and analysis that will provide meaningful information in support of accelerating TE, as mandated by SB 1547.

PGE is appreciative of the work and diligence of Staff in the collaborative process of creating the proposed rule and of having the opportunity to provide comments. We look forward to continuing to work with stakeholders to accelerate transportation electrification in the State of Oregon.

Dated this 11th day of February 2019



Karla Wenzel
Manager, Pricing and Tariffs
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