July 22, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
PO Box 1088
Salem, OR 97308-1088

Re: TE Portfolio Metrics, Dockets No. UM 2165, TE Investment Framework and AR 654, Division 87 rulemaking

Filing Center:

Throughout the workshops and comment periods associated with UM 2165, the investigation into a Transportation Electrification (TE) Investment Framework, and AR 654, the Division 87 rulemaking, Staff for the Public Utility Commission of Oregon (OPUC or Commission) have engaged with utilities and stakeholders in discussions regarding appropriate tracking and performance metrics to be used in evaluating the effectiveness of utility TE Plans. In Staff's public meeting memo requesting the Commission open formal rulemaking to revise the Division 87 rules[1], Staff noted that parties had discussed the idea of developing a guidance document that will work alongside the rules to provide more implementation-level detail, and specifically invited the Joint Parties – Climate Solutions, Green Energy Institute, NW Energy Coalition, Oregon Citizens' Utility Board, Oregon Environmental Council, and Verde – to work with the utilities to develop details, such as performance metrics, they would like included in the guidance document.

With input from utilities and stakeholders, Staff has also included broad categories for performance measurement in the draft revisions to the Division 87 rules[2]. In draft OAR 860-087-0020 (3)(c), these include:

(A) Environmental benefits including greenhouse gas emissions impacts;
(B) Electric vehicle adoption;
(C) Underserved community inclusion and engagement;
(D) Equity of program offerings to meet underserved communities;
(E) Distribution system impacts and grid integration benefits;
(F) Program participation and adoption;
(G) Infrastructure performance including charging adequacy which considers, but is not limited to reliability, affordability and accessibility

Accordingly, representatives of the Joint Parties have continued to meet outside the UM 2165 and AR 654 dockets with representatives of Portland General Electric and PacifiCorp to develop a set of performance and tracking metrics that all the engaged parties can agree would be appropriate for use in evaluating utility TE Plans. Staff representatives have also attended these meetings.

[1] OPUC Order No. 22-158, page 4, available online at https://apps.puc.state.or.us/orders/2022ords/22-158.pdf.
[2] Office of the Secretary of State, Notice of Proposed Rulemaking, 5/27/22, page 7, available online at https://edocs.puc.state.or.us/efdocs/HCB/ar654hcb8520.pdf.

The result of this effort is attached. These proposed metrics reflect dialogue and revisions with the input of the undersigned, conducted over the course of more than a year. They are organized into the draft Division 87 categories described above, with additional clarification of the goal of the metrics and their uses for measuring performance, tracking, and establishing baselines. The Joint Parties, Portland General Electric, and PacifiCorp agree these are appropriate initial metrics for tracking key information and for evaluating utility TE portfolios and ask that Staff incorporate them into their planned guidance document, due for release August 2. We expect the metrics will continue to evolve in future TE planning cycles as utility TE plans, programs, and infrastructure measures mature and parties gain a better understanding of what data is most useful in evaluating them.

We encourage Staff to contact us with any questions or concerns regarding the attached and thank Staff for the opportunity to develop and provide this material.

Respectfully,

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Attachment: Utility TE Portfolio Metrics

Utility TE Portfolio Metrics

Goal of metrics:

- Monitor utility performance through the discussion of performance areas within TE Plans, establishing targets within TE Plans, and tracking metrics within TE Plan Reports.
- Consistently track and report on performance metrics to establish baseline data.
- Utilize data to evaluate utility TE portfolio outcomes and gaps and make informed recommendations.
- Prioritize metrics that assess an equitable distribution of benefits and burdens as well as affordability.

TE Portfolio Metrics

Environmental benefits including greenhouse gas emissions impacts (860-087-0020(3)(c)(A))

1. Metric: GHG emission and air pollution reductions estimated from all EVs registered in a utility service area.

   Type of metric: tracking metric

   Additional considerations: As a starting place, estimate criteria pollutants from tailpipe emissions including PM 2.5 and NOx from all EVs registered in a utility service area.

Electric vehicle adoption (860-087-0020(3)(c)(B))

Stakeholders agree to remove the proposed metric under this category as it covers data used throughout the TE plan and reporting and is readily available from state agencies.

Underserved community inclusion and engagement (860-087-0020(3)(c)(C))

2. Metric: Outreach, capacity building to and participation of underserved communities, low-income service providers, community-based and community service organizations, non-profit organizations, small businesses (particularly minority and women owned businesses), and tribes in the development and implementation of a utility TE portfolio.

   Type of metric: baselining metric

   Additional considerations: Metric may result in a qualitative description of how the utility has conducted these activities in the development and implementation of their TE portfolio.

Equity of program offerings to meet underserved communities (860-087-0020(3)(c)(D))

3. Metric: Percent of program-enabled ports by use case located within and/or providing direct benefits and services to underserved communities or communities identified using a Commission-approved tool.

   Type of metric: baselining metric

   Additional considerations: Use cases include residential, multifamily, workplace, corridor, non-corridor public, LDV fleet, and MHDV fleet. When possible, distinguish between public and private ports. Program-enabled ports do not include ports exclusively supported by line extension allowances.

4. Metric: For transit agencies who have participated in a utility EV program during the portfolio period, the transit agencies' annual service hours, number of routes, and number of routes serving underserved communities, to the extent this information is provided to the utility.

   Type of metric: tracking metric

   Additional considerations: Decisions regarding a transit agencies' annual service hours, number of routes, and number of routes serving underserved communities are generally outside of the utility's control. Tracking this metric is intended to assess complementary services (i.e. transit service and transit electrification) and identify gaps in services. This metric does not suggest that there is a correlation between transit service changes and electrification of buses.

5. Metric: Types of electric transportation technology supported by a utility portfolio as a percent of total investments, organized into categories such as micromobility, passenger vehicles, light-duty fleet vehicles, medium- and heavy-duty fleet vehicles, school buses, and transit buses.

   Type of metric: baselining metric

Distribution system impacts and grid integration benefits (860-087-0020(3)(c)(E))

6. Metric: Percent of program-enabled charging load that occurs off-peak, by use case.

   Type of metric: performance metric

   Additional considerations: Use cases include residential, multifamily, workplace, corridor, non-corridor public, LDV fleet, and MHDV fleet. When possible, distinguish between public and private ports. Program-enabled ports do not include ports exclusively supported by line extension allowances.

7. Metric: Total EV load enrolled in managed charging and potential for managed charging. Estimated percent of EV load enrolled in managed charging.

   Type of metric: performance metric

   Additional considerations: Managed charging includes direct load control, vehicle-to-grid, and behavioral demand response. Managed charging does not include time of use rates.

Program participation and adoption (860-087-0020(3)(c)(F))

8. Metric: Number of program-enabled ports by use case.

   Type of metric: performance metric

   Additional considerations: Use cases include residential, multifamily, workplace, corridor, non-corridor public, LDV fleet, and MHDV fleet. When possible, distinguish between public and private ports. Program-enabled ports do not include ports exclusively supported by line extension allowances.

9. Metric: Percent of total public ports by use case within utility service territory that are program-enabled.

   Type of metric: baselining metric

10. Metric: Number of participants in utility programs, broken down by program and underserved community status.

    Type of metric: baselining metric

Infrastructure Performance Including Charging Adequacy, Reliability, Affordability, and Accessibility (860-087-0020(3)(c)(G))

11. Metric: Price ($/kwh) to charge at program-enabled ports by use case.

    Type of metric: baselining metric

    Additional considerations: Use cases include residential, multifamily, workplace, corridor, non-corridor public, LDV fleet, and MHDV fleet. When possible, distinguish between public and private ports. Program-enabled ports do not include ports exclusively supported by line extension allowances.

12. Metric: Uptime at utility-owned and supported ports by use case.

    Type of metric: performance metric

    Additional considerations: Use cases include residential, multifamily, workplace, corridor, non-corridor public, LDV fleet, and MHDV fleet. When possible, distinguish between public and private ports. Program-enabled ports do not include ports exclusively supported by line extension allowances.

Types of metrics (as proposed by PGE):

Performance metric:

- Measures of direct outputs of utility activities
- Metric is mature enough to enable target-setting
- Can be used in reporting and assessment of portfolio success or sufficiency
- Utility forecasts metric performance for the proposed TE portfolio as part of the TE plan, then reports on progress
- Assessed at a TE portfolio level
- Related to programmatic activity and used in evaluation of TE portfolio

Baselining Metric:

- Measures of outputs of utility activities
- Metric is not yet mature enough to enable target-setting, or measures progress over a long time-horizon
- May be turned into a performance metric at some future point
- Not used in assessing portfolio success or sufficiency
- Utilities does not forecast metric performance, but does report on progress
- Related to programmatic activity, but not used in evaluation

Tracking Metric:

- Not used in evaluating the TE portfolio because utility programs and investment are not able to significantly influence that variable, or measurement is impractical
- Utility reports metric as part of TE plan
- Assessed at a state/service area level
- Included to track a key issue, but not used in evaluation