

Docket No. AR 654
Comments by Emerald Valley Electric Vehicle Association

Emerald Valley Electric Vehicle Association
EVEVA.org

March 17, 2022

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

Re: Docket No. AR 654 – Division 87 TE Rulemaking

Attached for electronic filing in the above-referenced matter, please find comments on behalf of Emerald Valley EVA. in response to Staff's proposed revisions to Division 87 Transportation Electrification rules, filed on March 3, 2022.

Please let me know if you have any questions.

Respectfully,

/s / Philip N Barnhart
Phil Barnhart
President
Emerald Valley Electric Vehicle Association

The Emerald Valley Electric Vehicle Association (EVEVA) is a voluntary association and chapter of the Electric Vehicle Association dedicated to educating the public about the value and usability of electric vehicles (EVs) and to increasing EV adoption by individuals, families and businesses. We are located primarily in Lane County but also have members and partners as far south as Ashland and as far north as Vancouver Washington.

In this comment we distill the major issues concerning EV adoption and use from our experience as EV drivers and as those involved in educating the public and dealing with the real and imagined fears that slow EV adoption.

The installation and proper operation and publicity of EV chargers is vital to our mission. EVs will only be adopted and used if there are convenient and operable EV chargers available where owners and operators live and work and where they travel.

The rules now being considered may have a major impact on the rate of adoption of EVs in Oregon and the success or failure of the Governor's 2020 executive order on climate. In Lane County, according to the county climate expert, 2/3rds of the locally emitted greenhouse gases (GHGs) come from using transportation fuels.

This comment is about distribution and availability of EV chargers and the need for the rules to provide for adequate distribution for charging at or near home and work and for requirements that public chargers be maintained so that they are available for convenient charging.

If you decide to allow installation of EV charging equipment using rate payer dollars, you must also have enforceable standards for maintenance and repair (O&M) so that chargers are actually available for use. No public charger should be out of use, except in a dire emergency, for more than a few hours. Even very large and successful vendors often fail to make repairs for days or weeks. When an EV arrives at a charging location and finds the available chargers do not work, it may make an emergency from a routine fueling stop. The story gets around and discourages others from buying EVs. Utilities and other charger vendors must have robust and measurable resources and processes in place to operate and maintain their equipment with repairs done very very quickly.

Similarly, charging sites must have a large number of operational chargers in each location. Having only one or a few chargers available means that EV drivers cannot rely on that site because of the high probability that another EV is charging on arrival. The Tesla Supercharge system is a good model for actual availability. Even with robust use, there is nearly always a charger available for Tesla EVs. Inconvenience of one or two

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broken chargers is mitigated by the large number left available. Tesla often installs service that will allow for adding more chargers later. That should also be part of the plans when EV charging is planned anywhere at least until all parking spaces have charging available.

Current distribution of public fast chargers is primarily along major transportation corridors at major retail outlets. That leaves charging deserts in other locations especially near clusters of multi unit dwellings (MUDs) and work settings. Apartment dwellers will not adopt EVs unless there is adequate, convenient, and available charging in their apartment parking or very nearby. A less convenient but usable alternative would be direct current fast chargers (DCFCs) available at the often small shops where they do business and can charge quickly while shopping. (Thanks to SBUA for this insight). Workers in all locations, large and small need level 2 chargers available at employee parking especially if they live in MUDs and cannot charge at home.

If you adopt a requirement that different rate classes (residences, small business, large business) should not be subsidizing one or the other, some charging will become available in the current charging deserts which will promote the adoption of EVs because they are convenient to more and lower income households.

Your rules should reflect the need for public level 2 EV charging where vehicles are stored at night or while their owners are at work. Overnight or work time charging is easily accomplished where an EV can be plugged in and ignored for several hours at a time. Where that kind of availability is not practical, DCFCs must be available where low and moderate income drivers spend 30 minutes to an hour in their neighborhoods, such as small shopping centers and the like. To be available means that the chargers are regularly maintained and rapidly repaired when necessary and are low priced enough to attract EV users on a budget.

I thank the staff for the work preparing the proposal.

Sincerely,

/s / Philip N Barnhart

Phil Barnhart

President, Emerald Valley Electric Vehicle Association

eveva.org