



# Oregon Citizens' Utility Board

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Public Utility Commission  
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## **RE: UM 2056 – CUB Comments on PacifiCorp's Draft Transportation Electrification Plan**

The Oregon Citizens' Utility Board (CUB) appreciates the opportunity to comment on PacifiCorp's (PAC or the Company) draft Transportation Electrification (TE) Plan. CUB provides input on several pieces outlined below and offers comment for PAC's consideration when developing the Company's final TE Plan.

### **Public Utility-Owned Infrastructure Pilot Program**

CUB has considered the tradeoffs of utility-owned and operated electric vehicle supply equipment (EVSE) versus third-party owned and operated EVSE in several different venues over the years. In the context of this proceeding, CUB discussed the merits of both EVSE ownership models with a wide variety of stakeholders. After careful consideration, it remains unclear to CUB which ownership model is best for utility ratepayers. The superior option may be circumstantial and depend on the EVSE location, customer base, and type of charging equipment (slow Level-2 (L2) versus direct-current fast charging (DCFC)). That said, given available information, CUB considered under what circumstances utility-operated EVSEs are likely to be the best option. CUB requests that PAC explore the viability of both ownership options as it moves forward with the development of its final TE Plan.

In coming to this determination, CUB considered a variety of factors. In significantly underserved areas with higher percentages of low-income individuals, renters, or individuals primarily living in multifamily residential dwellings, it may be preferable to retain some level of utility involvement in EVSE ownership. This would allow for greater regulatory control and oversight over the charging rates provided, which can help increase equitable access to public charging infrastructure. Conversely, in areas that are less underserved, ratepayers as a whole may benefit from the decreased up-front capital costs and ongoing maintenance costs associated with a third-party EVSE ownership model. A blend of both models, depending on the location and use case, may ultimately prove to be optimal in the long-run. CUB takes no firm position at this time, but looks forward to reviewing other stakeholders' comments and PAC's future analysis.

## ***Multifamily Residential***

As indicated, CUB is inclined to support utility rate-regulated models<sup>1</sup> for EVSEs (particularly L2 chargers) located at multifamily residential locations. Charging at multifamily residential locations makes for a unique case. According to the U.S Department of Energy, 80% of charging occurs at home because it is the most convenient and low-cost option.<sup>2</sup> CUB is concerned that multifamily residential customers will be relatively captive clients of the EVSEs located immediately near their residence.

It would be unreasonable to expect customers to park and charge their EVs for several hours or overnight far from home on a regular basis. If only one L2 charging vendor is available for regular overnight charging at a customer's multifamily residence, and the charging rate is not regulated, then price gouging could ensue. This would also lead to a disparity between what suburban EV drivers pay to charge their EV at their garage (utility rate-regulated) and what urban customers pay at privately-operated EVSEs at their multifamily dwelling. While suburban and rural EV owners have the option to avail themselves of L2 charger rebates, install their own L2 charger, and procure utility rates for EV charging, urban customers in multifamily dwellings will likely not have this option. CUB supports a multifamily EVSE charging model that would most closely mirror what single-family dwellings are able to accomplish—i.e. charge at their leisure at something close to the utility retail rate.

CUB is most concerned for EVSE customers living in affordable housing. At typical multifamily dwellings, excessively high, unregulated EVSE rates could conceivably discourage residents from living at that location. However, moving may not be feasible for residents of affordable housing, meaning low-income customers could be captive to rates at nearby EVSEs and particularly vulnerable to price gouging.

Furthermore, sites near affordable housing may be undesirable to private EVSE owners/operators, who will presumably prioritize locating EVSEs in communities with high EV adoption first. Locating utility rate-regulated EVSEs near affordable housing would enable the utility to provide low-income rate schedules to qualifying customers should this become a possibility in the future.

All told, CUB considers the placement of utility rate-regulated EVSEs, particularly L2 ports, near low-income multifamily dwellings as an important component of meeting the HB 2165 mandate to prioritize serving historically underserved communities.

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<sup>1</sup> Whether this necessitates utility ownership of the EVSE is uncertain and CUB is open to exploring alternate possibilities, such as a utility serving as a site host with rate-making authority over third-party-owned EVSEs.

<sup>2</sup> <https://www.nrel.gov/docs/fy21osti/78540.pdf>

## *Mapping and Composite Scoring*

CUB has several suggestions regarding the Company’s mapping analysis and other efforts to direct service to historically underserved communities in accordance with HB 2165 through its Public Utility-Owned Infrastructure Pilot Program.

1. Through the Public Utility-Owned Infrastructure Pilot Program, the Company plans to construct 12-13 “charging stations”, typically 4 DCFC ports and 1 dual port L2 charger, and 106 dispersed L2 chargers. CUB would appreciate discussion of the following suggestions in PAC’s next round of comments in this proceeding.
  - a. Please distinguish between the intended uses of charging stations versus dispersed L2 chargers.
  - b. Please discuss how the intended uses of charging stations and L2 chargers affect the siting criteria for each type of EVSE.
  - c. What outreach initiatives has the Company undertaken to identify the infrastructure needs (DCFC versus L2) and preferred location (near multifamily dwellings, schools, workplaces, or other places community members park for long periods) for DCFC and L2 charging equipment?
  - d. In Section VII, page 27 of the Utility Program draft plan, the Company states that locations for the 106 non-charging-station L2 chargers have not been identified. In Table 13 on page 35 of the draft plan, the Company labels L2 chargers as “Workplace L2”. Does the Company intend to only site the 106 dispersed L2 chargers at workplaces, or would the Company also consider siting L2 chargers at multifamily residences, where most slow charging is likely to occur?
2. The siting process of the Public Utility-Owned Infrastructure Pilot Program seems focused on locating the charging stations as opposed to the 106 dispersed L2 ports. Several important considerations are more relevant to siting the charging stations than siting the dispersed L2 ports. The charging stations have unique before-the-meter distribution system infrastructure requirements, limiting the number of cost-effective locations for charging stations. Additionally, charging stations in particular will be most used and useful in highly trafficked transportation corridors, where the DCFC ports are most useful. CUB appreciates the Company’s efforts to integrate these factors, along with serving historically underserved communities, into siting charging stations.

However, the dispersed 106 L2 ports have fewer before-the-meter infrastructure requirements and don’t necessarily need to be in transportation corridors. For these ports, CUB sees an opportunity for the Company to locate EVSEs more flexibly in accordance with HB 2165 provisions to serve underserved communities. CUB proposes that the Company modify their mapping and siting methodology for the dispersed L2 ports to prioritize sites that are readily accessible to residents of low-income multifamily dwellings.

To help identify priority counties for L2 ports, please provide mapping and composite scoring analyses that double the weight of the “lower income” and “rental or multifamily housing” county attributes.

To help identify sites for L2 chargers within priority counties, we encourage PAC to consider identifying community delegates or liaisons, who are knowledgeable of the unique needs of underserved community members, to help select specific sites. This concept is discussed further in the Equity and Community Outreach section of our comments.

CUB also encourages the Company to consider drawing from the siting process used by Seattle City Light, which involved gathering direct input from customers about where to locate curbside L2 charging<sup>3</sup>.

Lastly, CUB would like to thank the PacifiCorp TE team for being available to discuss various mapping and composite scoring techniques for siting EVSEs. CUB appreciates the challenge the Company faces in balancing numerous siting factors in addition to identifying priority locations to best serve underserved communities and looks forward to ongoing engagement over EVSE siting.

### **Residential Managed Charging Program Pilot**

CUB is pleased to see the Residential Managed Charging Program Pilot included in the Company's TE Plan and looks forward to gaining insights about the potential of managed charging as a demand response measure. Beyond managed charging, is PacifiCorp also planning to examine the potential of vehicle to grid charging? In the Case Study which will come out of the Residential Managed Charging Program Pilot, will PacifiCorp address the potential of vehicle to grid charging based on data retrieved through the Residential Managed Charging Program Pilot? CUB would appreciate narrative responses to these questions in PAC's forthcoming round of comments.

CUB appreciates PAC's interest in connecting with DEQ to highlight available rebates on Level 2 chargers. It makes sense to include charger options to customers who are already in the process of buying an electric vehicle. CUB believes that Level 2 chargers have major grid benefits including allowing customers to charge during off-peak hours. CUB believes that criteria for Level 2 charges should be evenly distributed throughout PAC's service territory to allow for all customers to take advantage of rebate opportunities.

### **Equity and Outreach**

HB 2165 highlighted the importance of equity, education and outreach when looking at TE investment and infrastructure development. CUB believes that ensuring opportunities are accessible, distributed across PAC's service territory, and include multiple community contacts and connections will lead to better infrastructure placement and better understanding of barriers not known to the Company.

With this, CUB is interested in how the Company is viewing community connections and outreach given the implementation of HB 2165. This legislation, along with other legislative implementation processes at the PUC and within the utility, direct the Company to include and

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<sup>3</sup> <https://www.seattle.gov/city-light/in-the-community/current-projects/curbside-level-2-ev-charging>

evaluate new opportunities, barriers, and areas of consideration. CUB would like to hear how this has informed PAC's outreach efforts or if the Company sees additional opportunities coming from these new directives.

### ***Addressing Market Barriers***

CUB appreciates PAC's breakdown of the market barriers seen across the Company's service territory and believes that education and investment to help address these barriers is an important step in the future of transportation electrification. CUB encourages PAC to ensure that when addressing these market barriers that the Company ensures that outreach and opportunities are distributed across PAC's entire service territory as evenly as possible.

Along with ensuring these opportunities are available across PAC's service territory, education should be accessible. This includes ensuring that presentations, education materials, and websites are available in Spanish or any other major language within PAC's service territory.

CUB encourages PAC to utilize community organizations and individuals to help with setting up and hosting educational events, as well as helping to define and highlight local barriers that may be less noticeable to the Company. CUB is especially interested in PAC's collaboration with organizations that serve underserved communities across its service territory. CUB hopes that PAC will consider connecting with organizations that are working in other Company proceedings (HB 2021 and HB 2475 implementation) or organizations part of the Utility Community Benefit and Impacts Advisory Groups (UCBIAG) in the Clean Energy Plan process as a starting point for connection. CUB believes it is essential to consider the input of community-based organizations and individuals when addressing market barriers, rather than solely relying on feedback from the business community.

### ***Public Transit***

CUB is pleased with PAC's participation in the West Coast Clean Transit Corridor Initiative and the Company's interest in continuing to work on electric transit opportunities. CUB highlights the importance of school and public transit as an important opportunity with transportation electrification and a key piece to the implementation of HB 2165. Again, CUB underscores that the investment in transit infrastructure should look at opportunities across PAC's full service territory, especially in areas that are underserved or remote that rely heavily on public transit.

CUB accentuates the importance that transit investment should serve underserved populations, communities of color, and low-income communities. There is a concern that oftentimes these services can be housed in the aforementioned communities that ultimately do not directly service the community. CUB encourages PAC to ensure that when investing in electric transit infrastructure that it directly serves underserved communities.

### ***Community Delegates***

CUB appreciates that PAC is interested in connecting with community members when looking at investment opportunities for TE infrastructure. In stakeholder conversations, we have heard that PAC hopes to utilize the UCBIAG groups from the Clean Energy Plan process. CUB believes that these organizations can help PAC's TE investment in highlighting areas of community potential for utility owned investments and areas where they think chargers could be placed.

CUB acknowledges the ongoing relationship with the Regional Business Manager program and the Company. CUB highlights the need for the Company to continue to invest in low-income community connections. CUB is concerned that regional business managers may not be as closely connected to the barriers and concerns that underserved communities, the environmental justice community, communities of color, or other low-income communities and customers may face or see in transportation electrification. CUB encourages PAC to engage with other avenues to connect with community members and organizations that better reflect these communities.

CUB encourages PAC to engage with advocates in the HB 2021 and HB 2475 implementation and investigation processes on transportation electrification issues, as well as other organizations directly connected with these communities that are often less represented in infrastructure and investment discussions to understand specific barriers, opportunities, or areas of concerns that affect their communities.

### **Conclusion**

CUB appreciates the work that PAC has completed in this draft TE Plan. We support PAC's direction with their initial filing and offer our comments for further clarification and detail in the final plan. We are encouraged by the engagement that we have had with PAC's team thus far and look forward to continuing to work with the Company, advocates, and Staff to address questions, concerns, and opportunities available to strengthen the Company's transportation electrification investments. We recognize this is an evolving and iterative process and look forward to further discussions and the subsequent filing of PAC's TE Plan.

Respectfully submitted,

*/s/John Garrett*

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