

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF OREGON

Docket No. UM 2056

**IN THE MATTER OF PACIFICORP, d/b/a PACIFIC POWER, OREGON
TRANSPORTATION ELECTRIFICATION PLAN**

COMMENTS OF CHARGEPOINT, INC.

ChargePoint appreciates the opportunity to provide comments on Pacific Power Transportation Electrification (“TE”) Plan (“Plan”), filed in compliance with the Oregon Public Utility Commission’s (“Commission”) Order No. 19-134.

ChargePoint is the world’s largest and most open electric vehicle (“EV”) charging network with more than 110,000 Level 2 and direct current fast EV charging spots, including over 700 ports in Oregon. ChargePoint designs, develops, and deploys residential and commercial AC Level 2 (“L2”) and DC fast charging (“DCFC”) electric vehicle charging stations, cloud-based software applications, data analytics, and related customer and driver services aimed at creating a robust, scalable, and grid-friendly EV charging ecosystem.

ChargePoint applauds Pacific Power’s efforts to foster a competitive market for EV charging, offer demand charge relief, and educate customers, and looks forward to ongoing collaboration on these efforts. We support the Plan as filed and offer the following recommendations to further the goals outlined by the Commission and SB 1547.

I. Pacific Power can and should support the development of the private EVSE market, while not undercutting the competitive market.

ChargePoint appreciates Pacific Power’s desire to “support the development of the private EVSE [electric vehicle supply equipment] market” and efforts to not “undercut the competitive market as it develops in the region”.¹ ChargePoint also appreciates Pacific Power “actively working with EVSE developers, stakeholders, and policymakers to ensure a thoughtful, strategic approach in the role it takes,” and welcomes the opportunity to work hand-in-hand with these parties to foster a competitive market for EVSE in Oregon.²

ChargePoint believes that utility programs are most effective when they support customer choice, competition, and innovation in charging stations and network services. To this end, ChargePoint asserts that appropriate support from utilities include 1) rebates for residential and commercial customers to purchase smart, networked chargers, and/or 2) make ready programs that allow the utility to invest in and own the lines, wires and conduit (collectively known as “make read”) necessary to install a charger. Rather than a “one-size, fits-all” solution, incentives

¹ Plan, p. 25.

² *Id.*

should enable site hosts to choose the EV charging equipment and network that works best for them. Doing so supports a competitive EV charging market that provides innovative products to meet customers' needs.

ChargePoint notes that the capital cost of installing EVSE can exceed equipment costs, particularly in older properties and rural areas. These capital costs are largely attributable to trenching and make ready needed to make a parking space ready to install a charging station. Providing incentives for, or investing in, make ready on the customer's side of the meter can help overcome this barrier by lowering the charging station site host's costs of deploying EVSE. We are pleased to see Pacific Power is considering a make-ready fleet incentive program³ and urge Pacific Power to consider offering make-ready infrastructure incentives more broadly for public L2 and DC fast charging in its service territory.

II. Pacific Power can play a critical role in demand charge relief to help make EV rates more attractive to its customers.

ChargePoint supported Pacific Power's effort to, "[Design] a custom electricity rate for EVSE stations that shifts costs toward energy charges from demand charges to make the prospect of developing and operating EVSE more financially viable."⁴ This rate, Schedule 45, was approved in Docket No. ADV 485 and made Pacific Power a leader in EV friendly rate design. ChargePoint customers have utilized this rate to operate and host public DC fast chargers and, as noted in the annual report,⁵ it has resulted in significant cost savings.

ChargePoint notes that rates for operators of DCFC stations can impose disproportionately high costs on customers sponsoring low utilization charging equipment. With very few exceptions (e.g. for very small customers) commercial customers are on rates that include demand charges that are based on the customer's highest measured demand, measured in kilowatts (kW) in a given month. This impact is amplified for fleets and other customers that require charging at high power levels and/or that do not have flexibility to adjust the timing or duration of charging sessions. For DCFC sites, conventional commercial rate design often can make otherwise viable and desirable projects uneconomic.

An EV rate that enables a site host to financially justify investment in public DCFC infrastructure, such as Schedule 45, benefits the broader goal of expanding access to charging. As EV charging access expands, more drivers "go electric." The same rationale is true for fleet operators. ChargePoint interacts every day with businesses that are interested in electrifying their fleets. The cost of electricity and the impact of demand charges is a central question that may determine whether or not a business or public agency decides to invest in electric vehicles. A rate that motivates investment by one large customer can have exponential benefits as awareness of EVs and the affordability of EV charging grows within an industry or in a geographic area. ChargePoint encourages Pacific Power to explore offering a rate designed with fleet operators in mind.

³ Plan, p. 48.

⁴ Plan, p. 25.

⁵ <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=22132>

Finally, ChargePoint appreciates that Schedule 45 is optional for customers. ChargePoint supports making all EV-specific rates optional because at this point in market development the focus should be on ensuring that every customer contemplating investment in EV charging stations is able to access whatever applicable rate is best for their circumstances and load profile.

III. Low- and Moderate-Income Customers Should be Prioritized in Customer Outreach

ChargePoint appreciates Pacific Power's focus on outreach and education.⁶ To the extent that additional EV and EVSE incentives are designed and approved, (1) customer input should be solicited to ensure that program goals meet community needs and (2) approved program details are provided to all customers. However, utilities should not promote specific brands or types of EVs to preserve and support the competitive nature of those industries.

Importantly, Pacific Power is in an excellent position to help educate utility customers, especially low- and moderate-income customers, about the benefits of EVs, and this should be a priority in customer outreach overall.

We greatly appreciate the opportunity to review Pacific Power's Plan in advance of the program filing to provide an opportunity for a collaborative process to work on the Plan with a broad cross- section of stakeholders.

Thank you for your consideration of our comments. Please do not hesitate to contact me at alexandra.leumer@chargepoint.com if you have any questions or if we can provide additional information to help inform the Plan.

Sincerely,

Alexandra Leumer

Director, Public Policy, ChargePoint

⁶ Plan, p. 49.