



Portland General Electric

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December 10, 2021

Via Electronic Filing

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

Re: UM 2165, Investigation into a Transportation Electrification Investment Framework

Filing Center:

Portland General Electric (PGE) has appreciated the opportunity to participate in and offer follow-up comments throughout the UM 2165 investigation into a Transportation Electrification (TE) Investment Framework (TEIF). As the Commission reviews Staff's final TEIF recommendations at the Regular Public Meeting on December 14, 2021, PGE would like to emphasize that we find many reasons to support Staff's proposed framework. We commend Staff for their work and their inclusive approach to these matters and are committed to continued engagement with Staff and stakeholders as we seek to resolve specific questions and issues in the coming months. In that spirit of constructive engagement, we ask that the Commission consider these additional thoughts in its deliberations:

1. **Infrastructure spending "guardrail"** - We agree with Staff's recommendation that utilities augment and update the data used to develop the Oregon Department of Transportation's 2021 Transportation Electrification Infrastructure Needs Analysis (TEINA) to inform specific utility service territory actions and investment. As Staff explains, with some adjustments the TEINA's methodology can be used to establish the maximum infrastructure need for public charging in PGE's service territory. But it is important to note the TEINA does not forecast appropriate levels of expenditure or prioritize investments, and its focus is on infrastructure, not programmatic approaches to meeting and accelerating EV adoption. It does not address the complexity of customer and market behavior, necessary engagement, education, or meeting the needs of traditionally underserved or low-income communities. We suggest removing language that could limit investment in these additional areas. We anticipate working with Staff and stakeholders, using the TEINA model and other sources of data, to establish these critical elements of our TE investment strategy.
2. **Portfolio performance areas** - PGE endorses the need for the Company to work with Staff and stakeholders to articulate clear, specific, measurable, and time-bound goals to report on TE portfolio performance and provide transparency and accountability so Staff can track expenditures and ratepayer benefits. We look forward to working through the specifics of how these will be developed and implemented during Staff's proposed quarterly TE workshops and in the Division 87 rulemaking process and expect to build on dialogue already begun with Staff and stakeholders during the UM 2165 process. We note, however, that Staff's memo seems to suggest continued use of attribution to quantifiable market adoption and greenhouse gas reductions. While attribution is a metric used when assessing market transformation, related investments, like those of the Northwest Energy Efficiency Alliance (NEEA), are generally coordinated across a regional market. We agree with Staff that market

indicators and planful activity to address market barriers are important parts of TE programs and a TE Plan, but we are reluctant to revisit attribution as a utility performance indicator. Continued discussion and analysis by utilities, Staff and Stakeholders is needed to develop appropriate portfolio performance measurement tools, including identification of best practices and performance indicators, before the Commission offers direction on specific portfolio performance measures.

3. **Benefit/cost analysis** – PGE appreciates Staff’s recognition that traditional cost tests typically fall short in evaluating TE programs and investments and agrees with their proposed near-term approach of using benefit-cost analysis to provide perspective on utility TE proposals without being determinative. We look forward to working with Staff and stakeholders to explore development of a broader, jurisdiction-specific and tailored Societal Cost Test to evaluate utility TE investments in the long term, but we note that it is not a foregone conclusion that a cost test can be established that will be fully applicable to all TE investments.
4. **TE planning process** – PGE supports Staff’s recommendations for a holistic biennial planning process and anticipates working with Staff and stakeholders to determine the level of detail TE Plans should include, and also to establish clearer guidance on what acceptance of a TE Plan means for planned activities and prudence review of budgeted expenditures. We recommend that specific filing deadlines for the TE Plan and TE Plan Report be resolved in the upcoming Division 87 rulemaking.
5. **Rescission of Order No. 18-376** – PGE supports holistic TE planning that draws upon programs funded by residential Clean Fuels Program (CFP) credits as context in considering broader utility TE portfolios. However, rescission of the CFP Order was not explicitly explored during the UM 2165 workshops and has not had the benefit of full analysis by Staff and stakeholders. We recommend the Commission leave the Order in place until alternative guidance for the use of CFP funds can be developed, if stakeholders and Staff determine that a different approach is necessary.

Conclusion

PGE looks forward to working with OPUC Staff and stakeholders on revisions to the Division 87 rules relating to TE programs to reflect legislative intent found in House Bill (HB) 2165 and HB 3055 as well as Staff’s proposed TEIF. We are encouraged by the robust Staff and stakeholder engagement experienced in these and related activities such as TE meter charge discussions.

We thank Staff for their collaborative and inclusive approach throughout the UM 2165 process and anticipate proceeding along the same lines as we embark on TEIF implementation, as well as PGE’s preparation of a new TE plan for filing later in 2022. Please let us know if you have questions, suggestions, or need clarification regarding any of the above.

Thank you,

/s/ Karla Wenzel

Karla Wenzel
Manager, Regulatory Policy & Strategy