



AR 654 – Division 87 Rulemaking

Public Workshop: Reviewing Comments on Draft Rules

April 1, 2022

Operating Agreements

1. Be energy efficient. (Allow room for multiple perspectives. Leave time for everyone.)
2. Stay engaged (connected) without tripping the circuit breaker. (Don't overheat.)
3. Consider environmental conditions. (Mute when not speaking.)
4. Seek understanding. (Listen to understand, not to respond.)
5. Group Norms. (Suggestions from participants.)

Who's Who

Hosts and Presenters (OPUC)

Sarah Hall, Resource & Programs Development Manager

Ezell Watson, Director of Diversity, Equity and Inclusion

Eric Shierman, Senior Utility Analyst

Jill Goatcher, Assistant Attorney General, DOJ

Who's Who

Please introduce yourselves in chat.

Name and any organizational affiliation

AR 654 Docket Schedule

Date	Description
April 1	Public workshop to discuss stakeholder comments on revised Division 87 rules, and Staff response
Week of April 4	Revised draft rules posted to docket
April 11	Written comments due on second revision to draft rules
April 27	Staff Report published with recommended draft rules and request to open formal rulemaking
May 5	Staff Report presented to Commission at Public Meeting
May – July	Formal Division 87 rulemaking phase
August 2022	Revised Division 87 rules effective

Today's Discussion: Key Topics Addressed in Comments

- Stakeholder review of TE Plans
 - Aligning Commission actions of 'acceptance' and 'approval'
 - Cadence of TE Plan filing from 2 to 3 years
 - Budget determination, forecasted funding
 - Purpose of TE Plan Report
 - Portfolio performance areas
 - Level of detail
 - Addition of reliability, uptime metrics, payment standards
 - Treatment of Clean Fuels Program within TE portfolios
- Definitions in rules

Stakeholder comments and Staff response cited are posted to Docket No. AR 654

<https://edocs.puc.state.or.us/efdocs/HAC/ar654hac17143.pdf>

Staff Supports

- Remove definitions for terms not referenced in the text
- Add definitions for Plan objective
 - Joint Parties: add “prioritize load management, and provide benefits for underserved communities.”
 - PGE: clarify scope of budget
- Provide language about how stakeholders will be included prior to filing
- Add “reliability” to the requirement to present data on charging stations

Staff Supports

- Define relationship between Plan acceptance, Budget, program and infrastructure measure approvals
- Three-year planning cycle
 - Requires updated EV adoption forecasts on "off-DSP years"
 - Report
 - Annual, and Final with evaluations
 - Assessment and expenditures
 - "Update" filings for material changes
- Clarify inclusion of private infrastructure
- Clarify difference between “spending” and “line-item expenditures”
- Add subsection for applications to requiring analysis of impact on innovation, competition, and customer choice

Discuss Further with Stakeholders

- Clarify "material" changes
 - Require
 - Address in Report
 - Replace “material” with “new or significant”
- Reduce detail in program application
- Performance metrics
- Require discussion of state policies and programs
- Description of technical requirement

Discuss Further with Stakeholders

- Require payment method standards and language accessibility requirements at charging stations.
- Require utilities to include:
 - Explanation of how infrastructure measures will benefit underserved communities
 - Estimated net revenue attributed to the TE portfolio

Recommended for Guidance Document

- Consider using the UCBIAG as forum to consult with stakeholders prior to filing to streamline existing processes
- Excluding PGE and PAC's own fleet electrification from TE Plan and Budget
- Other areas?

AR 654 Next Steps

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Submitting Public Comments

- By email – PUC.FilingCenter@puc.oregon.gov Include “COMMENTS – DOCKET NO. AR 654” in subject line
- By Mail – Oregon Public Utility Commission, Attn: AR 654 Public Comment, PO Box 1088, Salem, OR 97308-1088
- By Phone – 503-378-6600 or 800-522-2404 or TTY 800-648-3458, weekdays from 8 a.m. - 5 p.m. Pacific Time

Thank You

Staff Contacts

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