## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## UM 1811

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In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY,

Application for Transportation Electrification )
Programs
)

ELECTRIC VEHICLE CHARGING ASSOCIATION PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Electric Vehicle

Charging Association ("EVCA") petitions the Oregon Public Utility Commission (the

"Commission") to intervene and appear with full party status. In support of this petition

to intervene, EVCA provides the following information:

The name and address of EVCA is:

Terry O'Day Electric Vehicle Charging Association 11390 West Olympic Blvd. Suite 250 Los Angeles, CA 90064 Terry.ODay@evgo.com

Sanger Law, PC will represent EVCA in this proceeding. All documents relating

to these proceedings should be served on the following persons at the addresses listed

below:

Terry O'Day Electric Vehicle Charging Association c/o EVgo Services LLC 11390 West Olympic Blvd. Suite 250 Los Angeles, CA 90064 Terry.ODay@evgo.com Irion Sanger Sanger Law, PC 1117 SE 53rd Avenue Portland, OR 97215 Telephone: (503) 756-7533 Fax: (503) 334-2235 irion@sanger-law.com

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EVCA is a non-profit organization that brings together leaders in the electric vehicle charging industry to educate policymakers, stakeholders and members of the public about the critical role of electric vehicle ("EV") technology, infrastructure and services, and to advocate for policies that will expand clean transportation. EVCA promotes the principles of innovation, technology-neutral strategies and customer choice to make charging convenient, ubiquitous and affordable, and to build a positive experience for EV drivers everywhere. EVCA's members represent a diverse array of EV related companies, including those that sell, own, install, service and maintain charging stations and power distribution units, support the commercialization of new alternative fuel and renewable energy technologies, and develop and operate software for the management of charging stations and EV drivers.

EVCA has a substantial interest in this proceeding, because it will potentially adopt a long-term strategy for transportation electrification in PGE's service territory. This proceeding will directly impact the future of growth and adoption of EVs as well as the opportunities for non-utility owners of EV infrastructure and services, which are core issues for EVCA.

EVCA has participated in numerous proceedings regarding EV issues in other states, and its members offer deep, collective expertise on all aspects of EV charging, including the issues in this proceeding. EVCA's attorneys have participated in numerous Oregon Commission proceedings regarding energy related regulation.

The Commission "shall grant" a petition to intervene before the final taking of evidence in a proceeding if the appearance and participation will not unreasonably broaden the issues, burden the record, or delay the proceeding. ORS 756.525; OAR 860-001-0300. EVCA has a statutory right to intervene that this stage of the proceeding because the final taking of evidence has not occurred in this proceeding and the record has not yet been closed.

EVCA understands that testimony has been filed in this proceeding and that settlement conferences are ongoing. EVCA will not burden the record or seek any delay in the proceeding due to the filing of this petition to intervene at this stage of the case. Thus, EVCA's intervention will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Finally, EVCA's interest are not adequately represented by any other party in this proceeding.

WHEREFORE, EVCA respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

## EVCA'S PETITION TO INTERVENE

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Dated this 9th day of June 2017.

Respectfully submitted,

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Attorney for the Electric Vehicle Charging Association