

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2003

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE
COMPANY,)	OF GREENLOTS
)	
Application for Deferral of Costs and Revenues)	
Associated with the Electric Vehicle Charging)	
Pilots.)	
_____)	

Greenlots hereby petitions the Oregon Public Utility Commission (“the Commission”) to intervene in this proceeding, pursuant to ORS § 756.525 and OAR § 860-001-0300(2), with fill party status as defined in OAR § 860- 001-0010(7). In support of this petition, Greenlots submits as follows:

1. The business address of Greenlots is:

Greenlots
777 S. Alameda Street, 2nd Floor
Los Angeles, CA 90021

2. Greenlots request that the service of documents be made, preferably via email, on:

Thomas Ashley
VP Policy
777 S. Alameda Street, 2nd Floor
Los Angeles, CA 90021
tom@greenlots.com
802.922.5585

3. Greenlots is a leading provider of electric vehicle (“EV”) charging software and services committed to accelerating transportation electrification in Oregon. The Greenlots network supports a significant percentage of the direct current fast charging (“DCFC”) infrastructure in North America, and an increasing percentage of the Level 2 infrastructure.

Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.

4. Portland General Electric Company's ("PGE") February 15, 2019 filing requests deferral of the treatment of costs and revenues related to two new Electric Vehicle Charging Pilots to a later ratemaking, in addition to deferral of related operation and maintenance costs. These two pilots were filed according to Commission guidance in Order 18-054 on February 16, 2018.

5. As a provider of EV charging equipment, software and services to both consumers and utilities, Greenlots' has a direct and substantial interest in this proceeding and the pilot programs that PGE has proposed. Specifically, Greenlots has a significant interest in the growth of electric vehicle charging infrastructure, the role of utilities in scaling the market for electric vehicle charging infrastructure, the market and business prospects for providing this infrastructure and services, and in the development of programs and pilots which address and affect these issues.

6. Greenlots has experience participating in proceedings before the Commission, and Greenlots' intervention in this proceeding will assist the Commission in its decision-making. Additionally, Greenlots' participation will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

7. Greenlots has direct and substantial interest in this proceeding that will not be adequately represented by any other party. Additionally, Greenlots' business interests as described above may be affected by Commission determinations made during this proceeding. Moreover, given Greenlots' extensive and multi-jurisdictional experience and perspective on

market development and regulatory matters pertaining to electric vehicles and charging infrastructure, it is in the public interest to allow Greenlots to intervene in this proceeding.

For these reasons, Greenlots respectfully requests that the Commission grant Greenlots' petition to intervene in this proceeding with full party status.

Respectfully submitted,

/s/ Thomas Ashley

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DATED: March 7, 2019