

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1811

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Transportation
Electrification Programs.

ORDER

DISPOSITION: AMENDED STIPULATION ADOPTED

I. SUMMARY

In this order, we adopt the amended stipulation of the Stipulating Parties¹ which modifies the terms of PGE's transportation electrification pilot programs. Through the amended stipulation, attached as Appendix A to this order, the Stipulating Parties resolved all issues regarding modifications to the earlier stipulation related to pilot programs for residential home charging and business fleet charging and associated regulatory accounting issues. We adopt the amended stipulation and encourage more steps toward realizing the legislative goals of increased transportation electrification.

II. PROCEDURAL HISTORY

PGE filed its original application for Transportation Electrification Programs on December 27, 2016, and supplemented the application and provided supporting testimony on March 15, 2017. A broad range of parties actively participated in the review of PGE's application and a stipulation among most of the parties was executed on June 27, 2017. Two parties objected to the stipulation, and a hearing was held on October 10, 2017. In Order No. 18-054, entered February 16, 2018, we adopted a stipulation that authorized

¹ Portland General Electric Company (PGE), the Staff of the Public Utility Commission of Oregon, Oregon Citizens' Utility Board, the Alliance of Western Energy Consumers, Tesla, Inc., Tri-County Metropolitan Transportation District of Oregon (TriMet), Forth, and GreenLots. The Oregon Department of Energy was not a signatory to the amended stipulation, but did not object to it.

PGE to undertake three pilot programs designed to accelerate transportation electrification. These programs included a public transportation pilot with TriMet, an education and outreach program, and a proposal to build up to six additional utility-owned charging stations. We also adopted the stipulation's agreement for PGE to propose two additional pilot programs for residential and workplace charging for our later consideration. PGE agreed to propose a residential charging pilot that used rebates and time-of-use rates to encourage level 2 home charging. The workplace charging pilot was to be funded by reallocating approximately \$1 million in funds from the proposed "Education & Outreach" activities. We modified provisions in the stipulation addressing future meetings and processes related to developing specific learnings from PGE's pilot programs.

On April 5, 2018, Staff filed a report on finalized learnings for PGE's three transportation electrification pilots. We adopted that report on April 12, 2018, in Order No. 18-124.

In February 2019, PGE filed an application for transportation electrification programs, including a Residential Electric Vehicle Charging pilot program and a Business Electric Vehicle Charging pilot program. The business charging program proposed to target, along with public transit agencies, "[b]usiness charging at workplaces, multifamily dwellings, multitenant buildings, destination centers (e.g. big-box retail), and fleets."²

On September 11, 2019, PGE and Staff filed a joint motion to adopt an amended stipulation that sought to change provisions of the original stipulation that we had adopted with modifications in Order No. 18-054. The joint motion explains that, upon reviewing PGE's proposed programs, "Staff and Intervenors' comment[ed] that the residential and business charging pilots did not comply with the terms of the Original Stipulation because they did not require customers to go on a time-of-use schedule and exceeded the stipulated cost cap, respectively[.]"³ Following "lengthy discussions," parties agreed to modify the original stipulation and PGE agreed to revise its program proposals.

III. TERMS OF THE AMENDED STIPULATION

All the terms in the amended stipulation relate to the two additional residential and workplace charging pilot programs discussed in paragraphs 30 and 31 of the original stipulation. Those original paragraphs are, as follows:

² PGE UM 1811 Transportation Electrification Compliance Filing at 1 (Feb 15, 2019).

³ PGE and Staff Joint Motion to Adopt Amended Stipulation at 2-3 (Sept 11, 2019).

30. PGE agrees to propose a residential home charging pilot, which includes rebates for customers installing a connected level 2 home charger and going on a time-of-use rate schedule, within one year of Commission approval of this plan (in lieu of “Residential Smart Charging” program withdrawn by PGE).
31. PGE agrees to propose a workplace charging and/or fleet charging program within one-year of the date of the Stipulation, conditioned on Commission approval of the Stipulation. The approximate total cost of the proposal will be \$1M. The program shall be open to both cost-of-service and direct access customers. The proposed \$1M results from a removal of \$1M from the PGE's proposed Education and Outreach budget in its application. PGE will also separately consider developing programs to increase access to electricity as a transportation fuel at multifamily dwellings.

The amended stipulation makes the following four basic modifications to the terms discussed in the above paragraphs 30 and 31 in the original stipulation: (1) making participants’ enrollment in time of use rates optional, not required, when they enroll in the residential pilot program; (2) removal of capital costs from the business pilot program proposal;⁴ (3) changes in how costs and revenues would be tracked and treated; and (4) conversion of pilot costs from net present value (“NPV”) to nominal cost.

IV. DISCUSSION

Through Senate Bill (SB) 1547, the 2016 Oregon Legislature adopted a statewide goal to increase the use of electricity in the transportation sector.⁵ In that bill, the legislature determined that transportation electrification was necessary “to reduce petroleum use, achieve optimum levels of energy efficiency and carbon reduction, meet federal and state air quality standards, meet this state’s greenhouse gas emissions reduction goals * * * and improve the public health and safety.”⁶

The legislature also envisioned that transportation electrification should assist in the integration of new, clean resources and creates the opportunity for net benefits for electricity customers.⁷

⁴ See *In the Matter of Portland General Electric Company, Advice No. 19-05 (ADV 929), Schedule 150, Transportation Electrification Cost Recovery Mechanism*, Docket UE 360, Order No. 19-321 (Sept 27, 2019) acknowledging withdrawal of Advice No. 19-05.

⁵ Or Law 2016, chapter 28; codified in statute under ORS 757.37.

⁶ SB 1547, § 20(2)(a).

⁷ SB 1547, § 20(2)(e) and (f).

To implement the provision of SB 1547 relating to transportation electrification, we developed rules through docket AR 599, adopted on November 23, 2016, in Order No. 16-447, and set forth in OAR chapter 860, division 087. In those rules, we required electric companies to file applications for programs to accelerate transportation electrification and set requirements for the form and content of those applications.

On April 16, 2019, in Order No. 19-134, in docket AR 609, we adopted a new rule for the development of transportation electrification plans, and emphasized the context for those plans as follows:

The legislature's vision for transportation electrification is expansive. We expect the planning efforts of the electric companies to take this vision into account. Programing should be developed that seeks to achieve these legislative goals.⁸

We appreciate the work of the parties to forge a compromise through this amended stipulation that allows the programs identified in the original stipulation to move forward in a manner that is consistent with all stipulating parties' understanding of the original agreement. We recognize that the integrity of the Commission's process and the credibility of participants in our process depends on adherence to stipulation commitments.

Though we approve the amended stipulation, we note that we have issued no order or guidance suggesting that PGE's future program proposals could not be larger in scale. Nor have we prevented PGE from proposing new or expanded programs in response to evolution in the transportation electrification market. In fact, we have encouraged consideration of the broad scope of the legislative goals and directives expressed in SB 1547, and we expect that the framework provided by PGE's transportation electrification plan will give us the opportunity to review and consider the costs and benefits of larger and more ambitious program proposals developed to help further the legislature's vision in a manner that satisfies SB 1547 and benefits ratepayers and the electricity system. Given the rapidly evolving electric vehicle market, timely leadership from electric utilities and the Commission is needed to achieve the legislature's vision for expanded transportation electrification that delivers robust system and customer benefits. We look forward to engaging with PGE, Staff, and stakeholders in this area.

⁸ Order No. 19-134 at 3.

V. ORDER

IT IS ORDERED that:

1. The Joint Motion to Adopt Amended Stipulation of the Parties is granted.
2. The Amended Stipulation attached to this Order as Appendix A, is adopted.
3. This docket is closed.

Made, entered, and effective Nov 07 2019.



Megan W. Decker
Chair



Stephen M. Bloom
Commissioner



Letha Tawney
Commissioner



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.

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In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Application for Transportation Electrification
Programs

AMENDED STIPULATION

This stipulation ("Stipulation") is between Portland General Electric Company ("PGE"), Staff of the Public Utility Commission of Oregon ("Staff"), the Citizens Utility Board of Oregon ("CUB"), the Alliance of Western Energy Consumers ("AWEC"), the Oregon Department of Energy ("ODOE"), Tesla, Inc. ("Tesla"), the Tri-County Metropolitan Transportation District of Oregon ("TriMet"), Forth, and Greenlots (collectively, "Stipulating Parties"). ChargePoint also participated in settlement discussions and has elected not to participate in this Stipulation.

PGE filed an Application for Transportation Electrification ("TE") Programs on December 27, 2016 and supplemented the Application and provided supporting testimony on March 15, 2017. In the following three months, Staff, CUB, ICNU, and ChargePoint sent 86 data requests regarding PGE's filing. On April 24, CUB, ICNU, Staff, Forth, ChargePoint, and Greenlots filed written reply testimony. Parties to this docket participated in a Settlement Conference on May 12, during which stakeholders discussed concerns and opportunities. During that discussion, PGE accepted a number of Stipulating Parties' proposals and offered modifications regarding other proposals. The Stipulating Parties also accepted a number of PGE's suggestions, which represented compromises that Stipulating Parties deemed reasonable for settlement purposes. Details of the settled issues are described in detail below.

TERMS OF STIPULATION

1. This Stipulation settles all issues in this docket. In its application, PGE proposed four TE programs; however, PGE has agreed to withdraw the "Residential Smart Charging" proposal, therefore, this Stipulation contains terms for PGE's three remaining TE programs: TriMet Mass Transit; Education and Outreach; and Electric Avenue Network; as well as two future programs to be proposed by PGE.

Terms Applicable to All Three of PGE's Programs¹

2. For the Stipulating Parties to support approval of PGE's three Transportation Electrification programs as modified in this Stipulation, PGE agrees that the proposals are pilot programs only, meaning that the Stipulating Parties have not agreed that the TE proposals meet the six statutory criteria outlined in SB 1547, but rather, these TE programs may provide value as pilot programs. As pilots, the programs must be time-limited, cost-limited, and be designed to produce specific learnings.
3. PGE is to hold workshops with Staff and intervenors to develop cost effectiveness and attribution methodologies for TE programs. PGE is encouraged to work with Pacific Power to coordinate or co-develop these models.
4. PGE will schedule meetings, with the Stipulating Parties to this docket, to identify the specific and detailed learnings for each of the three TE pilots included in this Stipulation. Once the Stipulating Parties agree on the specific learnings to be gained from these pilots, PGE will file a written list of said learnings in this docket and will track and report on such learnings. A draft of the type of learnings expected from these pilots is included in Appendix 1, but is subject to revision by the Stipulating Parties.
5. When PGE proposes cost recovery for the TE programs in this Stipulation, all costs

¹ The three programs include: TriMet Mass Transit; Education and Outreach; and Electric Avenue Network.

will be subject to a prudence review.

6. The Stipulating Parties agree that this Stipulation does not address the treatment of costs for any future programs, including the proposed residential charging pilot described in paragraph 31 and the proposed workplace charging pilot described in paragraph 32.
7. The Stipulating Parties agree that all revenues and O&M costs associated with these three pilots and the required pilot evaluation shall be deferred in a deferred account. PGE proposes to track all revenues and costs in a balancing account, and potentially net these values as they are received or incurred. PGE agrees that the calculation toward the total cost caps is based on all costs incurred to-date *prior to* any netting of revenues. Further, PGE agrees that the cost caps represent the maximum customer responsibility, meaning that if zero revenues are received, the most that can be recovered from customers for the three pilots and evaluation is \$6.872M (see Table 1). However, if any revenues are received—which is strongly anticipated—customers will be responsible for the amount of: \$6.872M minus total revenues received. The remaining balance in the balancing account (supported by a deferred account) may be refunded to or collected from customers subject to the terms of this Stipulation.
8. Amounts in this Stipulation are nominal costs. O&M costs include direct expenses such as regular charging site maintenance, emergency charger maintenance, land lease expenses, customer outreach expenses, and sales transaction costs that result from card payment and network fees, but do not include capital carrying costs or interest. Overnight capital costs are the total capital investment as if the asset was delivered on a single day.²
9. A summary of maximum allowable costs is included below. Maximum allowable costs represent total cost caps, meaning the most that may be recoverable from customers for the three pilots and pilot evaluation costs. Any excess costs shall be

² This definition of “overnight capital costs” applies everywhere that the term is used in this Stipulation.

borne by PGE and not by its customers.

Table 1: Maximum Allowable Costs by Program (\$000's)

	Maximum Allowable Costs		
	O&M	Overnight Capital Cost	Total
Outreach and Technical Assistance	480	-	480
TriMet Pilot	-	625	625
Electric Avenue Network*	2,787	2,400	5,187
Residential Home Charger Pilot	-	-	-
Pilot Evaluation	580	-	580
Total	3,847	3,025	6,872

* If federal tax credits are available, allowable decrease based on federal tax credits received.

10. Maximum allowable costs are composed of direct O&M costs and overnight capital costs from the pilot. Indirect costs such as interest on expenses and capital carrying costs (e.g. interest during the construction period, property taxes, income taxes, salvage, return requirements) related to the overnight capital costs, franchise fees, OPUC fees, and uncollectibles are not included in the maximum allowable costs.³

TriMet Pilot

11. Maximum allowable cost for the TriMet pilot, if determined to be prudent, is \$625,000.
12. Pilot is time limited: 10-year asset life for charging stations. Contract with TriMet is 10 years.
13. PGE to report annually on program progress, program costs and costs recovered, estimates of costs to be recovered, specific learnings, and any recommended changes to methodology.

³ The Stipulating Parties acknowledge that de minimis “indirect” costs like those described in paragraph 10 have not been included in the maximum allowable cost caps in Table 1 due to the difficulty in calculating them at this point in time. Such indirect costs may be recoverable in a future ratemaking proceeding, but are subject to review for reasonableness and final Commissioner determination. Further, the Stipulating Parties agree that PGE is not prohibited from spending in excess of the total cost caps, but all Stipulating Parties agree that all excess spending above the total cost caps for the three pilots and pilot evaluation cannot be recovered from PGE’s customers.

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14. PGE agrees to register as a credit generator under the Clean Fuels Program and to credit any value it receives from Clean Fuels Program credits associated with the TriMet charging stations to all customers and ratepayer classes to offset the cost of these pilots.
15. PGE agrees that the TriMet pilot program is not a model to allow utility ownership of transit charging infrastructure beyond this pilot's terms and scope.
16. PGE will file a copy of the executed PGE-TriMet agreement, after it is executed, in the UM 1811 docket.
17. In the vendor contracts for the TriMet program charging station equipment, PGE agrees to use best efforts to place the costs of equipment risk or failure on the vendor/manufacturer; if equipment costs or failure risks exceed the spending cap agreed to in this Stipulation, PGE agrees that PGE customers will not be responsible for the cost overruns.
18. PGE will not undertake any future action that commits ratepayer funding for mass transit electrification projects without first participating in a discussion with the Commission. Any future proposals to use ratepayer money for mass transit electrification will be discussed with Staff and Stipulating Parties in advance of any commitments and will be filed with the Commission for review.
19. Approving this TriMet pilot program is not intended to suggest that future investment by PGE in mass transit electrification is appropriate.
20. PGE will identify in writing the specific learnings to be gained from this pilot and provide annual reporting on the pilot-as described in paragraph 4 above.

Education and Outreach

21. Maximum allowable cost for Education and Outreach is \$480,000 over an initial three-year pilot period. These are O&M costs. Additional spending will be subject to application of the forthcoming cost effectiveness analysis and attribution methodology.

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- 22. \$1M has been removed from the Education and Outreach proposal to be allocated for a future workplace and/or fleet charging program noted at paragraph 32.
- 23. The 1.0 FTE dedicated to Education and Outreach will be pulled from PGE's TE proposal and Stipulating Parties agree to support the addition of 1.0 FTE (at no more than \$183,000) for TE technical assistance in PGE's pending general rate case, UE 319.
- 24. \$480,000 will be allocated over 3 years to the remaining education and outreach initiatives, as displayed in Table 2.

Table 2: Outreach & Education Budget*, Nominal (\$000's) -

	Maximum Allowable Costs
Technical Assistance	90
Builders & Facilities Outreach	150
Ride & Drives	90
Regional Market Transformation	150
Total	480

* Amounts may vary between the four categories, but the total of \$480 will be the same.

Electric Avenue Charging Stations

- 25. PGE is limited to investing in a maximum of six additional Electric Avenue Charging sites under this settlement.
- 26. Maximum allowable costs for additional Electric Avenue charging stations will be capped at \$2.8M, assuming no tax credits are available for this equipment. If tax credits are available for additional Electric Avenue deployments, costs will be capped at \$2.8M less the value of tax credits PGE received. Overnight capital costs for additional Electric Avenue charging stations will be capped at \$2.4M.
- 27. PGE will collect and report information and data on a yearly basis that includes, but is not limited to, load profiles, utilization, charging frequency, charging duration, voltage and power quality, kWh delivery, insights into price sensitivity

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of customers charging at the Electric Avenue chargers, revenue generated, types of vehicles customers drive, and any additional insights.

28. Time limited: this Pilot is limited to the 10-year asset life for charging stations.
29. PGE agrees to register as a credit generator under the Clean Fuels Program and credit any value it receives from Clean Fuels Program credits associated with the Electric Avenue charging stations to all customers and all ratepayer classes to offset the cost of these pilots.
30. As part of the reporting requirements, PGE is to review its tariff charges for public charging at least annually to determine if charges or other terms need to be changed; Stipulating Parties may participate in this review.

Agreement to Future Pilot Proposals

31. PGE agrees to propose a residential charging pilot, which includes rebates for customer installation of a connected level 2 home charger within one year of Commission approval of this plan.⁴ In exchange for accepting a rebate from PGE, the customer will be automatically enrolled in an EV-charging demand response pilot program. Customers participating in the residential charging pilot may also choose to go onto a time-of-use rate schedule and will be given the opportunity to do so at the time of application for the rebate. The EV charging rebate application process will connect to the time-of-use enrollment process with applicable information when selected by the customer.
32. PGE agrees to propose a workplace charging and/or fleet charging program within one-year of the date of the Stipulation, conditioned on Commission approval of the Stipulation. The approximate total cost of the proposal to be charged to customers will be \$1M (only nominal O&M costs will be charged to customers in this proposal). The program shall be open to both cost-of-service and direct access

⁴ This future program will be proposed in lieu of the "Residential Smart Charging" program that PGE has agreed to withdraw at this time.

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customers. The proposed \$1M results from a removal of \$1M from the PGE's proposed Education and Outreach budget in its application. PGE will also separately consider developing programs to increase access to electricity as a transportation fuel at multifamily dwellings.

33. Pilot Evaluation: Costs for program evaluation are capped at \$580,000.
34. The Stipulating Parties recommend and request that the Commission approve this Stipulation as an appropriate and reasonable resolution of the issues in this docket.
35. The Stipulating Parties agree that this Stipulation represents a compromise in the positions of the Stipulating Parties. Without the written consent of all Stipulating Parties, evidence of conduct or statements, including but not limited to term sheets or other documents created solely for use in settlement conferences in this docket, and conduct or statements made at settlement conferences, are confidential and not admissible in the instant or any subsequent proceeding, unless independently discoverable or offered for other purposes allowed under ORS 40.190.
36. The Stipulating Parties have negotiated this Stipulation as an integrated document. If the Commission rejects all or any material part of this Stipulation, or adds any material condition to any final order that is not consistent with this Stipulation, each Stipulating Party reserves its right: (i) to withdraw from the Stipulation, upon written notice to the Commission and the other Stipulating Parties within five (5) business days of service of the final order that rejects this Stipulation, in whole or material part, or adds such material condition; (ii) pursuant to OAR 860-001-0350(9), to present evidence and argument on the record in support of the Stipulation, including the right to cross-examine witnesses, introduce evidence as deemed appropriate to respond fully to issues presented, and raise issues that are incorporated in the settlements embodied in this Stipulation; and (iii) pursuant to ORS 756.561 and OAR 860-001-0720, to seek rehearing or reconsideration, or pursuant to ORS 756.610 to appeal the Commission order. Nothing in this

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paragraph provides any Stipulating Party the right to withdraw from this Stipulation as a result of the Commission's resolution of issues that this Stipulation does not resolve.

37. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Stipulation throughout this proceeding and in any appeal, provide witnesses to support this Stipulation (if specifically required by the Commission), and recommend that the Commission issue an order adopting the settlements contained herein. By entering into this Stipulation, no Stipulating Party shall be deemed to have approved, admitted or consented to the facts, principles, methods or theories employed by any other Stipulating Party in arriving at the terms of this Stipulation. Except as provided in this Stipulation, no Stipulating Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving issues in any other proceeding.

38. This Stipulation may be signed in any number of counterparts, each of which will be an original for all purposes, but all of which taken together will constitute one and the same agreement.

ORIGINALLY DATED the 27th day of June, 2017; AMENDED this 11th day of September, 2019.



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STAFF OF THE PUBLIC UTILITY
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