ORDER NO. 25-393

ENTERED Oct 02 2025

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2056

In the Matter of PACIFICORP, dba PACIFIC POWER, Oregon Transportation Electrification Plan.	ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

This order memorializes our decision, made and effective at our September 30, 2025 Regular Public Meeting, to adopt Staff's recommendation in this matter with the additional directive to the company to work with Staff to account for federal funding changes to incentives available to moderate income households in its Schedule 117 filing. The Staff Report with the recommendation is attached as Appendix A.

Made, entered, and effective Oct 02 2025.

Letha Tawney
Chair

COMMISSIONER PERKINS UNAVAILABLE FOR SIGNATURE

Les Perkins
Commissioner

Karin Power
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 Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. RA1

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 30, 2025

REGULAR __X__ **CONSENT** ____ **EFFECTIVE DATE** ____N/A____

DATE: September 22, 2025

TO: Public Utility Commission

FROM: Eric Shierman

THROUGH: Caroline Moore and Sarah Hall **SIGNED**

SUBJECT: PACIFIC POWER:
(Docket No. UM 2056)
Acceptance of 2026-2028 Transportation Electrification Plan.

STAFF RECOMMENDATION:

Accept Pacific Power's 2026–2028 Transportation Electrification Plan.

DISCUSSION:

Issue

Whether the Public Utility Commission (Commission) should accept Pacific Power's (PacifiCorp or the Company) Transportation Electrification (TE) Plan (the Plan). Acceptance of the Plan will approve the Company's TE Budget for 2026-2028.

Applicable Rule or Law

Division 87 of the Commission's administrative rules provides the requirements for an electric company TE Plan.[1] The objective of the Division 87 rules is to integrate the electric company's TE actions into one document and to act as a summary of the electric company's investments and activities.[2] A TE Plan must include:[3]

a) A description of current market conditions.

[1] OAR 860-087-0020.
[2] OAR 860-087-0020(1).
[3] OAR 860-087-0020(3)-(4).

b) A summary of programs and future concepts.
c) A discussion of how the TE Plan advances certain performance area categories.
d) Supporting data and analysis.
e) A discussion of potential impact on competitive EV supply equipment market.
f) Ratepayer impact.
g) A TE Budget.
h) Any new Program and Infrastructure Measure applications.

Commission acceptance of the TE Plan grants approval of the TE Budget.[4]

Analysis

Background
On May 1, 2025, Pacific Power filed a draft 2026- 2028 TE Plan. Staff hosted a workshop on June 9, 2025, in which the Company presented the Plan to stakeholders and answered questions. Staff, the Alliance for Transportation Electrification (ATE), the Northwest Energy Coalition (NWEC), the Green Energy Institute (GEI), the Oregon Environmental Council (OEC), and Climate Solutions filed Comments on this Plan. GEI, NWEC, OEC, and Climate Solutions filed jointly as Advocates. Pacific Power filed its first TE Plan in February, 2020, and second in June, 2023.

In its current Plan, Pacific Power proposes a three-year budget of $31.3 million, which is a decrease of $65 thousand from the prior 2023-2025 Plan. The Company plans to maximize the use of Monthly Meter Charge (MMC) and Clean Fuels Program (CFP) revenue and operate within that budget constraint. The key strategic decision in this Plan is whether to redirect approximately $2 million in funds from the standard residential rebate to instead increase incentives for low income, commercial customers, and those who utilize public charging infrastructure

As context, Pacific Power operates five TE measures:

- **Public Infrastructure Pilot –** This measure has built five public charging stations across the Company's service territory offering both L2 and direct current fast chargers (DCFC).
- **Grants –** Funded by residential CFP credits, Pacific Power's grants are tailored to underserved communities or organizations that serve underserved communities.
- **Residential Program –** This measure provides rebates for the installation of home chargers.

[4] OR Laws 2021, ch 95, § 2(3); OAR 860-087-0020(2)(a).

- **Commercial Program –** This measure provides rebates for the installation of both private and public charging infrastructure by nonresidential customers.
- **Managed Charging –** This is a demand-side measure signing residential customers up for voluntary curtailment of charging to meet the Company's system needs.

In this Plan, Pacific Power no longer categorizes Outreach and Education as a standalone program. The Company continues to promote TE within its service territory are represents these activities within the other five measures.

TE Budget
Pacific Power's three-year TE budget of $31.3 is similar to the previous budget, as shown in Table 1 below, and equals the minimum statutory spending of 0.25 percent of retail sales and Commission-ordered expenditures of residential CFP credits.

Table 1: Comparison of Proposed 2026-28 TE Budget with Previous 2023-2025 in $ Thousands

Program/Measure	2023-25 Budget	2026-28 Budget	Percent Change
Commercial Program	6,803	7,592	12
Residential Program	2,626	1,003	-38
Grants	11,588	11,900	3
Managed Charging	1,961	852	-57
Portfolio Support	2,277	1,427	-37
Public Infrastructure Pilot	2,500	8,528	241
Outreach and Education	3,633	0	-100
Total	**31,367**	**31,302**	**0**

Though the overall budget remains stable, Pacific Power has reprioritized its budget toward low income, fleet, and public charging. Pacific Power's new budget eliminates its standard residential charger rebate and repurposes half of its prior standard residential rebate budget to income-qualified residential charger rebates. The remainder expands incentives for fleets and builds company-owned public charging. This prioritization is an issue of controversy in this proceeding.

Advocates back the Company's efforts to increase support for income-qualified residential rebates but oppose elimination of standard residential rebates for customers that do not income qualify. Advocates question Pacific Power's assessment that standard rebates are not influencing customer behavior and note that this decision overlooks the barriers facing moderate-income customers. In contrast, ATE supports Pacific Power's focus on low-income customers and the Company's program evaluation that found standard rebate customers were only 38 percent likely to be influenced by the program. ATE would support a standard residential rebate if it were paired with mandatory participation in managed charging.

In response, Pacific Power points to the cost of a home charger relative to the price of an EV, showing the rebate is less than one percent of the average vehicle's purchase price.[5] The Company argues this is too small to move standard customers to make the switch to EVs. The Company also points to the market research of Esource, which finds that the primary impediment to EV purchases is the perception of inadequate charging infrastructure. Pacific Power doesn't see the price of EVs as the primary barrier to EV adoption.

Staff finds Pacific Power's response persuasive. Staff also finds that the Company's TE Plan offers the most persuasive evidence for reallocating funds to low income, public chargers, and commercial customers based on the Company's program evaluation research of its residential rebates. That evaluation showed direct evidence of significant free ridership. Staff appreciates Advocates engaging on this issue and highlighting the trade-offs in the Company's proposed priorities. Staff welcomes consideration of spending elective ratepayer funds beyond the MMC and CFP funds and hopes the managed charging pilot can develop into an attractive offering for standard residential customers.

Benefit/Cost Analysis
Staff reviewed Pacific Power's benefit/cost analysis (BCA). While Staff found grounds to make adjustments that lowered the benefit/cost ratio, Staff's analysis confirmed Pacific Power's Plan is robustly cost-effective from both the Total Resource Cost Test perspective and the Societal Cost Test Perspective. Because the Company is operating on MMC and CFP funds, per Order No. 25-028 cost-effectiveness is not required. With the estimated benefits of this Plan exceeding its costs, the Company is keeping TE Budget operating costs contained.

Rule 13 (Transportation Line Extension Allowance)
The Plan shows proposed tariff changes for Rule 13, the Company's transportation line extension allowance proposed in this Plan in Appendix I. The Plan's intent is to provide a more generous allowance to make-ready customers. Commission acceptance of the Plan does not constitute approval of these new tariffs. PacifiCorp will need to file applications for Commission approval to modify these tariffs.

5 Company Reply Comments at 5.

The Company's inclusion of the proposed tariff language provides helpful context for the specific program design the Plan describes. Pacific Power's proposed changes to Rule 13 allowed Staff to review the budgetary implications before the Company filed the proposed change. Staff observes that the scope of the change to Pacific Power's Transportation Line Extension Allowance is broader that the Company has budgeted for.[6] Staff met with Pacific Power on this, and the Company agreed to ultimately file a proposed change that narrows the scope of eligibility to make-ready participants.

Charging Data

Staff monitors the utilization of capacity at public chargers in each electric company's service territory. Staff observes the average capacity factor at public chargers in Pacific Power's service territory remains similar to what the Company found analyzing 2022 data. While the fact that this capacity utilization hasn't grown when the quantity of EVs has may seem counterintuitive, there are two explanations. First, more public chargers have been built since 2022, and the nameplate capacity of new sites has grown as well. However, many EVs can still only charge at 50 kW, regardless of whether they plug into a 350 kW port in a Walmart parking lot. These countering trends can suppress capacity factors.

In the Plan, Pacific Power presents a different metric that might better capture the availability of chargers to EV operators: Daily Port Utilization (DPU). DPU shows the percentage of time each port is in use rather than as a percentage of nameplate capacity.

Performance Areas

In reviewing the Company's Plan in response to Division 87 reporting on performance areas, Staff observes several points. Under OAR 860-087-0020(2)(c)(A) the TE Plan reports on environmental benefits. The Company's 2025 TE Plan Report shows a reduction in 2.5 micrometer particulate matter ($PM_{2.5}$) of one ton.[7] In discussions with the Company, Staff learned this analysis is not a net assessment. Staff is working with Pacific Power to incorporate reporting on the emissions impact that nets out the $PM_{2.5}$ intensity of PacifiCorp's resource mix and several other pollutants, from the reduced emissions from motor vehicle tailpipes.

Both the Plan and its corresponding TE Plan Report offer important discussion on the impact of TE on Pacific Power's grid. Staff issues an annual information request (IR), asking for instances where a charging related distribution system upgrade took more than a year to complete. In the past Staff has received confirmation from each utility of

6 Reply Comments at 2, (July 25, 2025).
7 Pacific Power Oregon TE 2024 Annual Plan Report, Table 6 at 17 (May 1, 2025).

no such instances. However, in this proceeding Pacific Power replied that in 2024 the Company had 126 EV-related infrastructure projects and 21 took longer than a year to complete.[8] Staff will further monitor this development.

Pacific Power deserves credit for maintaining active stakeholder outreach and inclusion. Since the prior TE Plan, Staff has attended several meetings Pacific Power has held with stakeholders, updating programmatic details. The Plan documents the work the Company's regional business managers provide connecting Pacific Power's TE efforts to local community events.[9]

Aside from the Advocates' opposition to the Plan's discontinuation of the standard residential rebate, they are generally supportive of the Plan and offer feedback in support of income-qualified rates at Company-owned public chargers and ways to improve its impact. Advocates are supportive of Pacific Power's managed charging but ask for more details on execution and would like to see greater investment in this measure.[10] ATE is also generally supportive of the Plan. ATE sees the Plan as proposing a streamlined and customer-focused portfolio.

Staff Recommendation
Staff recommends acceptance of the Plan because Pacific Power has met the requirements of OAR 860-087-020. Staff finds the proposed TE Budget and Plan reporting reasonable.

Conclusion

Staff is mindful of the significant work that goes into formulating a TE Plan in Oregon's jurisdiction. Staff is also thankful to stakeholders for their valuable dialogue and written comments. Staff recommends the Commission accept Pacific Power's TE Plan. The Plan meets the requirements of OAR 860-087-020. Staff finds the proposed TE Budget reasonable, because the Company is redirecting funds that program evaluation shows to have less impact toward other measures with more promising opportunities to influence the market and benefit customers.

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8 Company response to PUC IR 47.
9 Draft 2026-2028 TE Plan at 94.
10 Advocates Comments at 5.

PROPOSED COMMISSION MOTION:

Accept Pacific Power's 2026–2028 Transportation Electrification Plan.

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