

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UE 435

In the Matter of)	
)	CHARGEPOINT, INC.’S
PORTLAND GENERAL ELECTRIC)	RESPONSE TO OREGON
COMPANY)	CITIZENS’ UTILITY BOARD’S
)	MOTION TO DISMISS OR
Request for a General Rate Revision)	SEGREGATE CERTAIN ISSUES

I. INTRODUCTION

On February 29, 2024, Portland General Electric Company (“PGE”) filed a Request for a General Rate Revision (“general rate case”) in Docket No. UE 435 (the “proceeding”). On March 14, 2024, Oregon Citizens’ Utility Board (“CUB”) submitted a motion for the Public Utility Commission of Oregon (“the Commission”) to dismiss the general rate case, or alternatively, to segregate certain issues from the general rate case and address them in a public meeting (the “Motion”). On March 18, 2024, Administrative Law Judge Katherine Mapes invited parties to this proceeding to submit responses to the Motion by March 29, 2024.

ChargePoint, Inc. (“ChargePoint”) filed a request for party status with the Commission on March 25, 2024, and submits this response to CUB’s Motion. ChargePoint respectfully requests the Commission consider PGE’s Schedule 50 tariff revision in this proceeding, either by rejecting CUB’s Motion or adopting the alternative to segregate the issues of contention.

II. ARGUMENT

ChargePoint takes no position on CUB’s arguments on the issues of contention identified in the Motion. However, we are concerned that CUB’s request for the dismissal of the general

rate case altogether would throw the baby out with the bathwater by eliminating the Commission's opportunity to review PGE's proposed update to Schedule 50.

Schedule 50 is the tariff that sets the pricing charged to drivers using PGE-owned-and-operated electric vehicle (EV) charging stations, currently a flat fee of \$3 per session for Level 2 charging and \$5 per session for DC fast charging (DCFC). In the general rate case, PGE proposes a shift from the flat pricing structure to per-kilowatt hour pricing.¹ PGE committed to an updated Schedule 50 in its 2023 Transportation Electrification Plan that was approved by the Commission in Docket No. UM 2033 with the goal of prioritizing simplicity, efficient use of the grid, and equity.² It would be beneficial for both EV drivers in PGE's service territory and the charging industry in Oregon for the Commission to review and approve PGE's proposed changes to Schedule 50 as expeditiously as possible – that is, in this proceeding.

The problem with Schedule 50 in its current form is that it charges drivers a flat per-session fee, regardless of how much energy is dispensed or the cost to deliver that electricity. That means a driver who consumes ten kilowatt-hours at a PGE-owned station would pay the same as a driver who consumes sixty kilowatt-hours at the same station. A shift to per-kilowatt hour pricing in Schedule 50, as proposed in the general rate case, is increasingly recognized as best practice to ensure transparent pricing and fair customer experience at EV charging stations. Per-kilowatt-hour pricing is not only more consistent with principles of cost causation and fairness, as drivers pay for what they consume, but it is easier to understand because per-kilowatt-hour pricing is comparable to the volumetric (i.e., per-gallon) rate that drivers are accustomed to paying for gasoline.

¹ UE 435, Direct Testimony and Exhibits of Maria Pope and Brett Sims, filed February 29, 2024, at 423.

² UM 2033 (“TEP Proceeding”), Final 2023 Transportation Electrification Plan, filed on August 25, 2023, at 101-102.

Further, an update to Schedule 50 is needed to preserve a level playing field in the competitive market for EV charging services. In the Transportation Electrification Plan (“TEP”) Proceeding, twenty-one industry stakeholders, including ChargePoint, jointly submitted comments to urge PGE to modify Schedule 50 to align with market pricing for EV charging services to avoid undercutting the competitive market.³ Stakeholders argued that the existing Schedule 50 tariff creates an unlevel playing field between utility-operated stations and privately operated stations because the flat-fee structure does not necessarily reflect the full cost of offering EV charging services and may be increasing rate pressure on utility customers. ChargePoint appreciates PGE’s responsiveness to stakeholders’ concerns in the TEP Proceeding by following through with the filing of a revised Schedule 50 tariff based on market pricing in its general rate case.

Granting CUB’s motion to dismiss the general rate case would delay the Commission’s review of Schedule 50 and create uncertainty on the timing for an update to the tariff. For this reason, ChargePoint urges the Commission to reject CUB’s motion to dismiss and proceed with review and consideration of Schedule 50 in this proceeding. ChargePoint does not object to the CUB’s alternative proposal for the Commission to segregate certain contentious issues, so long as consideration of Schedule 50 remains in this proceeding. Alternatively, should the Commission grant CUB’s motion to dismiss, we request that the Commission avoid unnecessary delay on this issue by directing PGE to file its Schedule 50 proposal as a standalone tariff revision.

³ UM 2033, EV Charging Coalition Comments, filed July 13, 2023.

III. CONCLUSION

Notwithstanding the issues presented by CUB, ChargePoint respectfully requests that the Commission proceed with consideration of PGE's proposed update to Schedule 50 in the general rate case, either by rejecting CUB's Motion or by accepting CUB's alternative proposal to segregate the issues of contention. Should the Commission grant CUB's motion to dismiss, the Commission should direct PGE to submit its Schedule 50 proposal as a standalone tariff revision.

ChargePoint appreciates the Commission's consideration of our comments, which we believe align with the best interest of EV drivers refueling in PGE territory, PGE ratepayers, and the charging industry in Oregon.

Respectfully submitted on March 29, 2024,

BY: /s/ Mal Skowron

Mal Skowron
Regulatory Coordinator
ChargePoint, Inc.
254 East Hacienda Ave.
Campbell, CA 95008
908-307-1972
mal.skowron@chargepoint.com