



Portland General Electric

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September 1, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
PO Box 1088
Salem, OR 97308-1088

Re: Docket No. UM 2033, PGE reply to comments filed by FLO EV Charging

Filing Center:

Portland General Electric (PGE or the Company) wishes to acknowledge and reply to comments filed in Docket No. UM 2033 by FLO EV Charging, regarding PGE's proposed 2022 Monthly Meter Charge Budget. FLO's August 16, 2022 comments offer support and technical recommendations to PGE's proposed budget and recommend Public Utility Commission of Oregon (OPUC or Commission) approval with modifications.

Specific modifications FLO recommends include:

Require PGE to document the process to permit chargers in cities' right-of-way to identify best practices

PGE appreciates this recommendation. We will integrate this into our evaluation of pilot implementation learnings, including successes and challenges, and will document best practices.

Specify a formula for PGE to measure compliance with its proposed 98 percent uptime target and apply all reliability requirements to publicly available chargers funded via the proposed budget

PGE agrees a consistently applied formula to understand charger uptime is needed – not just for publicly available chargers funded via the Monthly Meter Charge budget but across PGE's transportation electrification portfolio. With that in mind we recommend adoption of such a formula take place within the TE Planning process and in coordination with TE Plan Report metrics.

Ideally, such a formula for publicly-available chargers should be applied consistently across the industry and the country. PGE understands conversations about such a formula are currently unfolding in other venues, including reply comments to the Federal Highway Administration's proposed National Electric Vehicle Infrastructure (NEVI) guidance. PGE therefore recommends utilities and the State of Oregon follow these discussions closely and consider adopting an externally-developed and universally-applicable formula for calculating public charger uptime, rather than attempting to create an Oregon-specific, utility-specific, or program-specific approach.

Conclusion

PGE thanks FLO for their constructive and supportive comments and appreciates their careful review of the Company's proposed Monthly Meter Charge budget as well as our associated Municipal Charging Collaboration Pilot program application. We look forward to further discussion of these topics as the TE Planning process continues to unfold.

Thank you,

/s/ Jason Salmi Klotz

Jason Salmi Klotz
Manager, Regulatory Strategy and Engagement

Cc: Michael O'Brien, PGE