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Public Utility Commission
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RE: UM 2033 – ZEVIWG Comments on PGE's 2026-2028 Draft Transportation Electrification Plan

The Oregon Departments of Energy, Environmental Quality, and Transportation — members of the Zero Emission Vehicle Interagency Working Group — are grateful for the opportunity to provide these comments on Portland General Electric Company's 2026-2028 Transportation Electrification Plan. ZEVIWG's comments will address the following:

I. Planning for Transportation Electrification
II. Customer Programs and Incentives
    a. Fleet Partner Program
    b. Medium- and Heavy-Duty Charging Infrastructure
    c. Strategic Grid Investments program
    d. Clean Fuels Program Investments
III. Managing Grid Impacts and System Benefits
    a. Smart Charging and Load Management
    b. Infrastructure Deployment Strategy
    c. Rates
IV. Other Comments
    a. Energization Timelines
    b. CFI Correction

I. Planning for Transportation Electrification

Utility TE planning is critical to ensure the grid can reliably meet the growing demand from electric vehicles. We commend PGE for its robust TE planning efforts, including anticipating charging needs, prioritizing investments where they are needed most, and designing infrastructure programs that align with state climate goals and zero-emission vehicle adoption targets.

We also appreciate PGE's role in developing the Electric Power Research Institute's GridFAST tool and support its use to inform grid planning and site-specific forecasting of EV load and EV

charging infrastructure deployment. GridFAST will enable more efficient and effective collaboration between EV customers and utilities to streamline project planning and accelerate timelines.

To further strengthen planning capabilities and transparency, we recommend that PGE publish and maintain feeder-level hosting capacity maps that show available capacity for EV charging infrastructure. Regularly updated, publicly available data on distribution system capacity would enable better planning, reduce project delays, and guide more strategic investments in charging infrastructure. Transparent maps would also ease the administrative burden on PGE by cutting down on repetitive developer inquiries about where new charging sites will be most cost-effective and faster to connect. This will enable faster charging deployment, accelerating ZEV adoption in PGE territory and helping to meet the state charging infrastructure needs identified in ODOT's Transportation Electrification Infrastructure Needs Analysis (TEINA).

II. Customer Programs and Incentives

a. Fleet Partner Program

The Fleet Partner Program represents one of PGE's most effective tools for accelerating electrification in commercial and public fleets. By providing technical assistance, infrastructure incentives, and access to utility-side expertise, the program has laid essential groundwork for electrification in the delivery, logistics, and public sectors. We appreciate PGE's recognition of its importance and support the continuation of this program through 2028.

We also support PGE's efforts to simplify eligibility, streamline processes, and continue its focus on technical assistance with updates to the fleet total cost-of-ownership tool. However, we are concerned by the proposed budget reduction from $18 million in 2023-2025 to $5 million in 2026-2028. PGE cites higher EV costs, supply chain disruptions, regulatory uncertainty, limited public charging, and unclear total cost of ownership as reasons for slowed customer participation. While these barriers are real, reducing program investment at this stage risks amplifying them rather than solving them.

Key considerations include:

- Regulatory Uncertainty: Diminished federal support for ZEVs makes it *more important,* not less, for states, utilities, and local governments to maintain commitments and provide stable signals to fleets. Scaling back now widens the policy gap and risks leaving fleets without clear guidance. Fleet charging infrastructure development requires years of planning and buildout; delaying will create costly bottlenecks later when fleets inevitably need to transition.
- Public Charging Infrastructure: Several state-administered programs will significantly expand Oregon's charging network over the next three years, including ODOT's National Electric Vehicle Infrastructure Program, Community Charging Rebates program, Electric Vehicle Charging Reliability and Accessibility Accelerator, and Tri-State West Coast Charging and Fueling Corridor Project, as well as DEQ's Oregon Zero Emission Fueling Infrastructure Grant program. These investments will complement programs like PGE's Fleet Partner, which provides dedicated support to fleets.

- Vehicle Costs and Total Cost of Ownership: Even without strong federal incentives, many medium- and heavy-duty fleet applications already show favorable economics due to lower fuel and maintenance costs. Pausing support now risks locking fleets into new diesel purchases that will remain on the road for decades.
- Health and Equity Impacts – Diesel trucks continue to be a leading source of NOx and particulate emissions, disproportionately affecting environmental justice and underserved communities. Weakening commitment to electrification prolongs these harms.

While we recognize that PGE saw slower customer uptake in 2025, this argues for program adjustments, not budget cuts. We encourage PGE to consider pre-approved incentive pathways, expanded eligibility, and proactive and targeted engagement with fleet operators to rebuild momentum. Oregon adopted the Advanced Clean Trucks Rule to reduce tailpipe and greenhouse gas emissions through zero emissions vehicle technology. The rule requires manufacturers of medium- and heavy-duty vehicles (Class 2b – 8) to sell zero-emission trucks as an increasing percentage of their overall sales from vehicle model year 2025 through 2035. While DEQ recently issued enforcement discretion for manufacturers unable to meet ZEV requirements for model years 2025 and 2026, these regulations still provide a strong incentive for manufacturers, fleets, and utilities to invest in expanding Oregon's charging infrastructure.

b. Medium- and Heavy-Duty Charging Infrastructure

PGE continues to lead the region in piloting effective solutions for medium- and heavy-duty vehicle electrification. The Electric Island project remains one of the nation's most visible examples of utility-OEM collaboration, demonstrating PGE's willingness to invest in megawatt-scale charging. We also commend the Fleet Partner Pilot and PGE's technical assistance and incentive offerings that have helped fleets navigate complex planning decisions. These efforts reflect a deep commitment to innovation and emissions reduction in the freight and transit sectors.

To build on this momentum, we encourage PGE to consider developing dedicated processes for depot planning that streamline the steps required and expectations for fleet managers as they navigate their site assessments and utility interconnection requirements. Similarly, providing more transparency and detail regarding PGE's demand charge process and rate options can help fleet managers understand upfront and future costs early in the process, allowing them to design charging infrastructure projects that match fleet needs with appropriate rate structures. To the extent possible, we recommend PGE prioritize grid upgrades for medium and heavy-duty fleet customers to ensure that these high-use and high-emissions vehicles can electrify quickly, with the necessary make-ready infrastructure on the utility side of their projects. These additions could help reduce project costs, streamline timelines, and enable more fleets to deploy zero emission vehicles with confidence.

c. Strategic Grid Investments program

PGE's focus on grid impacts in its new programs, including the Commercial Managed Charging Demonstrations program and the Strategic Grid Investments program, demonstrate its commitment to preparing for future scaling of EV adoption. PGE's integration of the Strategic Grid Investments program into its planning framework is a forward-looking step that aligns well

with Oregon's long-term climate goals, and the importance of transportation electrification in reaching those goals. By forecasting EV-related load and proactively evaluating and investing in capacity, PGE demonstrates its recognition that preemptive grid planning is essential to reduce interconnection timelines and minimize costs of required distribution system upgrades. We appreciate PGE's system-wide approach and data-driven tools that anticipate growth in residential, workplace, and fleet charging.

To strengthen these efforts, we recommend PGE consider utilizing location-specific forecasting and investment prioritization, especially for areas of projected MHD fleet depot demand. Planning grid investments with land-use data, zoning overlays, and large fleet locations could support anticipated charging infrastructure developments in PGE's service territory.

d. Clean Fuels Program Investments

PGE has been effective in deploying Clean Fuels Program revenue to support zero-emission transportation. Its long-standing investment in school bus electrification and the Drive Change Fund exemplifies how utilities can use credit proceeds to improve air quality, advance equity, and deploy climate solutions where they are most needed. PGE's stewardship of these funds, which come from the credits that are generated by its residential customers charging their EVs at home, continues to be a strong example for other utilities.

To expand these benefits further, we recommend that PGE extend the Flexible Buses and Emerging Technology fund to support a wider range of medium- and heavy-duty vehicles, including regional freight and delivery vans, urban service trucks, refuse vehicles, and public maintenance fleets. Expanding eligibility will help address current program hurdles – for example, bidirectional charging often requires a fast charger, while most school bus applications only need Level 2 charging. Broader support will ensure incentives encourage appropriately sized charging infrastructure, target sectors that drive the most miles, and better align with where Oregon is seeing the most MHD EV registrations. In addition, electrifying these sectors can yield significant greenhouse gas reductions and health benefits, especially in frontline communities that experience the greatest exposure to diesel exhaust. When selecting projects with a vehicle-to-grid component funded by Clean Fuels Program revenue, PGE should ensure that their primary focus remains advancing transportation electrification and that these projects are structured so that vehicle-to-grid capabilities complement, rather than overshadow, the central goal of electrifying vehicles that drive frequently and deliver the greatest emissions reductions.

III. Managing Grid Impacts and System Benefits

a. Smart Charging

We commend PGE's recognition of smart charging, demand response, and time-varying rates as important tools for managing growing EV load with grid capacity and clean energy supply and are happy to see Commercial Managed Charging Demonstrations and Residential Smart Charging pilots to test new technology and grid management solutions. The Oregon Department of Energy's draft Oregon Energy Strategy found that operating electric vehicles as flexible loads can help manage the costs and complexity of a growing electricity grid. Specifically, the strategy's Reference Scenario modeling indicates that transportation can

provide more than 1 gigawatt of flexible load to the grid by 2050, reducing costs by close to $4 billion over 25 years.

To ensure strong enrollment and clearly demonstrate the value of these programs, we recommend PGE set seasonal bill credits, or other financial benefits, at levels that meaningfully reflect the benefits of participation.

b. Infrastructure Deployment Strategy

We are pleased to see that PGE will continue the Site Feasibility Reviews as part of its infrastructure deployment strategy. Early insight into site viability is critical for both EV charging developers and state agencies supporting EV charging projects.

To strengthen this process, we recommend that PGE outline the process and timeline for these reviews on its website and have the option for prospective charging station developers to submit a request for Site Feasibility Review through the PGE website.

c. Rates

PGE has taken meaningful steps to simplify pricing structures for EV charging customers, including the introduction of Schedule 38 for commercial customers and updated time-of-use offerings for residential customers. We also commend the inclusion of interconnection support and customer education in the Business EV Charging Rebates program, which helps reduce financial and logistical barriers Oregonians face when deploying charging infrastructure.

To further assist customers and developers, we encourage PGE to provide a simplified, user-friendly breakdown of available rate options, make-ready cost estimates, and a publicly available cost calculator. These tools could enhance transparency, reduce confusion, and help accurately forecast operating expenses and return on investment, which is especially important for small businesses and local governments.

IV. Other Comments

a. Energization Timelines

We commend PGE for its leadership in advancing transportation electrification and for recognizing the importance of timely and reliable charging infrastructure. As this transition accelerates, the timely energization of EV charging sites will be increasingly critical to keeping costs down and ensuring the state can electrify at the pace required to meet climate goals. Long or uncertain wait times can discourage investment in charging infrastructure and create barriers for fleets and businesses planning EV adoption. To address this, we recommend PGE monitor and report energization timelines, helping to quickly identify bottlenecks, improve transparency, demonstrate accountability, and create opportunities to streamline processes and coordinate more effectively with developers and state and local governments.

b. CFI Correction

There is a minor correction required for “Chapter 2 Policy and Market Context.” ODOT’s allocation of the Tri-State West Coast Charging and Fueling Corridor Project is $21 million (currently reflected as $20 million).

Thank you for your consideration.

Sincerely,

Alan Zelenka, Assistant Director for Planning & Innovation
Oregon Department of Energy