Alliance for Transportation Electrification

September 17, 2025

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: UM 2033—PGE's 2026-2028 Transportation Electrification Plan

Enclosed for filing in the above-referenced matter please find the comments of the Alliance for Transportation Electrification.

Respectfully,

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COMMENTS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION

Introduction

The Alliance for Transportation Electrification ("ATE") is pleased to submit the following comments supporting PGE's 2026-2028 Transportation Electrification Plan ("TE Plan").

Background

ATE is a 501(c)(6) non-profit corporation established in early 2018 with the goal of promoting policies and regulatory measures to accelerate the pace of EV adoption and infrastructure. We primarily engage with policymakers at the State and local government level to remove barriers to EV adoption and to encourage the acceleration of EV infrastructure deployment with a particular emphasis on open standards and interoperability. We have over 60 members that include many electric utilities; automobile, truck and bus manufacturers; EV charging hardware and service providers; and related trade associations and non-profit organizations. We take a "big tent" approach to advance the industry and focus not just on accelerating EV charging deployments—which necessarily requires a strong utility role—but also promoting public accessibility and open standards. We are presently involved in about 30 proceedings in the States before public service commissions, Legislatures, state energy offices, state departments of transportation, and other agencies.

ATE's overall goals are to engage with public service commissions and other agencies to remove barriers to EV adoption by encouraging a collaborative and open approach to accelerate the deployment of EV charging infrastructure, sharing best practice across jurisdictions, supporting an appropriate utility role by complementing the private/competitive market, developing effective outreach and education measures, and promoting interoperability and open standards in all parts of the EV charging ecosystem.

A Streamlined, Customer-Focused Portfolio

ATE appreciates PGE's efforts to streamline their transportation electrification ("TE") portfolio, focusing on the highest-impact programs that are most tailored to the needs of the customers and communities that the utility serves. In ATE's experience, a small number of utility TE programs, managed effectively, deliver more efficient benefits than a broader number of hyper-specific programs that may lack the administrative resources to be successful.

We particularly appreciate PGE's use of program evaluations and customer and community feedback to help shape its programs. ATE has recently emphasized this

customer focus with our members in a new strategic focus for the next several years, which will complement our traditional focus on both TE infrastructure and EV adoption.

Revamping Residential Smart Charging

While PGE's Residential Smart Charging program is a clear success, it—along with many other utility residential managed charging programs—has faced headwinds due to exit from the North American market by certain vendors, and an evolving vehicle telematics approach. Still, these programs remain critical for many utilities to meet their goals to manage EV load in a grid-supportive way. ATE supports PGE's continued commitment to managed charging for residential customers and applauds the effort to enhance customer incentives and streamline enrollment and communications. To support these efforts, we shared with PGE our recent paper on customer enrollment in managed charging programs.[1] Our analysis focused on best practices from five leading utilities from every region in the country to boost enrollment and sustain customer engagement in such programs.

Evolving Commercial Charging Infrastructure Support

ATE supports PGE's efforts to adapt to customer feedback and needs and dedicate funding for commercial EV charging infrastructure (multifamily, workplace, public, fleet, etc.) through the popular Business EV Rebates program. ATE also supports the rebate reservation system, which is a best practice among utility programs to give customers surety of their rebate's availability as they proceed with installation of EV charging equipment at their site.

Exploring Commercial Managed Charging

PGE's proposal to explore managed charging for commercial customers (fleets, workplaces, and multifamily sites) puts it at the cutting edge of utility EV programs. The first commercial managed charging program in the country was launched by ConEd in New York just in February of last year. The initial results of this program—in terms of enrollment, customer education and outreach, and savings to customers—have been promising, and we have shared these results with PGE.

Because exploring such programs puts PGE in a leadership position in the country, ATE supports designating these efforts as "demonstrations" in the near-term. ATE expects that PGE will build on its strong relationships with fleet and other business customers,

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[1] Alliance for Transportation Electrification, Driving Participation in Managed Charging Programs. August 2025.

cultivated through its many years of support for EV charging infrastructure, to make these demonstrations successful.

Making Strategic Grid Investments

ATE supports PGE's strategic grid investments proposal, which is similar in some ways to the proactive grid upgrades approved or contemplated recently in states such as New York, California, Colorado, Massachusetts, and Minnesota. ATE is keenly focused on the rising risks of the current reactive, or "just-in-time" (frequently, not-in-time), distribution grid investment approach that most utilities follow. This approach, while adequate in times of low load growth, is increasingly insufficient in an era of load growth—especially load growth from transportation electrification, which can require significant distribution grid investment and can materialize on a much shorter timeline than similar amounts of stationary electrification load.

The risks for utilities and ratepayers associated with a reactive approach include:

- Unmet customer expectations for energization timelines
- A slowed pace of electrification—resulting in lost utility revenue and a missed opportunity to put downward pressure on electric rates
- Customer technology lock-in, as customers opt for non-electric alternatives in face of lengthy energization timelines
- Potential for higher long-term costs for ratepayers due to a piecemeal distribution grid upgrade approach (as identified in research by the Environmental Defense Fund and drawing on detailed data from CenterPoint Energy and Con Edison)[2]
- Potential for missed state energy policy goals

To mitigate these risks, ATE advocates that utilities engage in proactive distribution grid planning and, where appropriate, Commissions approve utility investments in distribution grid upgrades in advance of load letters from specific customers.

While PGE's proposal for strategic grid investments is not at the scale under consideration in some of these other states, ATE finds it an appropriate first step toward understanding the process for evaluating, selecting, and upgrading certain constrained grid assets to support an electrified future. In the future, ATE expects that this type of investment will be a hallmark of utility distribution system planning, and will be broadly undertaken by utilities to address multiple types of load growth as a matter of course.

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[2] Black & Veach for Environmental Defense Fund, Proactive Grid Investment Assessment: Medium- and Heavy-Duty Vehicle Transportation Electrification. November 2024.

Hardware and Software Interoperability

ATE continues to encourage the use of qualified product lists—such as EPRI's Vetted Product List,[3] which PGE relies on—which allow utilities to exercise some measure of quality control for the hardware and software that are deployed within its programs. In addition, we strongly recommend that all residential and non-residential EVSE on these lists, as well as any hardware and software that utilities invest in directly, be fully compliant with Open Charge Point Protocol ("OCPP").[4] This important protocol allows different hardware and software to communicate with each other, meaning customers can change software providers while maintaining the same hardware, or vice versa. This provides a crucial element of reliability so that hardware can remain operable even if a software vendor exits the market. Given that the EV charging market has seen multiple such exits just in the past year,[5] to the detriment of driver and customer experience[6] and utility program implementation, we continue to emphasize the importance of providers not simply advertising compliance with the latest version of OCPP standard, but actually implementing it in practice so that EVSE can be migrated seamlessly to a new network operator and hardware infrastructure investments—and ratepayer funds—are not stranded.

Conclusion

In summary, ATE continues its support for PGE's EV programs in Oregon, which comprise a thoughtful portfolio of activity to support EV adoption across customer segments. We find that PGE has clearly articulated the need for the program changes they propose in their 2026-2028 Transportation Electrification Plan. We encourage the Commission to approve PGE's TE Plan in a timely way, so that the utility can continue its strong momentum in Oregon and begin implementing these excellent programs.

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[3] Electric Power Research Institute. *Vetted Product List*.
[4] OCPP is an evolving standard that is managed by the Open Charge Alliance, based in the Netherlands. OCCP 2.0.1 ed3 was approved as an International Electrotechnical Commission (IEC) standard in 2024. https://openchargealliance.org/protocols/open-charge-point-protocol/
[5] Electrek. *Shell Recharge exits the US EV charger software market*. December 2024.
[6] Canary Media. *Enel X Way abandoned its US EV charging customers. What happens next?*. October 2024.