



September 19, 2025

Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, OR 97301-3398

RE: UM 2033 — PGE 2026–2028 Draft Transportation Electrification Plan Comments

The Green Energy Institute at Lewis & Clark Law School (GEI), NW Energy Coalition (NVEC), and the Oregon Environmental Council (OEC) (collectively “Joint Advocates” or “Advocates”) appreciate this opportunity to submit comments on Portland General Electric’s (PGE or “Company”) 2026–2028 Transportation Electrification Plan (TEP or “Plan”).¹ The Joint Advocates support PGE’s efforts generally to advance electric vehicle adoption and infrastructure build-out within its service territory in Oregon. In particular, we support the Company’s work towards supporting its underserved communities, as directed by HB 2165.² Particularly as federal incentives for and policies supporting electric vehicles dry up, utility investments will provide essential pathways towards transportation electrification and meeting Oregon’s climate goals.³ With these efforts, the Advocates believe PGE can better seize opportunities to more meaningfully support its underserved communities. The below comments largely focus on these opportunities.

The Advocates first want to emphasize our gratitude for PGE Staff’s engagement with our groups and others on this effort. Staff for the Company have made a concerted effort to reach out to members of this Advocates group to actively solicit feedback, provide answers, and keep informed of the process. These comments are submitted in appreciation of this engagement, and with confidence that PGE wishes for a community- and advocate-informed final plan.

¹ *In Re Portland General Electric Company, 2019 Transportation Electrification Plan*, Docket No. UM 2033, PGE’s 2026-2028 Transportation Electrification Plan (Jul. 18, 2025) [hereinafter PGE Draft 2026-2028 TEP], <https://edocs.puc.state.or.us/efdocs/HAQ/um2033haq338346027.pdf>.

² HB 2165 § 2(6), 2021 Or. Leg. Session (2021); ORS 757.357.

³ See Oregon Dep’t of Energy, *Draft Oregon Energy Strategy 53* (Aug. 2025) [hereinafter Oregon Draft Energy Strategy], <https://www.oregon.gov/energy/Data-and-Reports/Documents/DRAFT-Oregon-Energy-Strategy.pdf>.

I. Introduction and Background

This Plan stands as PGE’s third iteration of a Transportation Plan, and the second since the transportation guidelines were modified to focus on underserved communities with the passage of HB 2165 in 2021.⁴ We see PGE’s efforts to build on its successes and learn from challenges in this draft TEP. Many of these shifts, continuations, and improvements represent informed decisions to better support customers. We are concerned, however, that some of the shifts in this plan are premature, and arise from inherent challenges with reaching the underserved communities central to legislative direction in HB 2165. The below comments largely focus on the directive to reach underserved communities, with the goal of ensuring that this plan can best support a future of transportation in Oregon that will work for all.

The State is concurrently wrapping up the Oregon Energy Strategy,⁵ which “identifies optimized pathways to achieving the state’s energy policy objectives.”⁶ The Energy Strategy identifies Transportation Electrification as an essential pathway to meeting Oregon climate goals.⁷ These comments are influenced by some Advocates’ work on this Oregon Energy Strategy.

II. Strengths of PGE’s Plan

The following areas we see as strengths of this plan and commend PGE for including.

A. Continuing an income-qualified discount at PGE charging stations.

This TEP draft includes the income qualified discount for public charging—introduced during a recent rate case.⁸ We support PGE continuing these discounts, as a parallel for PGE customers’ at-home discounts for income-qualified customers. This discount also aligns with PacifiCorp’s similar discount, offered to qualified customers.⁹ Since both utilities now have discount programs, **we ask PGE to consider working with PacifiCorp to explore opportunities for reciprocity between the two utilities’ customer discounts.** PGE’s customers’ charging habits may not neatly fit into utility territories. The dual offering of similar income-qualifying discounts, intended to be used by customers outside of their homes, offers a unique opportunity for cross-utility collaboration to ensure qualifying households can best use available discounts.

B. Expanding managed charging and grid investments.

Electrification of Oregon’s transportation will require targeted management to limit negative impacts to the grid and rates. We support PGE’s expansion of managed charging, including exploring vehicle-to-grid capabilities and deployment. The commercial managed charging program, in particular, has potential to provide significant benefits or limit the impacts of

⁴ ORS 757.357, sec. 2.

⁵ Oregon Draft Energy Strategy, *supra* note 3.

⁶ ORS 469.062(1).

⁷ Oregon Draft Energy Strategy, *supra* note 3, at 53.

⁸ PGE Draft 2026–2028 TEP at 35.

⁹ *In Re PacifiCorp Oregon Transportation Electrification Plan*, Docket No. UM 2056, PacifiCorp’s 2026–2028 Transportation Electrification Plan, at 90–93 (May 1, 2025), [https://edocs.puc.state.or.us/efdocs/HAH/um2056hah336524034.pdf](https://edocs.puc.state.or.us/efddocs/HAH/um2056hah336524034.pdf).

increased fleet electrification. Particularly as heavy duty vehicles electrify, these charging habits must be brought on to the grid in a way that minimizes—or better yet improves—grid reliability concerns and rate impacts.¹⁰ The Draft Oregon Energy Strategy identifies grid constraints as a barrier to meeting climate goals through transportation electrification.¹¹ While some questions remain about the new Strategic Grid Investments, we overall support PGE using MMC outside the rate base to integrate vehicle charging onto the grid to minimize customer rate impacts.¹²

III. Opportunities for Improvement

Advocates see various areas for PGE to improve its programs to this Plan best supports its underserved communities, outlined below.

A. Reaffirm and expand on commitment to resourcing underserved communities

One primary purpose of this plan, as outlined in the Commission’s rules, is to address how the company plans to reach underserved communities.¹³ The below comments note some areas we think PGE could improve its Plan to address these requirements.

i. Concern over sunseting programs targeted to reaching underserved communities

This proposed Transportation Electrification Plan suggests sunseting or reducing resources for three programs that were targeted towards providing charging resources for underserved populations in the previous TEP: the Municipal Curbside Charging program, the EV Ready Affordable Housing Grant program, and the Municipal Pole Charging program. These programs were thoughtfully developed in PGE’s prior TEP. Reaching underserved communities often requires greater time and resources. A lack of success in the first three years of implementing these programs should not necessarily lead to their retirement. We are therefore concerned that removing these programs is premature and offer suggestions to ensure the impetus behind the initial offerings continues through this TEP.

Supporting affordable multifamily housing EV charging. PGE has asked funds from the Business & Multifamily Make Ready program be reallocated to the Business EV Rebates Program.¹⁴ We understand PGE faced significant barriers in this affordable housing program, most notably a lack of interest and inability to fully fund projects under the program structure.¹⁵ If the Commission approves PGE’s request to shift funds to the Business EV Rebate Program we ask the underlying intent of the original affordable housing program to continue through: getting more EV charging into affordable housing projects so renters with lower incomes are not left behind in the electric vehicle transition. We appreciate that PGE is trying to do so, by offering

¹⁰ Oregon Draft Energy Strategy, *supra* note 3, at 25.

¹¹ *Id.* at 24-25.

¹² It is Advocates’ understanding that projects funded through the MMC will not be included in PGE’s rate base and therefore will not earn a return on investment. However, if this is not the case, Advocates’ position on the issue may change.

¹³ OAR 860-087-0020(3).

¹⁴ PGE Draft 2026–2028 TEP at 33.

¹⁵ PGE Draft 2026–2028 TEP at 33.

enhanced rebates for multifamily and for installation in underserved communities, with an intent that these rebates can fully fund projects.

But we are concerned that the current manner of evaluating projects may not realize this intent. **We suggest PGE incorporate criteria for assessing these projects, described in Section 3.A.ii below, to ensure the projects receiving the greatest funding under the revised business EV rebates are the ones where that funding will have the greatest impact, e.g. in affordable housing developments.**

Municipal Pole Charging Pilot. The Municipal Pole Charging Pilot arose as an important avenue to providing affordable charging access, particularly to households in neighborhoods with high levels of multifamily housing or in areas where on-street parking is more common. PGE’s 2026–2028 TEP announces that the Company has no plans to install new municipal pole chargers after it faced “significant barriers” to the program’s progress.¹⁶

PGE has put extensive analysis into its pole charging program, including in a report in its 2024 TEP Update.¹⁷ We see the program evaluation of the pole charger pilot as indicating that PGE should improve upon the program, rather than decide to not install new chargers. For example, program analysis flagged PGE staffing turnover as a barrier to effective communication with municipalities.¹⁸ Outreach to community members was also hampered by PGE “staff transitions” and data issues with PGE’s customer contact lists.¹⁹ In sum, many “significant barriers” PGE faced identify multiple issues that are administrative learnings, rather than issues with the pole charging program itself. These meaningful lessons learned should build a better program, not provide reason to abandon one. Meanwhile, municipal interest appears to still be growing—multiple cities have commented regarding continued interest in pole chargers on PGE and Commission-hosted calls.

PGE is turning away from this project prematurely, especially as the program seems to be finally overcoming some initial hurdles of municipal buy-in, staff learnings, and safety review.²⁰ We appreciate that PGE plans to continue to support the install chargers that are installed. But we are disappointed that PGE will no longer pursue expansion of the program. Working with municipal governments can be a slow process but can pay dividends.

This Plan’s direction is premature given increasing municipal support from the program. **We ask PGE to consider redirecting funds back into the program from Business EV Rebates to support program expansion, including municipal engagement on the program, over the next three years.**²¹ **At the very least, PGE should remain open to redirecting the funds,**

¹⁶ PGE Draft 2026–2028 TEP at 35.

¹⁷ Docket No. UM 2033, PGE’s 2024 Transportation Electrification Annual Report, app. A (May 1, 2025) [hereinafter PGE 2024 TEP Report], <https://edocs.puc.state.or.us/efdocus/HAQ/um2033haq336533034.pdf>.

¹⁸ *Id.* app. A, at 64 (noting PGE staffing turnover as a challenge with program implementation).

¹⁹ *Id.* at 65.

²⁰ On a recent call, PGE staff reported that two new cities recently expressed interest in the pole chargers. Advocates also understand that the cities of Portland and Milwaukie remain interested in new pole chargers.

²¹ *See* PGE Draft 2026–2028 TEP at 106.

should interest arise from new or already-served municipalities. This program is filling a needed gap in access to charging infrastructure, and should continue to be prioritized, even if the program faced initial challenges.

ii. Concern over funneling work with underserved communities into Business EV Rebates Program²²

PGE is planning for an expansion of its Business EV Rebates program within this next TEP, in large part to absorb funding and work devoted to programs targeting underserved communities. We understand some motivation behind this move to bolster an already successful program. And we support shifts within the Business EV Rebates program to better target it to underserved communities. The following are elements of the program revision that we support:

- Augmenting rebates for multifamily properties and underserved communities
- Removing rebate eligibility for DC Fast Charging projects outside of underserved communities
- Support to cover up to 100% of targeted projects

But these shifts do not yet capture the intent behind the programs it is absorbing to meaningfully support underserved communities. For example, under the broad definition of underserved communities, we worry these rebates could be funneled towards covering full EV charger installation costs at luxury apartment buildings. While this may fit the letter of the law under HB 2165,²³ funds would provide much more meaningful support if targeting projects less likely to have available funds for charging—like affordable housing developments. Especially as PGE replaces multiple programs directly targeted to underserved communities, like the EV Ready Affordable Housing Grants, with Business EV rebates, PGE must establish criteria to prioritize projects that can fulfill these initial goals and directives.

We ask PGE to adopt methods to prioritize or filter projects applying for funding under the Business EV Rebate program based on equity metrics. PGE can engage with advocates and community groups to develop a matrix of metrics to determine projects best aligned with the directive to support EV developments in underserved communities—and prioritize these projects to receive full funds under the program. For example, PGE may cover a greater percent of funds for multifamily projects providing designated affordable housing. Or a workplace located in an underserved census tract may only be considered for the enhanced installation funds if it agrees to allow the public to access the charging station. Finally, use of these rebates should be carefully tracked and reported on to better understand the impacts.

iii. Create opportunities for feedback and review of strategic grid investment opportunities

This TEP proposes a new investment area for Strategic Grid Investments to support EV-enabling grid upgrades with anticipated EV load constraints.²⁴ We support the impetus behind these investments: as EVs, and particularly medium-and-heavy duty EVs, become more widely

²² See PGE Draft 2026–2028 TEP at 88.

²³ ORS 757.357, sec. 2.

²⁴ PGE Draft 2026–2028 TEP at 72–73.

deployed, our grid will be taxed and require upgrades. Charging interconnection could threaten beneficial transportation electrification and we appreciate that this project plans to address that barrier through demonstration projects. We also appreciate that these grid investments will not go into PGE's rate base, thereby limiting impacts to customers.²⁵ Grid investments typically now undergo scrutiny and engagement in the Commission's Distribution System Planning (DSP) process, under extensive guidelines and comment opportunities.²⁶ These include requirements to examine projects for non-wires alternatives. This engagement does not appear to be included in the demonstration project selection and design process for Strategic Grid Investments.

We ask PGE and the Commission to ensure the selection of grid investment demonstration projects best support the public and follow DSP best practices and guidelines established by the Commission.²⁷

iv. Seeking greater transparency & granularity in reporting on underserved metrics

PGE has made an effort to expand its analysis and reporting of metrics on reaching underserved communities as directed by HB 2165. Despite these efforts, PGE's reporting on underserved metrics oversimplifies project impacts and threatens to hamstring PGE's efforts to meaningfully support underserved communities and households. This comment is more relevant to reporting on this Plan, but we are including it here because we do not anticipate commenting again before the next Report is filed.

Under Commission Rules, PGE must file a TE Plan Report annually, reporting on metrics including the Plan's support for "underserved community inclusion and engagement" as well as "equity of program offering to meet underserved communities."²⁸ The Advocates appreciate PGE's engagement of our Advocates group on reporting these metrics, often convening a small group for a presentation. But the reporting often oversimplifies the reach of PGE's programs, feedback we have provided in these meetings.

For example, in reporting the underserved impacts of its Residential Smart Charging Pilot, PGE's discussion with advocates indicated that the Company considers any residential charger installed within a census tract identified as meeting any underserved definition towards its underserved spending metrics.²⁹ Meanwhile, surveys indicate that around 80% of households participating in the residential pilot have incomes of over \$100,000 and almost all own their own (non-multifamily) homes.³⁰ Additionally, a workplace charger installed in a census tract with a high proportion of renters, residents of color, or households with low incomes does not mean that

²⁵ As mentioned above, this is Advocates' understanding of PGE's rationale but our position is subject to change if PGE intends to rate base investments made with MMC funds.

²⁶ See *Public Commission of Oregon, Investigation Into Distribution System Planning*, Docket No. UM 2005, Order No. 24-241 (Nov. 15, 2024).

<https://apps.puc.state.or.us/orders/2024ords/24-421.pdf>.

²⁷ *Id.*

²⁸ See OAR 860-087-0030(1)(d); OAR 860-087-0020(3)(c)(C)-(D).

²⁹ PGE 2024 TEP Report, *supra* note 17, app. A at 22 (May 1, 2025),

<https://edocs.puc.state.or.us/efdocs/HAQ/um2033haq336533034.pdf>.

³⁰ *Id.*

these residents can access or benefit from this charger.³¹ Overall, PGE’s assessments fixate on census tract data to neglect some more nuanced applications of charging infrastructure. In fact, the “interview guide” included in PGE’s 2024 report incorrectly states that HB 2165 defines underserved communities by census tract.³² The legislative directive is to “support transportation electrification in underserved communities” through “programs, infrastructure, rebates or expenses that support... [t]he use of electric vehicles by” underserved communities.³³ Census tracts can provide meaningful insight into program deployment but should not be used as confirmation that PGE’s programs and rebates support the use of electric vehicles by residents of these communities.

We ask PGE to work with stakeholder groups, consultants, and community organizations to better tailor its reporting away from its reliance on census tracts.

Appendix H in the Draft Plan outlines PGE’s efforts to more narrowly tailor its outreach to census tracts with overlapping metrics, an effort we generally support.³⁴ We are excited to see PGE incorporate this into outreach but don’t see elements of the plan addressing how these enhanced metrics will be used. More granular and individualized data would better support meaningful outreach and reporting. For example, a survey of participants in the smart charging pilot, with optional demographic information, may provide better insights.

Finally, this Plan states that over 84% of its ports installed under PGE’s Fleet and Workplace will benefit underserved communities,³⁵ when its fleet ports are only slated to be available for PGE employees and fleet vehicles.³⁶ It is also listed in another table for spending on underserved communities. **We ask PGE to clarify how its Fleet and Workplace investments support the use of electric vehicles by underserved communities in its Reply or in the final plan.**

B. Prepare for future electric vehicle needs

Ultimately, these transportation plans are helping prepare PGE and Oregon to meet future electric vehicle needs. Many elements of the plan do seek to do that, but our comment highlights areas we still see as lacking in the plan to address long-term needs for Oregon: heavy duty charging infrastructure and fleet support.

i. Investing in heavy duty charging infrastructure

Diesel emissions from medium and heavy duty vehicles negatively impact communities across Oregon.³⁷ A lack of public medium- and heavy-duty EV charging infrastructure has already been

³¹ *Id.* at 24-26.

³² *Id.*, app. A at 130.

³³ ORS 757.357 Sec. 2(6).

³⁴ PGE Draft 2026–2028 TEP at app. H, p. 140.

³⁵ *Id.* at 52, tbl. 14.

³⁶ *Id.* app. A, p. 79.

³⁷ Amy Schlusser et al., Green Energy Inst., *Deconstructing Diesel* (2019), <https://law.lclark.edu/live/files/28596-deconstructing-diesel-roadmap>; *Diesel Emissions Inventory: 2017 Emissions Inventory*, Or. Dep’t Env’t Quality, <https://www.oregon.gov/deq/aq/programs/pages/diesel-emission-inventory.aspx> (last visited Sept. 17, 2025) (on-road heavy duty vehicles cause half of diesel

identified as a significant gap in Oregon’s needs to electrify and decarbonize its transportation system.³⁸ PGE’s 2026–2028 TEP, in the forecast section, correctly mentions that enforcement of the Advanced Clean Trucks (ACT) rules, aimed at increasing market sales of electric medium and heavy duty vehicles, has been delayed until 2027, “due to market challenges and federal policy uncertainties.”³⁹ The Plan does not mention that lack of heavy-duty charging infrastructure contributed to trucking industry opposition to the Clean Truck rules.

PGE’s service territory includes stretches of highways along essential transportation routes like I-5 between Salem and Portland. Considering the constraints of medium- and heavy-duty public charging, we don’t see sufficient support in this plan for public heavy duty charging. As PGE’s Plan notes, developing heavy-duty charging infrastructure necessitates extended timelines. If PGE is not beginning site development now, heavy duty public charging projects likely will not be online before 2027 and ACT implementation.⁴⁰

PGE’s new Commercial Managed Charging program and Strategic Grid Investments will examine pathways towards public heavy duty charging, like facilitating interconnection and managing grid impacts. Meanwhile, PGE’s express work on heavy duty charging in this plan is limited to its work on Electric Island. While this demonstration project will provide insights, it does little to expand heavy duty charging along transportation corridors like I-5 or I-84. Additionally, the Electric Island Project does not anticipate expanding charging infrastructure.

First, We ask this plan to more expressly support heavy duty charging infrastructure beyond Electric Island. Failing to do so will continue to threaten Oregon health outcomes through further delay of electric truck sales.

Second, we ask PGE to clarify funding for its heavy duty Charging Pilot. Table 78 of the plan indicates that the heavy duty pilot is funded through the rate base, as opposed to the meter charge.⁴¹ But Table 82, outlining detailed portfolio spending does not include any funds for Heavy Duty Charging Pilot, either in the Base Rate or otherwise. Meanwhile, PGE’s 2023 TEP outlined \$3.6 million for the Heavy Duty Charging Pilot from the rate base.⁴²

ii. Continuing Fleet Support

This Draft TEP proposed reducing the relative budget of PGE’s Fleet Partners Program, citing various constraints including supply chain issues and lower than expected fleet electrification. If anything these are reasons to maintain support for burgeoning EV fleets across PGE’s service territory. Advocates have heard from others in the space, like municipalities, that the Fleet

emissions); Or. Dep’t Env’t Quality, *The Concerns about Diesel Engine Exhaust* (2016), <https://www.oregon.gov/deq/FilterDocs/DieselEffectsReport.pdf>.

³⁸ Oregon Draft Energy Strategy, *supra* note 3, at 59.

³⁹ PGE Draft 2026–2028 TEP at app. D, at 128.

⁴⁰ *See also* Oregon Draft Energy Strategy, *supra* note 3, at 59 (noting the long timelines to develop heavy duty charging infrastructure).

⁴¹ PGE Draft 2026–2028 TEP at app. C, at 121, tbl. 78.

⁴² Docket No. UM 2033, PGE’s 2023 Final Transportation Electrification Plan, at 154 (Aug. 25, 2023), <https://edocs.puc.state.or.us/efdocs/HAH/um2033hah15818.pdf>.

program provides essential support for EV fleet deployment. We ask PGE to continue to increase support for its fleet program relative to its prior support.

IV. Other Comments

We ask PGE to resubmit its 2026–2028 Transportation Plan with searchable PDF pages and/or ensure the final plan is fully searchable. Advocates’ review of this 163 page document was frustrated by an unintended PDF glitch discovered later in our review: pages in the PDF with tables may not be searchable when downloaded.⁴³ Unfortunately, this glitch impacts many pages of the plan, including the tables with details of all existing and proposed programs in appendices A and B. We understand this is an unintentional glitch but still ask PGE to ensure that its final plan has fully searchable pages to support access and review. We hope the Commission and PGE understand if Advocates missed information on non-searchable PDF pages within the Plan.

V. Conclusion

PGE’s 2026-2026 TEP continues the Company’s trajectory of investments in Oregon’s clean vehicle future. PGE is working hard to address customer needs, address affordability and reliability concerns, and meet its obligations under HB 2165. We hope these comments provide some guidance in this plan and its implementation to foster more meaningful support for underserved communities. And we look forward to continuing to work with PGE staff throughout this plan’s implementation to facilitate a transportation future for all Oregonians.

Respectfully Submitted,

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⁴³ This glitch appears to most impact the PDF when read in Adobe, while other applications, like Preview, may be able to search these pages partially. This glitch is from the PDF downloaded from UM 2033, found at: <https://edocs.puc.state.or.us/efdocs/HAQ/um2033haq338346027.pdf>.