



375 Alabama Street  
Suite 325  
San Francisco, CA 94110

Amanda Myers Wisser  
Director, Policy and Regulatory Affairs  
amanda.myers.wisser@weavegrid.com

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Public Utility Commission of Oregon  
Attn: Filing Center  
PO Box 1088  
Salem, OR 97309-1088

**Re: Docket No. UM 2033 — Comments of Weave Grid, Inc. on Portland General Electric’s Draft 2026-2028 Transportation Electrification Plan**

Dear Commissioners and Staff,

Weave Grid, Inc. (“WeaveGrid”) respectfully submits these comments on the Draft 2026-2028 Transportation Electrification Plan (“TEP” or “Plan”) filed by Portland General Electric (“PGE” or “the utility”) to the Public Utility Commission of Oregon (“Commission” or “OPUC”) on July 18, 2025.<sup>1</sup>

**I. Introduction**

WeaveGrid is a software company that helps utilities support increased adoption of electric vehicles (“EVs”) through greater understanding of customer charging behaviors, managed charging programs, and distribution-level charging optimization. Our platform leverages direct, authorized integrations with automakers and charging networks to securely access charging data and controls, enabling utilities to transform disaggregated charging behavior into a coordinated, flexible grid resource. WeaveGrid is a market leader in providing these solutions, including supporting PGE’s Residential Smart Charging Pilot and Smart Grid Test Bed.

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<sup>1</sup> Portland General Electric, Draft Transportation Electrification Plan 2026-2028, July 18, 2025, <https://edocs.puc.state.or.us/efdocs/HAQ/um2033haq338346027.pdf>.

## II. Comments

WeaveGrid applauds Portland General Electric for putting forth a broad and advanced Transportation Electrification Plan for program years 2026 through 2028. WeaveGrid recommends that the Commission accept PGE’s Draft TEP.

WeaveGrid supports the “manage” pillar of the proposed TEP. Managing EV load reinforces affordability and reliability priorities. In particular, WeaveGrid strongly supports PGE’s proposed extension, expansion, and modifications to the Residential Smart Charging Pilot (“Pilot”).

### a. The Pilot has a proven track record

The Pilot was well-reviewed in its utility review as well as third-party, independent evaluation.<sup>2</sup> Continuing this Pilot is substantiated by positive cost-effectiveness scores, equity benefits, high customer satisfaction, and low opt-outs. The Pilot scored well across three different cost-effectiveness tests: RIM (1.12), TRC (2.71), and SCT (3.30).<sup>3</sup> These scores are all higher than what was forecasted and the expressed rationale is that this is due to a significant increase in forecasted ports and energy usage. Therefore, we believe that PGE’s request to expand the Pilot with the target of 12,500 ports by end of year 2028 and 3.85 MW under management from this Pilot should be viewed by the Commission favorably given the track record of this Pilot and the evidence that benefits scale with a greater size of the Pilot.<sup>4</sup> Notably, 64 percent of Pilot participants reside in underserved communities, indicating that the program design is equitable.<sup>5</sup>

### b. The Pilot’s proposed amendments will augment Pilot benefits

We support PGE’s proposed modifications, including enhanced load control tools and increased incentives. While an 8 to 10 p.m. window remains a critical time for system management, we especially endorse PGE’s intent to evolve beyond static demand response windows toward more dynamic, distribution-aware optimization strategies.<sup>6</sup>

We believe increased incentives will help meet the participation target which will in turn create customer and grid benefits. Transportation electrification relies on customer

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<sup>2</sup> Portland General Electric, 2023 Transportation Electrification Plan report, May 1, 2024, <https://edocs.puc.state.or.us/efdocs/HAQ/um2033haq328284024.pdf>.

<sup>3</sup> 2023 TEP report, p. 26.

<sup>4</sup> Draft TEP 2026-2028, p. 116.

<sup>5</sup> Draft TEP 2026-2028, p. 119.

<sup>6</sup> Draft TEP 2026-2028, p. 36 and 117.

adoption and that can be encouraged with customer cost savings. We also note that affordability remains a pressing concern as Oregon and federal EV incentives become limited or removed as well as widespread consumer inflationary impacts persist. Enhancing program incentives will help maintain robust participation and ensure that transportation electrification continues to deliver affordability benefits to all customers.

**c. WeaveGrid agrees with the utility’s aim to incorporate more distribution grid learnings**

WeaveGrid is particularly supportive of PGE taking learnings from its Smart Grid Test Bed EV Charging Study (“Study”) and applying those to the Pilot. The Test Bed demonstrated that EV managed charging can mitigate distribution impacts and maximize benefits through load smoothing. The current Pilot boasts 91 percent off-peak charging and PGE expects that proposed Pilot improvements may yield even higher off-peak charging attainment.<sup>7</sup> WeaveGrid agrees that optimizing EV load for not just bulk system impacts but also distribution system impacts can increase the efficacy of the Pilot.

An Argonne National Laboratory report commissioned by the Exelon utilities as part of Department of Energy grant found \$300 per EV per year in savings from distribution-focused managed charging compared to unmanaged charging scenarios.<sup>8</sup> Moreover, California’s Public Advocates Office found it would cost \$26 billion to upgrade California’s investor-owned utilities’ distribution grids by 2035 based on EV impacts.<sup>9</sup> These studies indicate the disproportionate impact that EVs have on downstream distribution infrastructure and the value of distribution-focused EV managed charging and corroborate findings in PGE’s Smart Grid Test Bed EV Charging Study. The next step is scaling from single-feeder insights to broader deployment across PGE’s service territory. **We strongly support PGE’s efforts to validate these benefits at scale and evolve the Pilot accordingly.**

**III. Conclusion**

WeaveGrid appreciates the opportunity to submit these comments recommending acceptance of PGE’s Draft Transportation Electrification Plan 2026-2028. We thank the

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<sup>7</sup> Draft TEP 2026-2028, p. 119.

<sup>8</sup> Argonne National Laboratory, Advancing Grid Resilience through Smart Charge Management: Findings from Maryland’s Pilot, April 1, 2025, Maryland Public Service Commission Case No. 9478.

<sup>9</sup> The Public Advocates Office, Distribution Grid Electrification Model Study and Report, August 2023, <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/230824-public-advocates-distribution-grid-electrification-model-study-and-report.pdf>.

Commission and Staff for consideration of these comments and look forward to continued engagement.

Respectfully submitted,

/s/ Amanda Myers Wisser

Amanda Myers Wisser

Director, Policy and Regulatory Affairs

WeaveGrid

Email: [amanda.myers.wisser@weavegrid.com](mailto:amanda.myers.wisser@weavegrid.com)