

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2033

In the Matter of

PORTLAND GENERAL ELECTRIC,
2026-2028 Transportation Electrification Plan.

Staff Comments

Introduction

Staff appreciates the work Portland General Electric (PGE or the Company) put into this draft Transportation Electrification (TE) Plan (the Plan) for 2026-2028. In these Comments, Staff will discuss the Plan strategy and Budget, suggestions for benefit-cost analysis, capacity contribution of managed charging, and portfolio performance areas. Staff recommends a general adjustment to PGE's TE Budget and makes specific recommendations for the Company to address in Reply Comments where Staff finds additional information is required.

PGE's Plan Strategy

While electrification generally is part of PGE's broader corporate strategy, Staff also observes specific choices in the Plan showing the Company working within a budget constraint to stabilize total cost. Total overall spending proposed in the Plan remains relatively similar to the 2023-2025 TE Budget. The draft Plan has a three-year budget of \$103.1 million, of which 61 percent is ratepayer-funded. Several tables in the draft Plan show a total of \$90.8 million. However, the Plan includes investments of \$12.3 million in PGE fleet electrification and workplace chargers elsewhere.¹

While this Plan contains several small demonstration projects, PGE does not propose to launch new pilots. However, the Company's inclusion of the electrification of PGE's own fleet and supply of workplace chargers to PGE employees were initiated both prior to filing its first TE Plan in 2019. The Company has included them for the first time in this TE Budget.

¹ Draft 2026-2028 TE Plan, Table 7, at 44,45 (July 18, 2025).

To fit PGE’s fleet and workplace charging into a relatively similar level of total spending as the previous TE Budget, Staff observes some reductions the Company has made. As shown in Table 1 below, the inclusion of \$12.3 million for PGE’s fleet and workplace charging and \$9.4 million in new demonstration projects corresponds with cutbacks in other areas, such as Fleet Partner.

Table 1: Comparison of Proposed 2026-28 TE Budget with Previous 2023-25 in \$Thousands

Program/Measure	2023-25 Budget	Proposed 2026-28 Budget
Business Charging	5,336	14,138
Charging Resiliency Hub	0	3,384
Clean Fuels Program	43,330	38,800
Affordable Housing Grants	1,000	0
Fleet Partner	18,117	5,658
Company-owned Public Chargers	15,649	4,938
Commercial Managed Demonstrations	0	2,764
Heavy Duty Charging Pilot	3,620	773
Portfolio Support	2,487	5,488
Residential Smart Charging	6,493	11,633
Strategic Grid Initiatives	0	3,253
PGE’s Fleet and Workplace Charging	0	12,293
Total	96,032	103,122

Managed Charging

PGE has been working on reducing the impact of residential EV charging on the Company’s grid, and this Plan proposes a new effort to extend this work to commercial customers. In reviewing the Plan, Staff used a method consistent with how PGE estimates coincident peak to find the capacity contribution of PGE’s Residential EV Smart Charging Program. Using 2026 loss of load probability (LOLP) from PGE’s current Integrated Resource Plan (IRP) update, Staff found the control group, program participants whose charging PGE does not manage, charges at a lower coincident peak than the study groups PGE is managing. This suggesting this measure has no capacity contribution.² Using the IRP’s 2030 LOLP hours, Staff found a positive contribution close to zero.

Benefit/Cost Analysis

This TE planning cycle is the first in which Staff is using benefit/cost analysis (BCA) as a budget guardrail. Per Staff Guidance adopted by Commission Order No. 25-028, Monthly Meter Charge (MMC) expenditures are statutory minimum spending levels and do not require cost-effectiveness for Commission approval.³ Only elective expenditures of ratepayer funds beyond the MMC are subject to cost-effectiveness at the portfolio level. Order No. 25-028 adopted four perspectives: the Utility Cost Test (UCT),

² ELCC 2026 2030 CONF KA.

³ See In the Matter of Staff Investigation of TE Investment Framework, Docket No. UM 2165, PUC, Order No. 25-028 Appendix A at 7-8 (February 5, 2025); <https://apps.puc.state.or.us/orders/2025ords/25-028.pdf>.

Ratepayer Impact Measure (RIM), the Total Resource Cost Test (TRC), and the Societal Cost Test (SCT), from which utilities can select one to demonstrate cost-effectiveness. This information is intended to provide Staff and the Commission insight into how to assess the ratepayer-funded portion of PGE's TE Budget in a way that weighs costs with customer and system benefits.

The BCA PGE performed in this Plan shows the value of allowing multiple perspectives. While the Company found a RIM BCR of 0.85, PGE's analysis shows the proposed portfolio cost-effective under two other tests, with a TRC BCR of 1.21 and a SCT BCR of 1.52.⁴ Staff reviewed PGE's benefit-cost analysis and highlights some methodological concerns and suggestions for the Company.

Staff found the Company may underestimate cost effectiveness by not including the social benefit of reducing particulate matter emissions of 2.5 micrometers (PM_{2.5}). Staff would like to see the Company's analysis adjusted to reflect this impact, but PGE has not provided the PM_{2.5} intensity of the Company's system for a net assessment for Staff to incorporate. The other two electric companies' PM_{2.5} intensity is too high for TE to provide a net reduction in PM_{2.5} emissions for vehicles powered by gasoline engines. Staff is hopeful the closure of the Boardman coal plant makes PGE's PM_{2.5} intensity low enough to provide a better social impact for this important pollutant.

In contrast, Staff also found ways in which PGE may have overestimated the cost-effectiveness of its portfolio: **[BEGIN CONFIDENTIAL]**

1.

[REDACTED]

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Staff modified PGE's BCA, correcting the inputs for the points above. These changes reduced the TE Budget's Societal Cost Test BCR from 1.52 to 0.73. Staff does not see evidence the Company's proposed TE Budget is cost-effective from a societal perspective.

These results raise interesting questions about program design. Are there opportunities for PGE to cut administrative costs that could provide similar benefits at a lower cost? Which measures deliver the most societal benefit for the least cost? Additionally, as budgetary options, Staff observes that many of the new spending areas PGE has included in this TE Budget have potential justifications on merits beyond TE:

⁴ PGE 2026-2028 Draft Transportation Electrification (TE) Plan at 46 (July 18, 2025).

- Staff has supported PGE’s workplace chargers as an amenity to PGE employees. Recovery of these costs might be justified as part of a broader package of employee benefits needed for retention.
- In UE 435, when PGE explained the Company’s crews face operational restrictions from municipal noise ordinances, Staff supported recovery for electrification of the buckets on operational grounds. Noise-compliant electric booms allow PGE’s crews to work at all hours. Staff observes these vehicles are the only fleet electrification PGE has included in this TE Budget.
- PGE’s heavy-duty charging expenditure is for distributed solar and batteries at Electric Island. These might receive justification independently for their distributed resource value.
- Residential EV Smart charging could transition to PGE’s Flexible Load Plan. However, given its low-capacity contribution, managed charging’s resource value may be limited. Alternatively, the rebate portion could be seen as a subsidy for purchasing an EV which might be limited to low-income customers. Pacific Power, for example, has proposed eliminating the standard residential rebate, noting evidence of high free ridership, providing subsidies to customers that would have purchased an EV anyway.

In addition to budget adjustments, Staff sees two opportunities for further adjustment to PGE’s BCA. First, as mentioned above, Staff would like to see PGE account for the benefit of PM_{2.5} emissions reductions. Also, an option specified in Order No. 25-028 is worth highlighting here. PGE can provide an alternative analysis that removes MMC expenditures on underserved communities. which would also remove these expenditures’ benefit from that alternative analysis. This option may be helpful if a portfolio without those expenditures would have a higher ratio of benefits to costs had the legislature not mandated a 50 percent allocation of MMC funds for underserved communities.

Since the SCT consistently shows the highest BCR, **Staff recommends PGE adjust the TE Budget of ratepayer funds and benefit/cost analysis to reach a societal cost test benefit/cost ratio of 1.0 or greater, per Order No. 25-028.**

EV Market

The Plan and its corresponding TE Plan Report provide helpful information about the EV market in PGE’s service territory. Staff highlights two key metrics in these Comments. First, PGE has overestimated EV adoption, particularly with heavier vehicles. Table 2 below shows the difference for 2024.

Table 2: PGE’s EV Adoption Forecast for 2024 vs. Actuals from Table 5 in PGE’s 2025 TE Plan Report

Vehicle Weight	2024 Forecast	2024 Actuals
Light Duty	82,342	67,190
Medium Duty	9,576	31
Heavy Duty	203	124

Staff sees opportunities for collaboration with PGE on this matter. The Company has accurately identified the primary problem. Heavier duty vehicle adoption may be more policy dependent than light duty vehicles. Staff would like to work with PGE on developing expected values for forecasting policy drivers which would include an assessment of probability with the expected impact. Also, Staff has access to State of Oregon data showing PGE's medium duty vehicle count was much greater than 31 in 2024.⁵ Staff would like to confirm PGE still has access to this data set.

Another key market metric Staff follows closely is the average capacity factor of public chargers in each electric company's service territory. Staff observes [BEGIN

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Performance Areas

PGE's reporting on the performance areas established in Division 87 rules and specified with stakeholder-chosen metrics in Order No. 25-028 has improved both in terms of reporting and the Company's documented performance. For example, PGE deserves credit for focused engagement with underserved communities. In these Comments, Staff highlights three areas of focus from Staff's review of PGE's 2025 TE Plan Report and draft 2026-2028 TE Plan worth further engagement in this proceeding.

First, Staff would like to better understand the income distribution of low-income program participants in PGE's Residential EV Smart Charging Program. Staff's prior expectation is that this distribution is likely to be skewed near the cut-off of income eligibility. **Staff recommends, in Reply Comments, PGE provide the income distribution of new low-income qualifying Schedule 8 participants in 2024.** Staff intends to analyze this distribution to inform review of program standards for low-income eligibility.

Second, Staff would like to better understand how PGE identifies which multifamily housing sites are underserved. In the past, PGE cited Oregon law as the basis for considering all multifamily housing to be underserved. However, rather than assign 100 percent as underserved, PGE's 2025 TE Plan Report measures this as 96 percent.⁸ **Staff recommends, in Reply Comments, PGE provide a description of the method that found 96 percent of multifamily housing participating in a PGE measure are underserved.**

Third, in addition to Staff's observation that PGE has not provided a net assessment of PM_{2.5} emissions from TE, this is only one of several pollutants Staff tracks. Staff can

⁵ ZEV_address_level_202403.xlsx.

⁶ Staff Report at 8, (September 15, 2023).

⁷ Capacity Utilization CONF KA.xlsx.

⁸ 2025 PGE TE Plan Report at 26 (May 1, 2025).

collaborate with PGE on this. However, PGE needs to first fully respond to the template Idaho Power and Pacific Power have used, which Staff sent to PGE in PUC IRs 52, 63, and 66. That request contains the full list of pollutants from electricity generation that DEQ advised Staff are significant enough to monitor. In the current TE planning cycle for Pacific Power, Staff agreed to an extension until the September 30, 2025, final reporting deadline to DEQ for calendar year 2024 emissions. Staff can use that same date to mark the time by which PGE is reasonably expected to know the resource mix of an average kWh from PGE's system in 2024. **Staff recommends, in Reply Comments, that PGE use the template Staff sent in PUC IRs 52, 63, and 66 to provide the intensity on PGE's system in calendar year 2024 for the full list of pollutants in those requests.**

Conclusion

This concludes Staff's Comments on PGE's draft TE Plan for 2026-2028. After reviewing that Plan, Staff has four recommendations for the Company:

- 1. Adjust the TE Budget of ratepayer funds and benefit/cost analysis to reach a societal cost test benefit/cost ratio of 1.0 or greater, per Order No. 25-028.**
- 2. In Reply Comments, provide the income distribution of new low-income qualifying Schedule 8 participants in 2024.**
- 3. In Reply Comments, provide a description of the method that found 96 percent of multifamily housing participating in a PGE measure are underserved.**
- 4. In Reply Comments, use the template Staff sent in PUC IRs 52, 63, and 66 to provide the intensity on PGE's system in calendar year 2024 for the full list of pollutants in those requests.**

Dated at Salem, Oregon, this 19th of September, 2025.

Eric Shierman

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CERTIFICATE OF SERVICE

UM 2033

I certify that this day I served the foregoing document upon all the following parties or attorneys of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid or by electronic mail pursuant to OAR 860-001-0180 (which may include a link to a secure shared file service).

Dated this 19th day of September 2025 at Salem, Oregon.

/s/ Emily Dolph

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