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November 5, 2021

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97308-1088

Re: Docket No. UM 2165 – Investigation of TE Investment Framework

Attached for electronic filing in the above-referenced matter, please find comments on behalf of ChargePoint, Inc. in response to the Investigation of Transportation Electrification Investment Framework Workshop held on October 20, 2021, and Commission Staff's draft interim guidance for implementing HB 2165.

Please let me know if you have any questions.

Respectfully,

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Matthew Deal
Manager, Utility Policy
ChargePoint, Inc.

cc: Eric Shierman (Senior Utility Analyst) and Sarah Hall (Program Manager), Program Development & Resources, Energy Resources & Planning

Docket No. UM 2165

Comments by ChargePoint, Inc.

I. Introduction

ChargePoint, Inc. (ChargePoint) submits these comments to the Oregon Public Utilities Commission (Commission) regarding the Investigation of Transportation Electrification (TE) Investment Framework workshop held on October 20, 2021, and Commission Staff's (Staff) draft interim guidance for implementing HB 2165.

ChargePoint appreciates the Staff's efforts in providing this venue for stakeholders to participate in discussions surrounding utility TE Investments in Oregon and the opportunity to provide these comments. As a participant in developing utility electric vehicle (EV) programs in many jurisdictions, ChargePoint believes that stakeholder discussions are an important part of the process and help to develop robust TE investment frameworks. ChargePoint respectfully offers these comments intended to strengthen the process surrounding TE investments in Oregon, encourage greater adoption of EVs and ensure a healthy and competitive market for EV charging services in Oregon.

In summary, our comments are as follows:

- ChargePoint supports Staff's proposals regarding the format, contents, and timing of the monthly meter surcharge budget.
- ChargePoint generally supports Staff's proposals for the monthly meter surcharge compliance filings but recommends that the timing of the compliance filings be developed to ensure that all expenses associated with the previous calendar year are contained within the filing.
- ChargePoint supports Staff's proposal to include review of the monthly meter surcharge budgets within the greater TE plan filings after 2022.
- ChargePoint supports Staff's draft definition of underserved communities and believes Staff's proposals provide a structure to ensure that representatives of underserved communities are included in the stakeholder process.
- ChargePoint supports Option 2 for the proposed pathways to integrate HB 2165 with the TE plans as this option would provide greater efficiency and clarity to the utilities and stakeholders prior to the 2022 TE plan filings.

II. Comments Regarding the October 20th Workshop

With respect to Staff's draft interim guidance for implementing HB 2165 as discussed at the October 20th workshop and filed in Docket No. UM 2165 on October 29, 2021, ChargePoint offers the following comments:

Monthly Meter Surcharge

ChargePoint supports Staff's proposal for the utilities to file a surcharge budget for the calendar year that details the monthly meter surcharge expenditures to be funded by the surcharge revenue, and for the budget to be reflective of programs in an accepted TE plan. Additionally,

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ChargePoint supports Staff's proposals detailing the information to be included in the budget filings (e.g., expenditures, revenue, and forecasted spending on underserved communities); and generally supports Staff's proposal for annual compliance filings, but agrees with Pacific Power that the timing of the compliance filings should be developed to ensure that all expenses associated with the previous calendar year are contained within the filing.¹ Finally, ChargePoint supports Staff's proposal to include review of the monthly meter surcharge budgets within the greater TE plan filings after 2022.

Underserved Communities

Staff has presented draft definitions for what would constitute an "underserved community" and proposes that spending on underserved communities can be direct expenditures on individual members of an underserved community or expenditures for publicly available investments in a geographic location, with a process for members of those communities to vet how the geographic designations are defined. ChargePoint supports these proposals and believes that they provide a structure to ensure that representatives of underserved communities are included in the stakeholder process.

Implementation Pathways for TE Plan Filings and Rulemaking

Staff has presented two options to integrate HB 2165 with the TE plan process, and requested stakeholders provide feedback regarding which option they prefer. ChargePoint supports Option 2, which would begin with the rulemaking process and delay the filing of the 2022 TE plan until after the rulemaking process is completed in Q2 2022. ChargePoint believes that Option 2 would provide greater efficiency and clarity regarding the TE plan process prior to the 2022 filings, as opposed to Option 1, which would instead proceed with the filing and review of the 2022 TE plans as currently scheduled before commencing the rulemaking process.

III. Conclusion

ChargePoint appreciates Staff's efforts to develop the Draft Interim Guidance for the implementation of HB 2165, and the opportunity to provide these comments. We look forward to continuing to work with the Commission, utilities, and other stakeholders to develop a clear and transparent process for utility TE investments and help achieve Oregon's energy, environmental, transportation, and economic development goals by reducing barriers to sustainable and scalable growth in the competitive EV charging market.

¹ See Pacific Power's November 2, 2021, Comments filed in Docket No. UM 2165.

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Respectfully submitted,

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