

**To: PUC staff hosting and those others participating in the Docket UM 2165**

**Re: “Investigation of Transportation Electrification Investment Framework”**

*From: Bob Clark, PGE rate payer*

*August 8, 2021*

***Comments regarding Bob Jenks, Citizen Utility Board, presentation on July 28, 2021 PUC EV workshop.***

**There two points I make:**

**(1)** Despite the directive to the PUC pertaining to HB 2165 and the Governor’s Executive Order 20-04, the Oregon PUC, and the electric utilities it regulates should have a moral, if not fiduciary responsibility, to warn those customers entering into a home electric vehicle charging program using level 2 electric charging. Specifically about level 2 limitations:

Level 2 Electric Charging is very limited in its practicality as it faces time limits, such as requiring one hour of charging to go no more than 30 miles or so in travel range. This is not anywhere near comparable to the 300 plus mile range available by filling one’s car tank with gasoline at the local gasoline station.

**(2)** Executive Director Jenks raises the possibility of crediting Electric Vehicle charging programs with the decrease in per customer fixed cost allocation, citing the decoupling arrangement provided utilities for energy efficiency programs.

**I do not think electric vehicle charging programs should be viewed in the same conservation lens as energy efficiency programs.** The former are thought to increase electricity demand, and therefore are not befitting of the conservation lens. In fact, level 2 charging for plug-in hybrid vehicles may not have much impact on reducing gasoline consumption and therefore carbon emissions. It is most likely human behavior will fall back to fueling plug-in hybrids mostly with gasoline. Then too, there is some research indicating it takes several years/miles of driving before there is a net gain from all-electric vehicles in reducing carbon emissions, as the manufacture of electric vehicles versus conventional gasoline fueled vehicles is thought to be more energy intensive.

I therefore believe **all rate payers should see a decline in their fixed cost allocation if electric vehicles materially increase electricity demand** on the unused capacity of existing utility distribution lines.

Sincerely,

Bob Clark

Milwaukie, Oregon

PGE customer