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September 10, 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 August 27, 2021.

Please let me know if you have any questions.

Respectfully,

Matthew Deal
Manager, Utility Policy
ChargePoint, Inc.

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

I. Introduction

ChargePoint, Inc. (ChargePoint) submits these comments to the Public Utilities Commission of Oregon (Commission) regarding the Investigation of Transportation Electrification (TE) Investment Framework workshop held on August 27, 2021.

ChargePoint appreciates the Commission'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 believes the primary objective of the TE Investment Framework should be the development of a clear and transparent process in which the utilities seek Commission approval for programs to support the increased deployment of TE infrastructure throughout their service territories. This process should enable stakeholders the opportunity to participate and provide meaningful input to help shape utility programs on an ongoing basis
- ChargePoint recommends the Transportation Electrification Plan (TEP) process be the main vehicle for utilities to seek Commission approval of TE programs and associated budgets, including the soon to be implemented monthly meter surcharge. Any program modifications or approvals sought outside of the formal TEP process should be conducted through a formal application process and provide all parties an opportunity to comment on the proposals.
- ChargePoint recommends that, regardless of the vehicle in which the program is submitted for approval, individual program requirements (e.g., program design, technological requirements, etc.), including those related to the new TE surcharge, be filed, and comprehensively reviewed during the initial approval process.

II. About ChargePoint

ChargePoint is a world leading electric vehicle charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases

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including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

III. August 27th Workshop Discussion

The August 27th workshop discussion focused on the implementation of new Oregon Legislation, HB 2165 and HB 3055. HB 3055, effective September 25, 2021, will create a new category of TE investment related to "infrastructure measures" with separate criteria for the Commission to consider for cost recovery of the investments. This category includes investments in distribution infrastructure that support TE, behind-the-meter infrastructure that supports TE (utility or customer-owned), and communication and control technologies that support TE.

HB 2165, effective January 1, 2022, includes a new monthly meter surcharge which will enable utilities to collect one quarter of one percent of the total revenue from all retail electricity customers. Surcharge revenue is to be expended on the support and integration of the utility's TEP in its service territory. Each utility will be required to file a tariff with an effective date of January 1, 2022, outlining the terms of the new surcharge, and file a budget outlining the planned expenditures of the surcharge revenue for Commission approval. Additionally, utilities will be required to develop a procedure for reporting the revenues and expenditures from the surcharge. Finally, the utilities will be required to make a reasonable effort to spend at least fifty percent of the revenue collected from the surcharge in underserved communities.

IV. Comments Regarding the August 27th Workshop

With respect to the discussion questions outlined in the August 27th workshop, ChargePoint offers the following comments:

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1. What are your priorities, and how would you approach implementation of these bills?

ChargePoint believes that the primary objective should be the development of a clear and transparent process in which the utilities seek Commission approval for programs to support the increased deployment of TE infrastructure throughout their service territories. This process should enable stakeholders the opportunity to participate and provide meaningful input to help shape utility programs on an ongoing basis. To that effect, ChargePoint recommends the TEP process be the main vehicle for utilities to seek Commission approval of specific TE programs, including programmatic requirements, and associated budgets, including the soon to be implemented surcharge. Thus, the TEP process would function similarly to TEP processes in New Mexico and Colorado.¹ Additionally, any program modifications or approvals sought outside of the formal TEP process should be conducted through a formal application process and provide all parties an opportunity to comment on the proposals. ChargePoint notes that as the TEP process in Oregon is relatively new, we anticipate the process will evolve over time. ChargePoint further notes that this would be somewhat of a departure from prior dockets, as the Commission has historically focused on high-level policy issues in the TE plan dockets and considered specific TE programs in TE program application dockets. However, considering specific programmatic requirements and other program details in the TE planning dockets is consistent with the Commission's recent approval of Pacific Power's TE pilot program application in Docket No. ADV 1288 and appropriate to consider now in light of HB 2165. ChargePoint supports such a process provided that utilities are required to seek approval for any programmatic changes they seek to make between TEP dockets in a separate application.

Finally, ChargePoint recommends that regardless of whether utilities submit programs for approval in TEP proceedings or in separate program application dockets, individual program requirements (e.g., program design, customer eligibility, technological requirements, etc.), including those related to the new TE surcharge, should be filed and comprehensively reviewed during the initial approval process with sufficient opportunities for stakeholder input prior to program implementation.

2. HB 2165 Section 2 (6) specifies that 50% of funds support TE in underserved communities

- a. What does "underserved" mean in this context and why?

ChargePoint notes that HB 2165 provides a basis for what may constitute an "underserved" community. Specifically, the legislation states that underserved communities may include, but is not limited to, residents of rental or multifamily housing, communities of color, low income communities, tribal communities, rural communities, coastal communities, frontier communities, and other communities adversely harmed by environmental or health hazards.

¹ Colorado's transportation electrification statute appears at CRS § 40-5-107. New Mexico's transportation electrification statute appears at NMSA § 68-8-12.

- b. How do utilities and stakeholders think this process should be developed and how should metrics be developed to demonstrate program effectiveness?

ChargePoint believes it would be efficient to include this process within the TEP proceedings, which should include program budget development and approval. The budgets will guide how the utility invests the revenue collected through the surcharge; utilities can work collaboratively with Commission staff and stakeholders to determine which investments will provide the greatest benefit to ratepayers in underserved communities and build those investments into the proposed budgets.

- c. Who should be at the table to guide utility selections to invest in TE for underserved communities, and in what forums? How should the Commission help this process?

ChargePoint believes that this should be included as a part of the greater budget development and approval process for the surcharge. The Commission could facilitate a stakeholder process in whichever forum the budget is submitted for approval, to allow for further discussion that would ultimately inform the development of the surcharge budget, prior to its submission for Commission review. It will be important to ensure that representatives of underserved communities are included in the stakeholder process.

- 3. What are the implications of developing a framework to evaluate TE expenditures with respect to infrastructure measures, and non-infrastructure measures?

ChargePoint believes that with the separation of TE investments into the distinct categories of “infrastructure measures” and “non-infrastructure measures,” HB 3055 will create separate frameworks and criteria for the Commission to operate under while evaluating whether a utility should be able to recover costs related to TE investments, depending on which category the investment falls into. The implications of these changes are that the separate TE investment categories and associated criteria will need to be considered while a utility is developing a TE program, or considering other TE investments, and when the Commission determines whether the investments are eligible for cost recovery. Non-infrastructure measures such as education and outreach are critical to the success of TE programs.

V. Conclusion

ChargePoint appreciates 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.