

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2165

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation of Transportation
Electrification Investment Framework

Comments of the NW Energy Coalition
on the First Public Workshop

The NW Energy Coalition (NWECC) appreciates the opportunity to provide comments on the initial Transportation Electrification Investment Framework workshop and overall process.

EO 20-04 directs the Public Utility Commission of Oregon (PUC) to encourage investments in transportation electrification and in response the PUC committed to establishing the foundations of a new framework plan for utilities and stakeholders to guide future transportation electrification investments.¹² NWECC supported opening a process to develop a new regulatory framework given that meaningfully scaling utility transportation electrification (TE) program portfolios has proven difficult with multiple program filings reduced to pilots.³

A new method for evaluating utility TE programs is necessary to affordably and equitably serve customers and meet the directives of EO 20-04. In developing a new transportation electrification investment framework, NWECC offers direct responses to the questions outlined in the agenda for the first workshop.⁴

¹ Section 5.B (2) of EO 20-04 directs the Public Utility Commission of Oregon (PUC) to encourage electric companies to support transportation electrification infrastructure that supports GHG reductions, helps achieve the transportation electrification goals set forth in Senate Bill 1044 (2019), and is reasonably expected to result in long-term benefits to customers.

² [Oregon Public Utility Commission Executive Order 20-04 Work Plans, 2020](#)

³ [NWECC Comments regarding Oregon Public Utility Commission Staff Proposed EO 20-04 Work Plans \(draft 9-22\), 2020](#)

⁴ [Docket No. UM 2165 – Transportation Electrification Investment Framework, Agenda for First Public Workshop](#)

Responses to Questions for Stakeholders to Consider at the Workshop

1. What are the most important policy or regulatory barriers for this workshop process to address?

NWEC has over a decade of experience participating in dockets concerning transportation electrification, including UM 1810, UM 1811, UM 1826, AR 599, AR 609, UE 386, UM 2033, and UM 2056. We've observed significant barriers to adequately scaling utility investments in transportation electrification. Since most programs have been proposed on an individual basis and the total budget for programs has been reduced more than once, it appears as though **the largest barrier to TE investments that would help achieve the directives outlined in Section 5.B (2) of EO 20-04 is the use of traditional energy efficiency cost effectiveness tests on an individual program basis.**

Senate Bill 1547 (2016), ORDER NO. 19-134, and the recently signed House Bill 2165 (2021) do not require the use of traditional energy efficiency cost-effectiveness tests yet slightly modified Ratepayer Impact Measurement (RIM) test are being applied on an individual program basis.⁵ This has significantly limited the implementation of programs that would benefit a diverse set of customers.

This workshop process should further evaluate this barrier and develop solutions with stakeholders that can be integrated into the TE Investment Framework.

2. How do we ensure this workshop process is inclusive of impacted communities as described in EO 20-04? These communities include Native American tribes, communities of color, rural communities, coastal communities, lower-income households, and other communities traditionally underrepresented in public processes and underserved in transportation electrification.

Procedural equity is an important component to creating more equitable outcomes and we encourage consideration of the Initiative for Energy Justice's Justice in 100 Scorecard, particularly pages 18-22.⁶ We also recognize that developing these processes is a work in progress and the capacity to engage of impacted community members can be limited. In the absence of direct engagement from impacted communities, we encourage the PUC to leverage other processes where feedback from impacted communities may be relevant and to identify existing resources. Identifying relevant processes and existing resources may be a useful exercise for the second workshop.

⁵ [Docket No. AR 609 – Rulemaking Regarding Transportation Electrification Plans, ORDER NO. 19-134](#)

⁶ [Justice in 100 Scorecard, Initiative for Energy Justice, 2021](#)

3. What do you see as the most important policy or regulatory challenges for the PUC to address in the TE decision-making framework?

Instead of using the examples provided in this question to prioritize one item over another, we recommend the PUC use this list as a starting place to work with stakeholders to develop metrics to evaluate TE portfolios and a list of universal targets that each program portfolio is designed to achieve.

For example, one metric could be the percent of residential customer EV load shifted to off peak periods and one universal target could be the number of transit agencies electrified. Each utility would then set a target number of transit agencies that their TE portfolio would need to electrify.

4. What key gaps or opportunities do you see in the current regulatory “tools”? Which customer groups are impacted by these specific issues or policies?

Assessing transportation electrification programs on a portfolio basis offers the opportunity to allow for broader consideration of programs and help provide customers with multiple options for services, designed to serve a range of customer types and target multiple market segments.

It is likely that low-income customers are receiving a lower proportion of direct benefits from current utility investments in transportation electrification. In this context, direct benefits could be indicated by a low-income customer or an entity directly serving low-income customers participating in a utility program and it resulting in cost savings, access to electric transportation technology, and/or an increase in reliable and affordable mobility due to utility TE investments and indirect benefits could be indicated by low-income customers experiencing better air quality due to avoided GHG pollution and/or downward pressure on rates associated with utility TE investments. We encourage utilities to provide data detailing the customer groups who have participated in current TE programs and the associated benefits that accrued to the customer from program participation.

5. How do you think the Commission should best ensure access and equitable allocation of costs and benefits of transportation electrification to all Oregonians?

A detailed list of the various costs and benefits of transportation electrification to various customer classes may be beneficial to further explore this question.

Respectfully submitted,

A handwritten signature in black ink that reads "Annabel L. Drayton". The signature is written in a cursive style with a long horizontal stroke at the end.

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Date Signed: June 9, 2021