



ChargePoint, Inc.
254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

September 29, 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 September 15, 2021.

Please let me know if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Matthew Deal".

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 September 15, 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 that the Commission and utilities should prioritize: 1) make-ready infrastructure investments, 2) investment in underserved areas, and 3) further development of alternatives to traditional demand-based rates.
- Utility TE investment strategies should be collaboratively developed by representatives of underserved communities, Commission staff, utility representatives, members of other Oregon agencies (e.g., the ODOT and DEQ), and other interested stakeholders, including EV hardware and network service providers.
- ChargePoint believes it would be efficient to include progress reporting within the TEP proceedings.
- Increased community participation in planning efforts would give voice to community members who can help properly identify their unique community needs, so that investment can be targeted more effectively, and benefits of these programs can be allocated more equitably.

II. Comments Regarding the September 15th Workshop

With respect to the discussion questions outlined in the September 15th workshop, ChargePoint offers the following comments:

1. What kinds of TE investments are most needed and why?

Make-ready infrastructure: Generally speaking, make-ready infrastructure includes all the electrical and construction work on the utility side of the electric meter (front-of-meter) and the customer side of the meter (behind-the-meter) to make a site ready to connect EV charging equipment (e.g., wiring, transformers or transformer upgrades, utility service meters for the charging stations, new electric service panels, line extensions, etc.). The cost of make-ready infrastructure is often one of the largest cost categories of installing and hosting EV charging

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station. Utility investment, either through utility ownership, or incentives/rebates, in make-ready infrastructure reduces costs, can streamline the installation process of EV charging equipment for site hosts¹, and supports the existing competitive market for EV charging station hardware and network services. Investment in make-ready infrastructure, and ideally standard make-ready tariffs, would effectively spur private investment in EV charging infrastructure while reducing costs to ratepayers by requiring site hosts to be responsible for the cost of the EV charging equipment itself.

ChargePoint has supported Portland General Electric (PGE) efforts to reduce the cost of make-ready infrastructure for ratepayers through utility tariffs and make-ready incentive programs.² Additionally, utility investments in make-ready infrastructure supports the legislative efforts outlined in Oregon House Bill 2165, which specifically allows cost recovery for prudent investment in infrastructure measures, including distribution system infrastructure and behind the meter infrastructure that supports transportation electrification, and states “Widespread transportation electrification should stimulate innovation and competition, provide consumers with increased options in the use of charging equipment and in procuring services from suppliers of electricity, attract private capital investments and create high quality jobs in this state.”³ Utility investment in make-ready will reduce the cost of EV infrastructure for customers, allow utilities to generate additional kWh sales through increased charging station deployment, encourage EV adoption, and stimulate competition by leveraging the competitive market for EV charging hardware and services, allowing customers to choose the charging equipment and network services that best fit their needs.

Underserved Communities: Investment in traditionally underserved communities where private investment may not occur; this could include increased rebates for EV infrastructure and supply equipment to businesses or other entities in underserved communities, which in Oregon may include coastal areas, rural parts of the state, and multifamily and low-income communities in urban areas. Spurring development of the competitive market through make-ready programs and increasing access to EV charging in underserved communities by providing additional funding, utilities can contribute to the development of the EV charging market while retaining market competition and reduce the barriers to EV adoption for Oregon residents. Pairing investments in utility side make-ready infrastructure with greater investment in underserved communities (including charging stations) has been supported in other jurisdictions.⁴

Demand Charge Alternatives: Further development of alternatives to traditional demand-

¹ The term “site host” refers to the owner or lessor of the property on which an EV charging station is located. Site hosts include residential customers; owners of multifamily housing units (MFH); commercial customers that offer charging to the public, their customers, and/or their employees; fleet owners; and government entities.

² See PGE’s Fleet Electrification Make-Ready Pilot and efforts in Advice No. 20-17 to establish a Transportation Electrification Line Extension Allowance as part of PGE’s Schedule 300.

³ See Section 4 of Oregon House Bill 2165.

⁴ See the Decision Setting Near-Term Priorities for Transportation Electrification Investments by the Electrical Corporations, issued on July 21, 2021, in Public Utilities Commission of California Rulemaking No. 18-12-006.

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based rates, such as Pacific Power's General Service TOU Rate (Schedule 29),⁵ will be important to spur the deployment of EV charging stations. Traditional, demand charges present a significant barrier to deploying high demand draw EV charging stations, such as DCFC stations. This can create significant economic barriers for owners and operators of DCFC stations, often resulting from a few peak charging sessions that can occur each month, effectively penalizing site hosts and station owner-operators for utilizing their stations. This is also true for fleet operators, including medium-and heavy-duty vehicles, which will be essential to reduce deleterious emissions from the transportation sector. Addressing these operating cost barriers will be essential to ensure widespread and equitable access to the benefits of transportation electrification in Oregon.

2. How should utilities prioritize these investments over time?

ChargePoint believes that the Commission and utilities should prioritize TE investments in the categories outlined in our response to question 1.

3. Who should help guide utility TE investments in underserved communities?

ChargePoint reiterates its comments in response to the August 27, 2021, workshop. We believe that the Commission should facilitate a stakeholder process to allow for further discussions that would ultimately inform the development of the budget for utility TE investments, including those in underserved communities. Representatives of underserved communities should have a significant involvement in the stakeholder process, as well as Commission staff, utility representatives, and other interested stakeholders, such as EV hardware and network service providers like ChargePoint. The investment strategy should be collaboratively developed between those parties by identifying the unique issues related to EV adoption in each community and developing a plan to address those issues driven by collaborative discussion between the stakeholders.

4. How should utilities measure and report progress on these investments to the OPUC and stakeholders?

ChargePoint believes it would be efficient to include any progress reporting within the TEP proceedings, which should also include program budget development and approval for revenue from the surcharge that will be expended in underserved communities. Additionally, ChargePoint believes that utilities should provide regular reporting to the Oregon Legislature regarding TE investments in the state.

5. How can utilities build on their experience in TE planning to increase the equity of investments for more Oregonians?

Utilities can include an analysis of which areas of their service territory are not experiencing

⁵ See Docket No. UE 374.

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sufficient investment in EV charging infrastructure and target programs (e.g., rebates, make-ready, etc.) to those segments. Additionally, the utilities can utilize information collected through their current pilot programs, and work with other market participants, to determine which investments have had the greatest impact on creating equity, while minimizing cost to ratepayers by spurring private investment, and building on those investments.

6. Are there community needs not currently considered?

Although the utilities in Oregon are now beginning to address other charging needs, Oregon utilities have to date primarily focused on fast charging programs. ChargePoint believes that other charging needs, such as residential charging (including both single-family and multi-unit dwellings (MUD)) and workplaces, still need to be further addressed. Additionally, the utilities should further address the needs of fleet providers, including faster grid interconnections and utility side infrastructure to support EV fleets. ChargePoint is encouraged that PGE has begun work to support fleet charging in the Portland area with its “electric island.”⁶ Fleet charging is quickly becoming an important segment of EV charging and utilities should develop programs to address these needs across the state.

7. How can increased community participation in planning reflect these needs, to ensure equitable allocation of costs and benefits?

Increased community participation in planning efforts can help utilities identify the EV charging needs of communities within their respective service territories, and better direct utility investment in EV charging infrastructure towards addressing those needs. For example, a community that has a large population which do not have access to residential charging may require additional utility investment in MUD or workplace charging. Building community participation into the planning process can help utilities properly identify the needs of a community and direct EV charging investments to maximize the benefits to the community.

III. 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.

⁶ <https://portlandgeneral.com/news/2021-04-21-daimler-portland-general-electric-open-electric-charging-site>