

**From:** [SHIERMAN Eric \\* PUC](#)  
**To:** [PUC.PUC.FilingCenter \\* PUC](#)  
**Subject:** FW: UM 2165 - Workshop 3 and Additional Recommendations  
**Date:** Thursday, August 12, 2021 8:05:42 AM

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Please post this to the UM 2165 docket.

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**From:** Annabel Drayton <annabel@nwenergy.org>  
**Sent:** Wednesday, August 11, 2021 5:00 PM  
**To:** HALL Sarah \* PUC <Sarah.L.Hall@puc.oregon.gov>; SHIERMAN Eric \* PUC <Eric.SHIERMAN@puc.oregon.gov>  
**Cc:** Lauren McCloy <Lauren@nwenergy.org>  
**Subject:** UM 2165 - Workshop 3 and Additional Recommendations

Hi Sarah and Eric,

I wanted to follow up to workshop #3 by responding to some of the questions and providing some additional recommendations. I'm sharing this feedback via email as NWECC feels it's important to continue engaging but wanted to note that the two-week comment cycle can be burdensome for stakeholders. One thing you could consider for these smaller rounds of questions is allowing for some time at the beginning of each workshop for stakeholders to provide comments, responding to questions posed at the previous workshop. This way stakeholders could have multiple options for providing input.

Response to questions:

- How would you characterize the manner in which the PUC currently reviews transportation electrification (TE) investments, and what are its strengths and weaknesses?
  - OAR 860-087-0020 provides guidance on the development of utility TE Plans but does not provide guidance on how utility TE program portfolios should be designed. The TE investment framework should focus on TE program portfolio design and the PUC should modify OAR 860-087-0020 to incorporate relevant changes as necessary.
  - Additionally, through work in Washington and Oregon, NWECC recognizes that TE Plans serve a specific role in the utility TE investment process and that new TE Plans every two years may not be necessary to achieve Oregon's equity and climate goals. In fact, the two year schedule may take time and resources away from developing essential customer side programs. We recommend the PUC look at the Washington Utilities and Transportation Commission's TE Plan process. The Washington IOU TE Plans follow a 5-year schedule with three interim reports. A comprehensive mid-period report will cover updated adoption figures and forecasts, lessons learned, and updated program activities. Brief year-end reports that outline high-level program activities, expenses, and revenue will be filed

between the TE Plan filing and the mid-period report and again between the mid-period report and an updated TE Plan after 5 years. Puget Sound Energy's filed TE Plan ([UE - 210191](#)) follows this schedule as does Avista's acknowledged TE Plan ([UE - 200607](#)).

- While there appears to be strong interest in improving the review process, what are your specific recommendations for improvements?
  - It does not appear as though the review process is flawed. Instead, the issue seems to be the lack of guidance on how TE program portfolios should be designed. The TE Investment Framework should outline how TE program portfolios should be designed in order to be approved by the Commission.
  - However, it may be helpful for the Commission to host a webinar to inform stakeholders of the review process for all customer side programs.
- Should some aspects of the current process be preserved?
  - Yes, see above comments.
- Can you provide examples from other states to support your recommendations?
  - Yes, see above comments.

Additional recommendations:

NWEC recommends the following for consideration in the design of future workshops:

- Workshop 6 (Equity) -
  - It's important that the TE investment framework be designed to prioritize equitable outcomes from utility TE program portfolios. We support leading with equity and acknowledge that this workshop will come before many important questions about the design of the TE investment framework are addressed. To ensure this workshop helps move the UM 2165 process towards meaningful recommendations by the end of the year, we recommend assuming that TE programs will be evaluated on a portfolio basis for this conversation and that the PUC seek input from stakeholders on how to integrate equity and track its performance within TE program portfolios.
  - Additionally, it may be helpful to present on examples from Colorado, California, and other states.
- Workshop 7 (Proposed topic: determining TE program portfolio budgets) -
  - This is an essential issue to address. We recommend developing a workshop agenda that works towards addressing this topic with the PUC's consultant, RAP. Developing an example portfolio and comparing different methods for determining total budgets as well as what the potential rate/bill impacts could be, may be a helpful exercise.
- Workshop 8 (Proposed topic: allocating portions of the TE portfolio to

different program areas) -

- If programs are to be designed and evaluated on a portfolio basis, guidelines for allocating portions of the TE portfolio to different program areas will be essential to streamline program approval and create clear expectations for utilities and stakeholders.

Lastly, we recommend the PUC put together a master TE service list so when a new TE pilot, program, plan, or other item related to TE is filed, interested stakeholders can be notified.

Please feel free to add this email to the UM 2165 record.

Thank you,  
Annabel

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