



Portland General Electric Company

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Brendan J. McCarthy

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March 18, 2025

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: **UM 2033 - Transportation Electrification Plan**

Dear Filing Center:

Attached for filing is Portland General Electric Company's Application Requesting a Waiver of the Deadline to File 2026-2028 Transportation Electrification Plan in the above listed matter.

Sincerely,

A handwritten signature in blue ink that reads "Brendan J. McCarthy".

Brendan J. McCarthy
Assistant General Counsel III

BJM:mmb

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2033**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Transportation Electrification Plan

**PGE’S APPLICATION REQUESTING
A WAIVER OF THE DEADLINE TO
FILE 2026-2028 TRANSPORTATION
ELECTRIFICATION PLAN**

I. INTRODUCTION

Pursuant to OAR 860-087-0001 (2), Portland General Electric Company (PGE) hereby submits to the Commission this request for a partial waiver of OAR 860-087-0020 on the terms specified in this Application. Specifically, PGE respectfully requests a waiver of the provision in subsection (2)(b) requiring the filing of draft plans for review and comment on or before May 1. If the rule is waived, PGE would request that it is allowed to file its draft 2026-2028 Transportation Electrification (TE) Plan no later than July 1, 2025.

II. STANDARD

PGE’s draft 2026-2028 TE Plan is required to be filed on or before May 1, 2025.¹ Public Utility Commission of Oregon (OPUC or Commission) rules provide that the Commission may waive any rules in Division 87 for good cause shown on its own motion, or upon request, and that any request for a waiver of the rules must be made in writing.²

¹ OAR 860-087-0020(2)(b).

² OAR 860-087-0001(2).

III. BACKGROUND

PGE suggests that three major categories of changes have disrupted the landscape within which PGE’s transportation electrification team had been conducting its planning, work, and creation of its draft 2026-2028 TE Plan. These changes necessitate that the team spend unanticipated time in analyzing the impact on the draft TE Plan. And further, these changes satisfy the “good cause shown” requirement of OAR 860-087-0001(2).

First, as PGE has pursued planning efforts for the 2026-2028 TEP, we have observed that TE market conditions are diverging significantly from expectations in the prior planning cycle. In particular, data from the Oregon Departments of Transportation and Environmental Quality show that EV adoption rates in Oregon are lagging below the reference case from the 2023-2025 TEP and in fact are closer to the low range of projected adoption. This information was incorporated into PGE’s recently filed Distribution System Plan,³ which in turn will inform PGE’s upcoming TEP as directed in Staff’s recently updated utility TE planning guidance in UM 2165. And PGE needs to integrate these changes into the TEP.

Second, since January 20, 2025, the new Federal administration, through executive orders and policy direction, has disrupted the TE market, withdrawn federal grants and subsidies that were to be used for TE infrastructure, and injected uncertainty into the policy sphere for electric vehicles and TE. These changes were unanticipated in scope and detail. These federal changes will continue to impact customers’ behavior and the already-changing dynamics of the EV market seen in 2024, throughout the current TEP planning and implementation cycle of 2026 through 2028.

³ *In the Matter of Portland General Electric Company, Distribution System Plan*, UM 2197. 2024 Distribution System Plan filed December 18, 2024.

Specifically, the President signed an order to terminate state emissions waivers that function to limit sales of gasoline-powered automobiles; consider the elimination of subsidies that favor EVs; revoke the Biden Administration’s executive order that had declared a goal that 50% of all new passenger cars and light trucks sold by 2030 would be zero-emissions vehicles; and “paused” disbursements of funds appropriated through the Inflation Reduction Act of 2022 and the Infrastructure Investment and Jobs Act of 2022 for electric vehicle charging stations made available through the National Electric Vehicle Infrastructure Formula Program (NEVI) and the Charging and Fueling Infrastructure Discretionary Grant Program.

These and other changes require a reanalysis of the expectation for federal moneys and support for TE infrastructure in Oregon, the extent to which these abrupt changes to federal policies may affect customer EV adoption, and the impact these changes may have on market barriers that PGE can potentially help address through its TE Plan,⁴ including support for underserved community adoption of TE and access to charging.

Third, the Commission recently gave explicit direction to PGE in UE 435, Order No. 24-454, to provide additional detail and support for the full range of PGE’s TE-related costs and expenditures in its TE Plan. This includes costs stemming from base business activities as well as PGE’s own fleet electrification efforts where those efforts are justified in part by customer and public policy benefits.⁵ This order was issued at the end of December 2024 and PGE is integrating its direction into its TE planning. The Commission stated, specifically:

⁴ OAR 860-087-0020(3) requires that TE Plans include, among other things, discussion of market barriers that the TE plan can address, emerging challenges to TE, and an estimate of the current condition of the TE market in PGE’s service territory.

⁵ *In the Matter of Portland General Electric Company, Request for a General Rate Revision*, UE 435, OPUC Order No. 24-454.

To be clear, however, going forward, we expect utilities to include in their TE Plan and budget all TE-related costs, including costs associated with what PGE describes as “base business activities that support overall development and administration of the TE Plan” or that support any TE-related work and investments, even if not attributable to specific programs or measures as part of the plan, as well as O&M on such investments. To make a determination regarding the cost-effectiveness of a utility’s TE program, we must have complete data regarding the program’s costs.⁶

And

While as a general matter utilities are not required to include their own fleet electrification efforts in their TE Plans and budgets, we note that in this case, PGE’s justification for its fleet electrification rests in part on the benefits that its experience with its own fleet electrification will bring to its customer-facing TE activities. To the degree that PGE relies on this justification for premium costs related to its EV charger investment they should be included in its next TE Plan and budget so that we can consider the cost-effectiveness of PGE’s TE program holistically.⁷

The Commission recognized that it had not previously made a determination on these issues, and that this direction would therefore require a change to PGE’s practice from the prior TE Plan. As a result, PGE needs additional time to prepare and revise its next TE Plan and Budget to follow the Commission’s guidance, make a determination regarding treatment of PGE fleet investments, and incorporate costs which, prior to the end of December 2024, had not been expected to be included in the Plan. This reassessment has disrupted the process of the development of the TE Plan, but PGE believes that with a short delay to the filing date, PGE can meet the Commission’s expectations.

⁶ *Id.* at p. 90.

⁷ *Id.* at p. 94.

IV. Conclusion

OAR 860-087-0001(2) allows the Commission to grant waivers of Division 87 rules for good cause shown. PGE respectfully seeks this partial waiver to allow draft TE Plan filing no later than July 1, 2025, on the basis of three distinct categories of changes in the planning landscape all of which require reassessment, new analysis and redrafting of the TE Plan.

For all the reasons described above, PGE requests that the Commission approve this request for a partial waiver.

V. Communications

Communications regarding this application should be addressed to:

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DATED this 18th day of March, 2025.

Respectfully Submitted,



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