

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

Docket No. UE 374

In the Matter of

PACIFICORP d/b/a PACIFIC POWER  
COMPANY

) PETITION TO INTERVENE OF  
) TESLA, INC.  
)

Request for a General Rate Revision

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Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), Tesla, Inc. (Tesla) petitions the Public Utility Commission of Oregon (Commission) to intervene in this proceeding with full party status as described in OAR § 860-001-0010(7).

In support of this petition, Tesla represents as follows:

1. The business address of Tesla is:

Tesla, Inc.  
3500 Deer Creek Rd.  
Palo Alto, CA 94304

2. Tesla is represented in this proceeding by Kevin Auerbacher, who seeks admission *pro hac vice*, and John Dunbar.
3. Tesla requests that the following contacts also be served with all documents related to this proceeding (electronic service preferred):

Kevin Auerbacher  
Managing Counsel  
Tesla, Inc.  
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John Dunbar  
Dunbar Law LLC  
621 SW Morrison Street, Ste. 1025  
Portland, OR 97205  
Tel: (503) 505-9861  
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4. Tesla's mission is to accelerate the world's transition to sustainable energy. In the service of this mission Tesla has dedicated itself to electrifying transportation through the manufacture and sale of advanced electric vehicles as well as key clean energy technologies, including battery storage and solar photovoltaic systems. To date Tesla has sold over 800,000 electric vehicles worldwide, and has deployed over two gigawatt-hour (GWh) of energy storage and over three gigawatts (GW) of solar
5. The nature and extent of Tesla's interest in this proceeding is to provide comments on Pacific Power's proposal to introduce Schedule 29, which is a non-residential time-of-use pilot program for customers whose load is less than one megawatt (MW), which Pacific Power notes is designed in part to accommodate low-load factor customers such as direct current (DC) fast chargers. Pacific Power highlights the current challenges for building out DC fast charging including high energy costs and states that "other forms of transportation electrification could take advantage of proposed Schedule 29 such as bus charging or fleet charging where time of use rates could lower the incremental cost of off-peak charging and help the Company better manage around its peak periods."<sup>1</sup> As a manufacturer of EVs and

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<sup>1</sup> PAC/1400, Meredith/55-56.

provider of EV charging infrastructure for its customers, Tesla's business activities in PacificPower's service territory are directly impacted by the actions outlined for the proposed non-residential time-of-use pilot program. No other party can adequately represent Tesla's interests in this proceeding.

6. Tesla plans to raise the following issues in this proceeding:
  - a. Whether Pacific Power's proposed Schedule 29 is adequate, reasonable and should be accepted by the Commission.
7. Tesla brings a unique perspective and expertise to this proceeding given its knowledge as both a manufacturer of EVs and through the deployment of its charging infrastructure network. Tesla is an active participant in transportation electrification regulatory proceedings across the country and has previously engaged in dockets before the Commission.
8. Tesla's participation in this proceeding will not unreasonably broaden the issues, burden the record, or delay this proceeding.

For all the reasons stated above, Tesla respectfully requests that the Commission grant its petition to intervene in this proceeding.

Respectfully submitted on April 14, 2020.

/s/John J. Dunbar  
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