

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

Docket No. UM 2033

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

) PETITION TO INTERVENE OF
) TESLA, INC.
)

2019 Transportation Electrification Plan

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.

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 will not be represented by counsel in this proceeding. Francesca Wahl, Sr. Policy Advisor, Policy and Business Development at Tesla will be Tesla's authorized representative.

3. Tesla requests that the following contacts also be served with all documents related to this proceeding (electronic service preferred):

Francesca Wahl
Senior Policy Advisor
Tesla, Inc.
3500 Deer Creek Rd.
Palo Alto, CA 94304
Tel: 650-435-0422
E-mail: fwahl@tesla.com

Patrick Bean
Managing Policy Advisor
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1333 H Street NW, Suite 1100 West
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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 half a million 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 Portland General Electric's (PGE) transportation electrification plan, as permitted by OAR § 860-087-0020(2)(c). As a manufacturer of EVs and provider of EV charging infrastructure for its customers, Tesla's business activities in PGE's service territory are directly impacted by the actions outlined in PGE's transportation electrification plan. 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 the transportation electrification plan adequately helps to meet the state's greenhouse gas emissions reductions and EV goals;
 - b. Whether the actions outlined in the transportation electrification plan are adequate 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 November 4, 2019,

/s/Francesca Wahl
Francesca Wahl
Senior Policy Advisor
Tesla, Inc.
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