

Analysis

Background

The Company requests a waiver of the administrative rule to file its 2026-2028 TE Plan by no later than July 1, 2025, extending the filing deadline by up to two months.¹ PGE provides three reasons for the request:

1. Electric vehicle (EV) adoption rates are significantly lower than PGE forecast in the Company's last TE Plan.
2. Federal TE policy has changed, providing less subsidies and challenging California's alternative emissions standards.
3. Last year's rate case resulted in a Commission ruling that, to recover TE-related costs with a customer or public policy justification, the costs need to be included in the TE Plan. As a result, PGE must plan its fleet electrification from a TE program perspective if the Company intends to recover these costs from a broader perspective than a traditional prudence review.

PGE argues these developments last year "require reassessment, new analysis and redrafting of the TE Plan."²

As context, under the prior Division 87 TE planning rules, an electric company's filing deadline was two years after the Commission accepted the Company's prior TE Plan. The TE Plan PGE ultimately files this year will be the Company's third. The Commission granted two waivers that allowed PGE to delay filing its 2022 TE Plan twice.³

Staff Review

Staff concludes that one of PGE's justifications shows good cause for a delayed filing: the need for more detailed planning of the Company's electrification of its own fleet of motor vehicles, given the Commission's decision on TE-related cost recovery in Docket No. UE 435. The Commission ruled that:

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

¹ *In the Matter of Portland General Electric Company Transportation Electrification Plan*, Docket No. UM 2033, PGE's Application Requesting a Waiver of the Deadline to File 2026-2028 Transportation Electrification Plan at 1 (March 18, 2025).

² PGE Application at 5.

³ *In the Matter of Public Utility Commission of Oregon, Investigation of Transportation Electrification Investment Framework*, Docket No. UM 2165, Order No. 21-484 (December 27, 2021); *In the Matter of Portland General Electric Company Transportation Electrification Plan*, Docket No. UM 2033, Order No. 23-034 (February 8, 2023).

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.⁴

The Company may need more time for fleet electrification planning. At the beginning of Docket No. UE 435, PGE indicated that the Company had “no other additional research and/or planning workpapers or documents” beyond what was used to produce the Company’s September 2020 electrification plans.⁵ In PGE’s surrebuttal testimony, the Company revealed a new fleet electrification plan that had significantly scaled back the pace of procurement.⁶ Staff finds that the Company should be given the time it needs to perform a thorough analysis of EV procurement from a TE program perspective. The ultimate decision that PGE makes is reasonably expected to be material to the Company’s proposed TE Budget.

Staff finds PGE’s other two justifications for a rule waiver less compelling. Regarding the overestimation of EV adoption in the Company’s service territory, Staff has been on record since 2019 that PGE’s forecasting methodology has consistently overestimated EV adoption. The Company’s forecasting methods continue to be less accurate than the less complicated methods that Pacific Power and Idaho Power use.

Regarding the change in federal policy, while Staff notes that these changes in have been sweeping, the policy risk around mandates on manufacturers has always been an issue, even at the state level.⁷ Staff finds that the policy uncertainty at both the federal and state levels will not be resolved by July 1, 2025, and best estimates of the expected value of subsidies and mandates given the competing priorities policymakers will be acceptable for planning purposes as PGE will continue to face uncertainty for this work into the foreseeable future.

Conclusion

Staff recommends the Commission approve PGE’s motion requesting a waiver of the May 1st deadline under the Division 87 rules and require the Company to file its 2026-2028 TE Plan by no later than July 1, 2025. The magnitude of new planning around the

⁴ *In the Matter of Portland General Electric Company, Request for a General Rate Revision*, Docket No. UE 435, Order No. 24-454 at 94 (December 20, 2024) .

⁵ See Docket No. UE 435, PGE, Response to PUC DR 323, May 14, 2024. p 1.

⁶ See Docket No. UE 435, PGE, 2800, October 1, 2024, Powell – Clark Mead / 24, 25.

⁷ Jaquiss, Nigel. *Kotek Urges DEQ to Relax Advanced Clean Trucks Rules for Largest Vehicles* March 10, 2025. P 1.

electrification of PGE's own fleet of motor vehicles is a sufficient cause for the Commission to grant this waiver.

Before PGE files its TE Plan, Staff will present a procedural schedule to the docket. The procedural schedule will provide for a Commission decision on PGE's TE Plan and TE Budget before the end of this year.

PROPOSED COMMISSION MOTION:

Approve Portland General Electric's request to waive the May 1st Transportation Electrification Plan deadline and require the Company to file the Plan no later than July 1, 2025.