

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UE 374

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER)	PREHEARING STATEMENT OF
)	CHARGEPOINT, INC.
Request for a General Rate Revision)	

ChargePoint, Inc. (ChargePoint), through its undersigned counsel, hereby files its Prehearing Statement, which includes ChargePoint’s prehearing brief, list of active participants, cross examination statement, exhibit list, and list of hearing materials.

ChargePoint’s Prehearing Brief

The purpose of ChargePoint’s prehearing brief is to state ChargePoint’s support for the Partial Stipulation filed in this proceeding on August 17, 2020. ChargePoint joined the Partial Stipulation and recommends that the Commission approve it. This prehearing brief addresses only issues relevant to ChargePoint’s advocacy in this proceeding. For ease of reference, ChargePoint has labeled its subheadings below to correspond with the paragraph numbers and paragraph subheadings used in the Partial Stipulation.

12. Residential Tier Flattening:

ChargePoint supports the agreement among the Stipulating Parties to flatten the existing tiered rate structure for residential energy charges. Because EV drivers that charge their vehicles at home tend to use more electricity than an average residential customer, ChargePoint agrees with Pacific Power that tiered pricing structures can disincentivize transportation electrification.

ChargePoint appreciates that the Stipulating Parties have agreed to reduce the differential between the tiers to mitigate this disincentive.

13. Residential Time of Use Pilot:

ChargePoint supports the approval of Pacific Power's proposed Residential Time of Use (TOU) Pilot, Schedule 6, as modified by the Partial Stipulation. In Anne Smart's Opening Testimony on behalf of ChargePoint, Ms. Smart explained that TOU rates have the potential to save residential customers money, including those that charge their EVs at home, and increase and improve grid utilization to the benefit of the utility and all customers.¹

ChargePoint supports the Partial Stipulation's modifications to Schedule 6. First, creating an on-peak and off-peak period that applies year-round promotes simplicity and will reduce customer confusion. Second, reducing the duration of the on-peak period makes the rate more manageable for customers. Third, increasing the on-to-off peak ratio to 4:1 sends a more meaningful price signal to encourage off-peak consumption, including EV charging. Finally, expanding the pilot cap to 25,000 participants will help ensure that more customers who might benefit from Schedule 6 will be able to sign up.

ChargePoint recommends that the Commission approve Schedule 6, as modified by the Partial Stipulation.

14. Schedule 29 Pilot (General Service Time of Use):

ChargePoint supports the approval of Pacific Power's proposed General Service TOU Pilot, Schedule 29, as modified by the Partial Stipulation. In her Opening Testimony, Ms. Smart explained that traditional demand charges can make it difficult for prospective site hosts to economically justify deploying public DC fast chargers (DCFCs), especially during the early years

¹ Exhibit CP/100, Smart/9-10.

of EV adoption.² ChargePoint supports Schedule 29 because it mitigates the impact of traditional demand charges by pairing a TOU rate with a demand charge based on utilization (or load factor) in which the average energy price declines as utilization increases. Ms. Smart stated that TOU rates may not be a perfect application for public DCFCs, but because Pacific Power's proposed on-peak and off-peak windows generally align with standard business hours, Ms. Smart expected the TOU structure to have only minor, if any, impacts on driver experience.³

ChargePoint supports the Partial Stipulation's modifications to Schedule 29. First, exempting new customers from the pilot's 100 customer cap will increase the availability of the rate. Second, ChargePoint agrees to increasing the average energy charge for the first 50 kWh to \$0.25/kWh as a reasonable compromise. Third, aligning the TOU definitions with the definitions in Schedule 45 will promote simplicity and reduce customer confusion. Finally, allowing customers whose loads may have exceeded 1,000 kW once or twice in the preceding 12 months (but not more than 2,000 kW in the preceding 18 months) provides a reasonable accommodation to customers whose load may have exceeded 1,000 kW inadvertently or unexpectedly.

ChargePoint recommends that the Commission approve Schedule 29, as modified by the Partial Stipulation.

15. Other Pilot Programs:

In her Opening Testimony, Ms. Smart recommended that the Commission approve Schedules 6 and 29, and further recommended that the Commission or Pacific Power establish a defined time period for these pilots, after which data from the pilot could be analyzed and broader rate reforms considered.⁴ The Partial Stipulation adopts these recommendations; namely, Pacific

² *Id.* at 10-12.

³ *Id.* at 10.

⁴ *Id.* at 9-10 and 13.

Power will file two reports for all pilot programs: one after 15 months of experience and one after the pilot ends. ChargePoint appreciates that Pacific Power will share the lessons learned and information and data gleaned from the pilot programs, which will help inform future rate development. ChargePoint recommends that the Commission approve these commitments on the part of Pacific Power.

For these reasons, ChargePoint respectfully recommends that the Commission approve the Partial Stipulation.

ChargePoint's List of Active Participants

The individuals who may be active at the hearing on behalf of ChargePoint are Ms. Anne Smart, Vice President, Public Policy at ChargePoint; and Mr. Scott Dunbar, counsel for ChargePoint. However, if no party intends to cross examine Ms. Smart, ChargePoint intends to ask for Ms. Smart to be excused from the hearing.

ChargePoint's Cross Examination Statement

ChargePoint does not intend to cross examine any witnesses at hearing.

ChargePoint's Exhibit List

ChargePoint intends to request that Exhibit CP/100, the Opening Testimony of Anne Smart on Behalf of ChargePoint, Inc., be admitted into evidence in this docket. Exhibit CP/100 was electronically filed in this docket on June 4, 2020.

ChargePoint's List of Hearing Materials

ChargePoint does not intend to rely on any hearing materials other than Exhibit CP/100.

Respectfully submitted on September 2, 2020,

BY: /s/ Scott F. Dunbar

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