

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 1811

| | | |
|---|---|--------------------------|
| In the Matter of |) | CHARGEPOINT, INC.'S |
| Portland General Electric's Application for |) | UPDATED LIST OF PREFILED |
| Transportation Electrification Programs |) | TESTIMONY AND HEARING |
| |) | EXHIBITS; AND UPDATED |
| |) | CROSS EXAMINATION |
| |) | STATEMENT |

ChargePoint, Inc. (ChargePoint) hereby files its updated list of prefiled testimony and exhibits that it intends to move into the record at hearing, pursuant to Administrative Law Judge Ruth Harper's Revised Notice of Hearing and Memorandum issued on October 4, 2017. ChargePoint also updates its cross-examination statement.

As ChargePoint noted in its first list of prefiled testimony, ChargePoint had outstanding discovery requests to which it was expecting responses prior to the hearing. ChargePoint has since received responses to those requests and now seeks to enter the responses into the record of this proceeding. Those responses, Staff's responses to CP Data Requests No. 9 and 10, are attached hereto. Staff has stipulated to the admission of both of these responses. ChargePoint's counsel plans to bring hardcopies of these responses to the hearing for the convenience of the parties and the Commission.

ChargePoint intends to move the following prefiled testimony and exhibits into the record of this proceeding:

- ChargePoint Exhibit 100, Reply Testimony of David Packard;
- ChargePoint Exhibit 101, witness qualification statement (resume) of David Packard;

- ChargePoint Exhibit 200, Testimony Opposing Stipulation of David Packard;
- ChargePoint Exhibit 201, Oregon Public Utility Commission Staff response to ChargePoint's Data Request No. 04;
- ChargePoint Exhibit 300, Testimony Opposing Stipulation of Anne Smart.
- Oregon Public Utility Commission Staff responses to ChargePoint's Data Request No. 09 and 10.

ChargePoint also intends that its Objections to Stipulation and Request for Hearing filed on July 12, 2017 pursuant to OAR 860-001-0350(8) in this proceeding be a part of the record in this proceeding.

Finally, ChargePoint hereby notifies the Commission and the ALJ that it will waive cross examination of Siemens' witness Chris King.

Respectfully submitted this 10th day of October, 2017,

BY: /s/ Scott F. Dunbar
Scott F. Dunbar
Keyes & Fox LLP
1580 Lincoln St., Suite 880
Denver, CO 80203
Phone: 720-216-1184
Mobile: 949-525-6016
sdunbar@kfwlaw.com

Counsel for ChargePoint, Inc.

Date: October 6, 2017

TO: Scott Dunbar
Counsel for ChargePoint, Inc.
Keyes & Fox LLP
sdunbar@kfwlaw.com

FROM: Jason Klotz
Senior Utility Analyst
Energy Resources and Planning Division

OREGON PUBLIC UTILITY COMMISSION
Docket No. UM 1811 – ChargePoint’s Second Set of Data Requests 09-10

The following requests are in relation to the UM 1811 Stipulation and Joint Testimony in Support of Stipulation (Stipulating Parties/100), filed June 27, 2017, as discussed in the Reply Testimony of Jason R. Salmi Klotz (Staff/400).

CP Data Request No 09:

CP9. Please reference Mr. Klotz’s Reply Testimony (Staff/400) at page 4, line 19-20, where Mr. Klotz refers to “six new charging stations”; at page 5, line 20, where Mr. Klotz refers to “six charging stations”; and at page 8, line 18, where Mr. Klotz again refers to “six charging stations.” Please also reference the Stipulation, paragraph 24, which states that “PGE is limited to investing in a maximum of six additional Electric Avenue Charging sites under this settlement.”

- a. Please confirm that it is Staff’s understanding that PGE proposed in its Application to install up to four dual-head fast chargers and one level 2 charger at each Electric Avenue site, for a total of up to 30 charging stations or ports across six proposed Electric Avenue sites. If your response is anything other than an unqualified confirmation, please explain your answer in detail.
- b. Please confirm that, under the Stipulation, PGE may install up to four dual-head fast chargers and one level 2 charger at each Electric Avenue site, for a total of up to 30 total charging stations or ports across six proposed Electric Avenue sites. If your response is anything other than an unqualified confirmation, please explain your answer in detail.
- c. If the Stipulation modified the total number of charging stations or ports that PGE may install across six Electric Avenue sites, please provide a quotation and a citation for where in the Stipulation or the Joint Testimony in Support of Stipulation this modification appears.
- d. If the Stipulation did not modify the total number of charging stations or ports that PGE may install across six Electric Avenue sites, please explain in detail why Mr. Klotz refers to “six charging stations” rather than six charging station “pods,” “sites,” or another equivalent term.

Staff Response No CP9:

- a. Staff confirms that PGE proposed in its Application to install up to four dual-head fast chargers and one level 2 charger at each Electric Avenue site, for a total of up to 24

DCQC chargers and up to 6 level 2 chargers across six proposed Electric Avenue sites (or “stations” with Staff’s terminology).

- b. Staff confirms that pursuant to the Stipulation reached by Staff, PGE, CUB, ICNU, ODOE, Tesla, TriMet, Forth, and Greenlots, PGE may install up to four dual-head fast chargers and one level 2 charger at each Electric Avenue site, for a total of up to 24 DCQC chargers and up to 6 level 2 chargers across six proposed Electric Avenue sites (or “stations” with Staff’s terminology).
- c. As stated above in subpart (b), pursuant to the Stipulation reached by Staff, PGE, CUB, ICNU, ODOE, Tesla, TriMet, Forth, and Greenlots, PGE may install up to four dual-head fast chargers and one level 2 charger at each Electric Avenue site, for a total of up to 24 DCQC chargers and up to 6 level 2 chargers across six proposed Electric Avenue sites (or “stations” with Staff’s terminology). The Stipulation could be considered to have “modified” PGE’s Application proposal in the sense that the Stipulation imposes a cap that *no more than* 6 total charging sites (or stations) may be installed if the Stipulation is adopted by the Commission. If PGE sought to install any additional charging sites (or stations) above what was agreed to in the Stipulation, it would need file an application, go through the review process, and receive Commission approval. Please see the nine-party Stipulation at paragraph 24.
- d. Please see Staff’s response to subpart (c) directly above with regard to any “modifications.” Staff believes there may be a misunderstanding based on the difference in word choice used by ChargePoint and the Stipulating Parties to describe the Electric Avenue stipulation. To ensure the record is clear, Staff, PGE, CUB, ICNU, ODOE, Tesla, TriMet, Forth, and Greenlots stipulated that PGE may install up to four dual-head fast chargers and one level 2 charger at each Electric Avenue site. Staff and the Stipulating parties have used the term “station” as a synonym for “site” (see Stipulating Parties/100, Spak-Klotz-Jenks-Mullins-Shaw-Ashley-Whiteman-Hesse-Ratcliffe/10 at In 9 “six new community stations.”). Both words indicate a location. For example, a “gas station” is a location that typically has more than one “pump” or “charger” in this case. To use ChargePoint’s terminology, there will be a maximum of six sites, each site (location) can have 5 chargers. This amounts to a total of 30 chargers across the stipulated Electric Avenue pilot program.

Date: October 6, 2017

TO: Scott Dunbar
Counsel for ChargePoint, Inc.
Keyes & Fox LLP
sdunbar@kfwlaw.com

FROM: Jason Klotz
Senior Utility Analyst
Energy Resources and Planning Division

OREGON PUBLIC UTILITY COMMISSION
Docket No. UM 1811 – ChargePoint’s Second Set of Data Requests 09-10

The following requests are in relation to the UM 1811 Stipulation and Joint Testimony in Support of Stipulation (Stipulating Parties/100), filed June 27, 2017, as discussed in the Reply Testimony of Jason R. Salmi Klotz (Staff/400).

CP Data Request No 10:

CP10. Please reference Mr. Klotz’s Reply Testimony (Staff/400) at page 5, lines 6-15, where Mr. Klotz discusses what he refers to as PGE’s “small, incremental investments of ratepayer dollars over a ten-year period” and states that the Stipulation caps “PGE’s total investment in the Electric Avenue pilot at \$2.6 million.”

- a. Please confirm that it is Staff’s understanding that the Stipulation caps PGE’s ratepayers’ responsibility for the proposed Electric Avenue program at \$2.6 million. If your response is anything other than an unqualified confirmation, please explain your answer in detail.
- b. Please confirm that it is Staff’s understanding that the proposed \$2.6 million cap for the Electric Avenue program is a limitation on the program’s total net costs (i.e., after accounting for revenue from drivers using Electric Avenue stations and Clean Fuels Program credits), but that the gross cost of the Electric Avenue program may be higher than \$2.6 million under the Stipulation. If your response is anything other than an unqualified confirmation, please explain your answer in detail.
- c. Please confirm that it is Staff’s understanding that the Stipulation did not modify PGE’s estimate that the total upfront costs of the Electric Avenue would be approximately \$4.1 million (see page 60 of PGE’s Application for reference). If your response is anything other than an unqualified confirmation, please explain your answer in detail.
- d. Please confirm that it is Staff’s understanding that, if the Stipulation is approved, PGE would not make investments of \$260,000 per year in the Electric Avenue program. If your response is anything other than an unqualified confirmation, please explain your answer in detail.
- e. Please confirm that it is Staff’s understanding that, if the Stipulation is approved, PGE would make the entire capital investment it has proposed in Electric Avenue at the outset of the program, and that additional investments over the ten-year program would be for incidental costs such as operations and maintenance (O&M) costs. If your response is anything other than an unqualified confirmation, please explain your answer in detail.

Staff Response No CP10:

- a. Confirmed. The Stipulation reached by Staff, PGE, CUB, ICNU, ODOE, Tesla, TriMet, Forth, and Greenlots caps PGE ratepayers’ exposure to the costs of the Stipulated Electric Avenue pilot program at \$2.6 million. Please see the Joint Testimony in Support of Stipulation at Stipulating Parties/100, Spak-Klotz-Jenks-Mullins-Shaw-Ashley-Whiteman-Hesse-Ratcliffe/8, lines 1-4 regarding the cap on ratepayer exposure.
- b. Staff does not confirm the statement in CP DR No. 10 (b). The \$2.6 cap agreed to by Staff, PGE, CUB, ICNU, ODOE, Tesla, TriMet, Forth, and Greenlots is not a total cost limitation for PGE, rather, it is a risk sharing mechanism to protect customers. Regardless of the total cost to PGE for the stipulated Electric Avenue pilot program, PGE *cannot* recover more than \$2.6 million from ratepayers. Further, the \$2.6 million must be offset by any available tax credits and the value received from the Clean Fuels Program credits associated with the Electric Avenue chargers. Please see the Joint Testimony in Support of Stipulation at Stipulating Parties/100, Spak-Klotz-Jenks-Mullins-Shaw-Ashley-Whiteman-Hesse-Ratcliffe/8.
- c. Staff objects to this request in that “upfront costs” is vague. Without waiving the objection, Staff does not confirm the statement in CP DR No. 10 (c). Staff’s understanding is that \$4.1 million is the total estimated cost of the pilot as set forth in the Application. However, a common concern for Staff and the eight other Stipulating Parties was limiting ratepayer exposure to the cost of the Electric Avenue pilot program, therefore, the Stipulating Parties agreed to cap the amount that PGE can recover from ratepayers at \$2.6 million.
- d. Staff cannot confirm or deny the statement in CP DR No. 10 (d). It is premature for Staff or the other eight Stipulating Parties to determine the per year investment because it could depend on the site (or location) selected, lease, and other factors. Again the focus of the Stipulating Parties was capping the total cost to ratepayers. Given the direction of this data request to page 5 of Mr. Klotz’s Reply Testimony to CP and EVCA’s Objections, Staff would like to be clear that Staff said the investment breaks down to less than \$260,000 per year but did not say that PGE had stipulated to spending \$260,000 per year. Rather, Staff explained:

“The Stipulating Parties worked diligently and collaboratively to minimize the impact of the Electric Avenue Pilot to customers and to the market by further reducing the cost of the investment—by reaching agreement that the cost of the pilot will be offset by the value the of the Low Carbon Fuel Standard Credits produced from the six charging stations and any tax credits for the equipment. Further, all of the pilot costs are subject to a prudence review.”
- e. Staff cannot confirm or deny the statement in CP DR No. 10 (e). Please see Staff’s response to CP DR No. 10 (d).