

ELLEN F. ROSENBLUM  
Attorney General



FREDERICK M. BOSS  
Deputy Attorney General

DEPARTMENT OF JUSTICE  
GENERAL COUNSEL DIVISION

October 5, 2017

VIA ELECTRONIC MAIL ONLY

Attention: Filing Center  
Public Utility Commission of Oregon  
201 High Street, Suite 100  
P.O. Box 1088  
Salem, OR 97308-1088

Re: Notice of Errata –OPUC Docket UM 1811  
DOJ File No.: 330-030-GN0040-17

Filing Center:

The Oregon Department of Energy provides notice of errata to the Reply Testimony of the Oregon Department of Energy, filed on September 19, 2017. The Department's Reply Testimony was incorrectly labeled "Exhibit: ODOE/100." It should have been labeled "Exhibit ODOE/200." A corrected version of the Department's Reply Testimony is attached.

Sincerely,

Jeffery R. Seely  
Legal Secretary  
Natural Resources Section

JRS:jrs/#8536063

c: Wendy Simons, ODOE  
Jesse Ratcliffe, DOJ

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1811**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) REPLY TESTIMONY OF THE OREGON  
Transportation Electrification Program ) DEPARTMENT OF ENERGY  
Applications )  
\_\_\_\_\_ )

**Introduction**

The Oregon Department of Energy (ODOE, Department) appreciates the opportunity to comment on the response testimony filed by ChargePoint and the Electric Vehicle Charging Associations (EVCA) on August 25, 2017, which opposes the Stipulation agreed upon by several intervening parties, including ODOE. The stipulation provides terms for three pilot programs by Portland General Electric (PGE) to promote transportation electrification. ODOE welcomes and values the insights that ChargePoint and EVCA have expressed in their respective testimonies, particularly around the issues of promoting competition, innovation and customer choice with regard to electric vehicle (EV) charging infrastructure.

The Department continues to support the proposed addition of six Electric Avenue charging sites as specified in the stipulation, believing that moving forward with the pilot projects as described will be a useful step to better understand how to advance EV infrastructure and accelerate EV adoption rates.

**Effect of PGE’s Proposal on Competition, Innovation and Customer Choice**

One of the primary objections ChargePoint and EVCA have to the Stipulation revolves around the proposal’s ability to promote competition, innovation, and customer choice in the EV

charging market. ODOE agrees that these values are critical to fostering a healthy EV charging infrastructure marketplace, which is in turn a key component for achieving Oregon's zero emission vehicle and greenhouse gas emissions goals, and also recognizes that they are an important objective of Senate Bill 1547. ODOE also recognizes the potential for a utility with access to ratepayer funds to engage in the market in such a way that negatively impacts these values. However, given the size of PGE's proposed additions to the Electric Avenue network in comparison to the current and near-future status of the fast charging marketplace in the company's service area, ODOE does not see this as a serious concern at present.

The U.S. DOE Alternative Fuel Data Center alternative fuel locator on September 11, 2017 showed 35 locations accounting for 54 DCFC (Direct Current Fast Chargers) in the region bounded north to south by Portland and Salem, respectively, and east to west by Sandy and Hillsboro. This region roughly coincides with PGE's service territory. The additional six DCFC locations proposed by PGE plus their current location would give PGE seven out of 41 locations or about 17 percent of the DCFCs located in the service territory described above.

Electrify America, the entity in charge of the Volkswagen Group of America's National Investment Plan, is investing \$1.2 billion over the next 10 years primarily on EV infrastructure. The first \$300 million, 30-month investment proposal has been released and approved. The proposal includes several long-distance highway chargers to be installed in Oregon, while Portland has been chosen as one of eleven metropolitan cities to develop a community-based network encompassing several uses and charging capacities. It is unknown at this time exactly what will be installed in the region in the next 30 months; however it is expected that Electrify America's proposed network of chargers will significantly increase the number and functional capabilities of chargers in the region.

The proposed additions to the Electric Avenue network under the PGE Stipulation for Transportation Electrification Programs are not large enough to have significant inappropriate influence on competition, innovation or customer choice, but should provide additive positive impact on the market place in regards to these three market principles.

### **Conclusion**

ODOE maintains its position that PGE's Stipulation for Transportation Electrification Programs is appropriate and should be approved by the Commission. The learnings from the pilots will be informative and valuable, and will aid in the development of future transportation electrification projects capable of meeting the six statutory criteria outlined in Senate Bill 1547, including the promotion of competition, innovation and customer choice. If the Stipulation proceeds, ODOE looks forward to actively participating along with other parties to further define learnings and specify analysis methodologies to ensure maximum usefulness and appropriateness of pilot programs intended to meet the aims of Senate Bill 1547.

DATED this 5<sup>th</sup> day of October, 2017.

Respectfully submitted,

ELLEN F. ROSENBLUM  
Attorney General

*/s/ Jesse D. Ratcliffe*

---

Jesse D. Ratcliffe, OSB #043944  
Senior Assistant Attorney General  
Natural Resources Section