

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 UM 1811

4  
5 In the Matter of  
6 PORTLAND GENERAL ELECTRIC  
7 COMPANY,  
8 Application for Transportation  
9 Electrification Programs

STAFF'S CROSS-EXAMINATION  
EXHIBITS

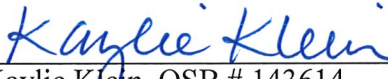
10 Pursuant to Administrative Law Judge Ruth Harper's August 15, 2017 Ruling, Public  
11 Utility Commission of Oregon Staff (Staff) submits the following cross-examination exhibits not  
12 previously filed in this case for the October 10, 2017 hearing on the stipulation filed in this  
13 docket on June 27, 2017.

Cross-Examination Exhibit	Description
Staff/500	ChargePoint Response to OPUC Staff DR 2
Staff/501	ChargePoint Response to OPUC Staff DR 10
Staff/502	ChargePoint Response to OPUC Staff DR 13
Staff/503	ChargePoint Response to OPUC Staff DR 15

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20 DATED this 2nd day of October, 2017.

21 Respectfully submitted,

22 ELLEN F. ROSENBLUM  
23 Attorney General

24   
25 Kaylie Klein, OSB # 143614  
26 Assistant Attorney General  
Of Attorneys for Staff of the Public Utility  
Commission of Oregon

OPUC 2. At ChargePoint 200, Packard/6, Mr. Packard states: "In ChargePoint's extensive experience with publicly available charging station programs around the country and in Europe, customer choice is the linchpin that determines whether a program will be successful or not."

Please provide factual evidence, data, analysis, and/or reports that customer choice, as articulated by ChargePoint, is the linchpin, or the determining factor, of a program's success or failure.

**Response:**

Mr. Packard's statement is based on his 19 years of experience in the EV charging industry.

Please see the sentences following the referenced testimony for an explanation of why customer choice is the determining factor of a program's success or failure.

**Sponsor:** Dave Packard

**Response Date:** September 18, 2017

The following refers to ChargePoint's Objection to Stipulation and Request for Hearing ChargePoint, Inc., dated July 12, 2017.

OPUC 10. On page 2 of ChargePoint's Objection, ChargePoint states that the Stipulating Parties acknowledge that the electric avenue program does not meet SB 1547's criteria. Please cite directly to the language where Stipulating Parties state affirmatively and directly that Electric Avenue does not meet the SB 1547 criteria.

**Response:**

ChargePoint objects to OPUC 10. ChargePoint's Objections were written and signed by ChargePoint's legal counsel in this proceeding, Mr. Scott Dunbar. The purpose of ChargePoint's Objections was to provide legal and policy arguments for the Commission's consideration, and not to introduce evidence that would be subject to discovery.

Notwithstanding the above objection, ChargePoint responds as follows:

The Stipulating Parties acknowledge that the transportation electrification proposals, which includes the Electric Avenue proposal, do not meet the SB 1547 criteria in Paragraph 2 of the Stipulation, which states, "[T]he Stipulating Parties have not agreed that the TE proposals meet the six statutory criteria outlined in SB 1547."

**Sponsor:** Scott Dunbar

**Response Date:** September 18, 2017

The following refers to ChargePoint's Objection to Stipulation and Request for Hearing ChargePoint, Inc., dated July 12, 2017

OPUC 13. On page 7 of ChargePoint's Objection, ChargePoint states, "The private, competitive charging station industry has already collected much of this information, and it is unnecessary for PGE to 'reinvent the wheel,' unless PGE is planning to compete with private market players."

- a. Please confirm that the "already collected information" that ChargePoint has access to (and refers to in the above quote) pertains specifically to PGE's service territory.
- b. Please confirm that the "already collected information" that ChargePoint has access to (and refers to in the above quote) pertains specifically to Oregon.
- c. Please provide the information that ChargePoint refers to as it pertains to PGE's service territory and/or Oregon.

ChargePoint objects to OPUC 13. ChargePoint's Objections were written and signed by ChargePoint's legal counsel in this proceeding, Mr. Scott Dunbar. The purpose of ChargePoint's Objections was to provide legal and policy arguments for the Commission's consideration, and not to introduce evidence that would be subject to discovery.

ChargePoint further objects to part c. of OPUC 13 to the extent that it seeks discovery of information that is confidential and proprietary, and the release of which could cause competitive harm to ChargePoint.

**Sponsor:** Scott Dunbar

**Response Date:** September 18, 2017

The following refers to ChargePoint's Objection to Stipulation and Request for Hearing ChargePoint, Inc., dated July 12, 2017.

OPUC 15. On page 15 of ChargePoint's Objection, ChargePoint states, "As ChargePoint explained in Reply Testimony, if PGE installs ratepayer-funded public charging stations, prospective charging station site-hosts will be reluctant to invest in their own charging stations when they see the utility fulfilling this role."

- a. Please provide the data ChargePoint relies on to draw this conclusion.
- b. Please provide the data and analysis ChargePoint conducted that shows when, or at what threshold number of publically available charging sites owned by utilities, utility-owned EVSE would result in reluctant investment from potential site-hosts.

ChargePoint objects to OPUC 12. ChargePoint's Objections were written and signed by ChargePoint's legal counsel in this proceeding, Mr. Scott Dunbar. The purpose of ChargePoint's Objections was to provide legal and policy arguments for the Commission's consideration, and not to introduce evidence that would be subject to discovery.

Notwithstanding the above objection, ChargePoint responds as follows:

- a. Please see ChargePoint 200, Packard/11, line 11 – Packard/12, line 3.
- b. ChargePoint has made no claims regarding "when, or at what threshold number" utility-owned charging stations would "result in reluctant investment from potential site-hosts." As noted in the quotation, ChargePoint has argued that utility-owned charging stations will make potential site-hosts reluctant to invest in charging stations at all.

**Sponsor:** Scott Dunbar

**Response Date:** September 18, 2017