Alliance for Transportation Electrification

June 27, 2025

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: UM 2056—PacifiCorp's 2026-2028 Transportation Electrification Plan

Enclosed for filing in the above-referenced matter please find the comments of the Alliance for Transportation Electrification.

Respectfully,

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COMMENTS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFRICATION

Introduction

The Alliance for Transportation Electrification ("ATE") is pleased to submit the following comments supporting PacifiCorp's 2026-2028 Transportation Electrification Plan ("TE Plan"). ATE finds that PacifiCorp's next-generation TE programs are comprehensive across customer classes, thoughtfully designed to meet customer needs, and positioned to support state policy goals.

Background

ATE is a 501(c)(6) non-profit corporation established in early 2018 with the goal of promoting policies and regulatory measures to accelerate the pace of EV adoption and infrastructure. We primarily engage with policymakers at the State and local government level to remove barriers to EV adoption and to encourage the acceleration of EV infrastructure deployment with a particular emphasis on open standards and interoperability. We have over 60 members that include many electric utilities; automobile, truck and bus manufacturers; EV charging hardware and service providers; and related trade associations and non-profit organizations. We take a "big tent" approach to advance the industry and focus not just on accelerating EV charging deployments—which necessarily requires a strong utility role—but also promoting public accessibility and open standards. We are presently involved in about 30 proceedings in the States before public service commissions, Legislatures, state energy offices, state departments of transportation, and other agencies.

ATE's overall goals are to engage with public service commissions and other agencies to remove barriers to EV adoption by encouraging a collaborative and open approach to accelerate the deployment of EV charging infrastructure, sharing best practice across jurisdictions, supporting an appropriate utility role by complementing the private/competitive market, developing effective outreach and education measures, and promoting interoperability and open standards in all parts of the EV charging ecosystem.

A Streamlined, Customer-Focused Portfolio

ATE appreciates PacifiCorp's efforts to streamline their transportation electrification ("TE") portfolio, focusing on the highest-impact programs that are most tailored to the needs of the customers and communities that the utility serves. In ATE's experience, a small number of utility TE programs, managed effectively, deliver more efficient benefits than a broader number of hyper-specific programs that may lack the administrative resources to be successful.

We particularly appreciate PacifiCorp's emphasis on customers, as outlined in the company's objective to increase customer satisfaction for those participating in TE programs. ATE has recently emphasized this customer focus with our members in a new strategic focus for the next several years, which will complement our traditional focus on both TE infrastructure and EV adoption. This customer-focused lens helps to fashion proposals to make the following programmatic changes:

- Focusing on income-qualified EV drivers by increasing residential EVSE rebate amounts for these customers and introducing an income-eligible rate at PacifiCorp-owned and operated EV chargers;
- Supporting non-residential customers through enhanced technical assistance, increased EVSE rebates, and streamlined processes such as a rebate reservation system;
- Meeting the needs of underserved communities through the E-Mobility Grant Program and an expanded, upgraded EV charging network; and
- Building out the approach to managing charging load through use of time-of-use ("TOU") rates and continuing the managed charging pilot.

Focusing on Income-Qualified Customers

ATE supports PacifiCorp's plan to focus the residential EVSE rebate program on income-qualified customers, and to enhance the rebate amount. PacifiCorp presents sufficient evidence that this approach is likely to reduce free ridership in the program—as the program evaluation indicates, program "influence" on customer behavior was 85 percent for income-qualified participants, versus 38 percent for all program participants.[1] [2]

Despite our support of PacifiCorp's program adjustment, we note that residential EVSE rebates remain an attractive offering to encourage customers to enroll in managed charging programs—a common program design practiced by Xcel Energy in Colorado and Minnesota, Consumers Energy in Michigan, and PGE in Oregon (among others). ATE encourages PacifiCorp to consider a standard residential EVSE rebate, paired with a mandatory managed charging component, as a potential future program offering.

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[1] PacifiCorp. *Oregon 2026-2028 Transportation Electrification Plan*. May 2025. Appendix E, pg. 29.

[2] For this reason, we also find that Oregon Public Utilities Commission staff ("Staff") err in their adjustment calculations to PacifiCorp's Benefit-Cost Analysis ("BCA"), where Staff discounted residential program benefits by 62 percent to account for free riders. Given PacifiCorp's proposed program changes limiting rebates to income-qualified customers, a more reasonable discount rate for the residential portion of the forward-looking BCA would be 15 percent.

Supporting Non-Residential Customers

ATE also appreciates PacifiCorp's enhanced support for non-residential customers, including fleets, workplaces, multifamily housing, and public charging. Enhanced technical services, for example, are an industry-leading practice that deliver value to customers as well as to the utility, which can begin to anticipate distribution grid needs for fleet customers well in advance of receiving a request for new service. For that reason, ATE advises all utilities to engage in some level of fleet advisory services with their customers.[3]

Grants and other incentives, also, continue to be important to helping non-residential customers accommodate the costs of electrifying their fleet vehicles or installing EV charging.

Meeting the Needs of Underserved Communities

ATE supports PacifiCorp's plan to upgrade its company-owned EVSE network, which now lags industry standards in terms of power output, and to fill observed market gaps by developing and building more company-owned and operated public EVSE in its service territory. The expansion and upgrade of PacifiCorp's network will benefit Oregonians who live and travel throughout the state, plugging gaps that the private market has not yet filled in rural and remote communities. And we find that PacifiCorp's industry-aligned pricing, reflected in Schedule 60 and updated with an income-eligible pricing category, supports the company's analysis that these investments will have a limited impact on the competitive market.

Meanwhile, PacifiCorp's budget allocation toward equity communities for the three-year period amounts to 68 percent of overall program expenditures, which we support strongly given the nature of the company's service territory. Since we track and monitor TE Plans and programs in about 30 states, we can attest that this level of program expenditure on underserved customers and communities is very robust.

Approach to Managed Charging

ATE views managed charging—whether passive (as in a TOU rate) or active (as in control via EVSE software or vehicle telematics)—as an essential component of a modern utility TE portfolio. These programs and pilots, while nascent, represent an important opportunity for utilities to capture the grid benefits of EVs, namely their flexibility with respect to when and how fast they charge. We are glad to see that PacifiCorp has launched its managed

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[3] Alliance for Transportation Electrification. *Fleet Advisory Services for Fleet Electrification: Meet Customer Needs and Provide Grid Benefits*. February 2023.

charging pilot, after some delay while the utility sought alignment across operating companies.

We also support the near-term use of TOU rates to drive EV charging to off-peak times. In the long term, we caution that TOU rates, if widespread among EV drivers, can result in "secondary peaks" on the system as the rate switches to off-peak. For this reason, we look forward to hearing more about the results from PacifiCorp's managed charging pilot, and we encourage continued investment in this area even after the 3-year pilot is complete.

Hardware and Software Interoperability

ATE continues to encourage the use of qualified product lists—such as EPRI's Vetted Product List,[4] which PacifiCorp references in multiple of its tariffs—which allow utilities to exercise some measure of quality control for the hardware and software that are deployed within its programs. In addition, we strongly recommend that all residential and non-residential EVSE on these lists be compliant with Open Charge Point Protocol ("OCPP").[5] This important protocol allows different hardware and software to communicate with each other, meaning customers can change software providers while maintaining the same hardware. This provides an important element of customer choice with respect to charge management services, and a crucial element of reliability so that hardware can remain operable even if a software vendor exits the market. Given that the EV charging market has seen multiple such exits just in the past year,[6] sometimes to the detriment of driver and customer experience,[7] we continue to emphasize the importance of providers not simply advertising compliance with the latest version of OCPP standard, but actually implementing it in practice so that EVSE can be migrated seamlessly to a new network operator and hardware infrastructure investments are not stranded.

Conclusion

Overall, ATE continues its support for PacifiCorp's EV programs in Oregon, which comprise a thoughtful portfolio of activity to support EV adoption across customer segments. We find that PacifiCorp has clearly articulated the need for the program changes they propose in their 2026-2028 Transportation Electrification Plan, and has supported these proposals with analysis from third-party program evaluations. We encourage the Commission to

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[4] Electric Power Research Institute. *Vetted Product List*. Accessed June 2025.
[5] OCPP is an evolving standard that is managed by the Open Charge Alliance, based in the Netherlands. OCCP 2.0.1 ed3 was approved as an International Electrotechnical Commission (IEC) standard in 2024. https://openchargealliance.org/protocols/open-charge-point-protocol/
[6] Electrek. *Shell Recharge exits the US EV charger software market*. December 2024.
[7] Canary Media. *Enel X Way abandoned its US EV charging customers. What happens next?*. October 2024.

approve PacifiCorp's TE Plan in a timely way, and we look forward to the results that PacifiCorp will achieve through these enhanced programs—which we believe will benefit EV drivers, utility ratepayers, fleets and host sites, and the State of Oregon.