



ChargePoint, Inc.

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October 28, 2020

Garrett Martin, Commissioner Policy Advisor
Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, OR 97301-3398

Re: 2020 PUC EO 20-04 Work Plans

Dear Mr. Martin,

The Public Utility Commission of Oregon (Commission) can play a significant role in helping the state reduce its greenhouse gas (GHG) emissions, as outlined in Governor Brown's Executive Order No. 20-04 (EO 20-04). ChargePoint welcomes the opportunity to provide comments on the proposed activities outlined in section three of the work plan related to transportation electrification (TE).

ChargePoint's detailed comments on the proposed TE activities are provided below:

1. Prioritize utility investments in make ready infrastructure and consider TE as load within distribution system planning.

The draft plan proposes, "Prioritizing appropriate TE infrastructure investments within distribution system planning" (page 17).

ChargePoint applauds the Commission's initiative in engaging the wide range of regulatory issues related to electric vehicle (EV) charging. EVs represent a new and flexible load that should be considered within the distribution system planning process. Jurisdictions around the country are exploring more flexible and resilient regulatory frameworks that support EV adoption, ensure that new load is well-integrated into the grid, establish sustainable and scalable roles for public utilities to advance TE, and support innovation and competition in the EV charging market.

ChargePoint supports considering TE as load within distribution system planning and urges the Commission to encourage utility make ready infrastructure investments to advance TE in the state.

ChargePoint believes that utility programs are most effective when they support customer choice, competition, and innovation in charging stations and network services. To this end, ChargePoint asserts that appropriate support from utilities include 1) rebates for residential and commercial customers to purchase smart, networked chargers, and/or 2) make ready programs that allow the utility to invest in and own the lines, wires, and conduit (collectively known as "make ready") necessary to install a charger.

In the make ready investment model, the utility directs investments toward installing and maintaining the supporting electrical infrastructure on the distribution side as well as the customer side of the meter up to the connection point of the charging station. By covering this work, a utility prepares a site for installation of the charging station itself, which is purchased and operated by the site host. While utilities have not traditionally owned infrastructure on the customer side of the meter, installing, owning, and maintaining



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this type of infrastructure are within a utility's core competencies and are the types of activities evaluated in the distribution system planning process.

Both rebates and make-ready accelerate the deployment of charging infrastructure by reducing total project costs for site hosts. Rather than a "one-size, fits-all" solution, these incentives could enable site hosts to choose the EV charging equipment and network that works best for them from a list of pre-qualified vendors. Providing choice supports a sustainable, competitive EV charging market that provides innovative products to meet customers' needs.

ChargePoint notes that the capital cost of installing EV chargers can exceed equipment costs, particularly in older properties and rural areas. These capital costs are largely attributable to trenching and make ready needed to make a parking space ready to install a charging station. Providing incentives for, or investing in, make ready on the customer's side of the meter can help overcome this barrier by lowering the charging station site host's cost of deploying chargers.

ChargePoint believes that the distribution system planning process provides an avenue for utilities and the Commission to plan for new EV load and to evaluate opportunities for utilities to invest in make ready infrastructure to support the growth of this new load. We strongly support the approach to "Consider line extension allowances for transportation electrification that scale the multiplier with greater grid integration capabilities" (page 18) and urge it be prioritized. To that end, ChargePoint recommends that the Commission amend the first objective under "Transportation Electrification" in the Commission's plan to read as follows: "Prioritizing appropriate TE infrastructure investments within distribution system planning, including evaluation of utility investments in make ready infrastructure on both the customer side and the utility side of the meter to support EV charging station deployment."

2. Support creation of new rate schedules that encourage transportation electrification and cost-effective electric vehicle charging behavior.

The draft report also proposes, "Collaborating on new rate schedules and tariffs that encourage transportation electrification, grid-efficient electric vehicle charging behavior, and is beneficial to all ratepayers, including those in impacted communities" (page 17).

ChargePoint strongly supports efforts to ensure that the development of Oregon's EV charging market benefits the grid and all ratepayers, especially impacted communities. Utility rate design is an effective tool for incentivizing off-peak EV charging and both PGE and Pacific Power have been leaders in tariff design. There is no "one-size-fits-all" alternative to traditional utility rates, and utilities should have flexibility in developing appropriate solutions for customers. It may also be necessary to design tariffs to respond to different customer needs, for example a tariff designed for residential customers may not work well for commercial or fleet charging station operators. At this time, many jurisdictions have developed innovative rate structures that allow utilities to collect sufficient revenues, while at the same time promoting the installation of EV charging infrastructure and beneficial charging of EVs.

However, the Commission should consider the full range of EV load management options at its disposal to ensure that the increased adoption of EVs leads to beneficial load growth across the grid. Utilities should be motivated to incentivize customers to install networked charging stations, which are capable of "smart" or managed charging and can respond to signals from utilities or system operators, through standards such as OpenADR. These networked stations may be used to achieve the important objective of



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ensuring charging occurs during periods of grid demand and/or high renewable energy generation. The shifting of charging load can be best effectuated by empowering operators or site hosts of the charging stations using available technology and partnerships with utilities and network service providers, either in response to a tariff, or a demand response or managed charging pilot.

3. Support a stakeholder dialogue to improve our TE planning guidelines and program requirements to streamline utility processes and clarify cost-recovery criteria.

ChargePoint appreciates this objective and welcomes the revisions that could enable utilities to propose TE plans and programs and receive Commission review and approval more quickly. We continue to support simple, straightforward utility programs like make ready and rebate programs (discussed above) that can easily be expanded, are widely agreed upon, and which would streamline both the utilities' and the Commission's processes.

4. Support approaches to assess cost-effectiveness of TE activities, beyond load planning, that promote GHG reduction goals and the transition to clean energy resources.

ChargePoint encourages the Commission to include the emission reduction benefits of TE programs in the evaluation of cost effectiveness of TE programs¹.

Accordingly, ChargePoint recommends that the Commission consider modifying the fourth bullet point under "Transportation Electrification" (page 17) as follows: "Exploring approaches to assess cost-effectiveness of TE activities beyond load planning, which promote GHG reduction goals and the transition to clean energy resources, including consideration of GHG reduction benefits in cost-benefit analyses of TE programs."

5. Support tracking market transformation indicators to be tracked by the utilities and shared annually with the OPUC, in addition to TE plans.

ChargePoint supports the utilities tracking data to help inform progress made on the goals set forth in the executive order. We are pleased to see this data will be anonymized and that the utilities will be tasked with tracking, as they are in the best position to provide this data on an ongoing basis. To help facilitate robust data collection, we urge that eligibility criteria for utility charger programs include that the EVSE be capable of network communications and collecting charging data. We note that is not necessary for utilities to own the charging stations in order to track or gather this data. ChargePoint, and other charging network providers, have the ability to offer utilities direct access to charging data, while meeting all relevant state and utility customer privacy and security policies.

ChargePoint welcomes the opportunity to discuss these proposed actions further and looks forward to working with the Commission to support its GHG reduction efforts.

Please feel free to contact me at alexandra.leumer@chargepoint.com if you have any questions.

¹ <https://www.ethree.com/e3-finds-up-to-5-billion-in-benefits-from-ev-adoption-in-new-york/>



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Sincerely,

A handwritten signature in black ink that reads "Alexandra Leumer". The signature is fluid and cursive, with the first name being more prominent.

Alexandra Leumer
Director of Public Policy
ChargePoint