27 October 2020

Megan Walseth Decker, Chair
Letha Tawney, Commissioner
Mark Thompson, Commissioner

Comments to Transportation Electrification Section of the PUC Report - Response to EO 20-04 Draft Work Plans

Dear Commissioners and Staff,

We appreciate your work in drafting work plans to identify and manage the numerous activities the Public Utility Commission plans to undertake to help reduce GHG emissions in accordance with the goals set forth in EO 20-04. Successful transition to transportation electrification requires attention to the broader ecosystem of all components of transportation electrification. This includes regulating the transition of all vehicles, light-, medium- and heavy-duty, on-road, off-road etc. to electric, ensuring that electrification infrastructure is accessible and affordable, ensuring that transportation electrification solutions meet the needs of a diverse range of communities (including underserved communities), developing culturally appropriate outreach and education that enables folks to easily make the transition, partnering with labor groups to ensure that a diverse and competent workforce is trained and available to transition us to a zero-emission transportation sector and is able to keep the new system running smoothly and so much more.

Climate Solutions recently released a transportation research report that shows that the way to meet Oregon's transportation GHG emission goals, on top of other important co-benefits such as reducing air pollution, is to decarbonize everything, shifting to 100% clean energy, including our transportation sector as well as reducing the vehicle miles we travel. For state agencies to meet the directives of EO 20-04 and attempt to meet our GHG emissions reductions and climate goals it must include electrifying the transportation sector as a whole, conducting targeted outreach that addresses the barriers of all communities and provides community-led solutions as well as scaling transportation electrification options.

In the Transportation Electrification of the report, the Commission refers to Section 3.C and 5.B (2) of EO 20-04 as directives that influence the goals and objectives of the Transportation Electrification section. As written, we believe that there are missed opportunities that address both Sections 5.B (2) of EO 20-04 as well as Section 3.C (2): "Prioritize actions that will help vulnerable populations and impacted communities adapt to climate change impacts." We recommend the following considerations to the work plan that aim to support EO 20-04 Sections 5.B (2) and 3.C (2).

Recommendations that support Section 5.B (2) of EO 20-04:

a. *Medium and Heavy Duty Electrification:*

Besides requiring utilities to transition their fleets (light-, medium-, and heavy-duty) to electric, there is no priority directing utilities to develop plans to reduce barriers and invest in medium- and heavy- duty charging infrastructure. The California Air Resources Board recently reported one of the key barriers to battery electric vehicle adoption as infrastructure. CARB reported, "Infrastructure has emerged as the current largest issue, requiring increased attention as fleets transition from a handful of vehicles to larger deployments." On July 10th, 2020 Governor Brown signed on to a 15-state Medium and Heavy Duty (MHD) ZEV MOU committing our State to work along with other states to accelerate the adoption of MHD ZEVs. In the STS Multi-Agency Implementation Work Plan, DEQ proposed adopting new emissions standards and ZEV requirements for medium- and heavy-duty trucks. If adopted this rule would essentially adopt California's emission standards for new medium- and heavy- duty trucks and requirements for manufacturers to make zero emission medium- and heavy- duty vehicles available for sale in Oregon.

Although heavy- duty vehicles comprise 10 percent of all vehicles on the road, they account for nearly 25 percent of total U.S. climate pollution from transportation, and 45 percent of NOx emissions. Ensuring available infrastructure for the transition of medium- and heavy- duty vehicles is not only critical to meet our GHG targets but it also improves our air quality specifically for low-income and communities of color who disproportionately live near hot spot pollution zones, and assists in the deployment and standardization of medium- and heavy- duty charging infrastructure.

With Oregon committed to the transition of medium and heavy duty fleets to ZEV fleets, **we recommend the Commission direct utilities to coordinate with other state agencies such as DEQ and ODOT who are conducting needs analyses and barriers studies to understand gaps and opportunities in the medium- and heavy-duty sector, while also exploring public-private partnership models that can support large scale projects such as charging infrastructure, education and outreach, etc. We also recommend the Commission to direct utilities to incorporate medium- and heavy-duty electrification plans into future Utility TE dockets in order to support the electric transition of Oregon's medium- and heavy-duty sector.**

b. Transportation Electrification At Scale:

Utilities play an important role in ensuring that transportation electrification infrastructure is widespread, publicly accessible and affordable. In a fact sheet shared by representatives from Portland General Electric and Citizens Utility Board in support of HB 4066A, it stated, "As the transportation sector transitions to electric vehicles, utility customers expect the utility to provide the backbone infrastructure to support EV charging. Building that backbone requires readying the grid for the needs of businesses and individuals who are increasingly going electric, and allows us to capture all the benefits to our economy and environment that transportation electrification brings." It is our view that it is the role of the Commission to require utilities to electrify at scale to the fullest extent possible to ensure that ratepayers benefit from all types of utility investments to transportation electrification such as, stability in electricity prices, reduction

of shared costs to the system, proactive investments to the grid, expansion of grid-connected EV charging that further supports decarbonization and ratepayer benefits.

For the last couple of years, utilities have been investing in pilot projects and small programmatic investments that lack the true large scale investments needed for us to meet our SB 1044 goals. In addition, the PUC has scaled back the previous proposed TE investments from PGE. Per EO 20-04, various agencies have been working to provide analyses and policy recommendations to accelerate transportation electrification. For example, ODOT has been tasked to develop a Transportation Infrastructure Needs Analysis that can be useful for utilities to use to determine where and what type of transportation electrification infrastructure is needed. This example is one of many publicly funded programs, not to mention private studies that utilities should be exploring to assist with understanding stakeholder and community needs and filling those gaps where possible.

We recommend the Commission direct utilities to develop large-scale transportation electrification plans that significantly increase the amount of money currently being invested under the TE plans and that are projected to help the state achieve its ambitious electric vehicle adoption goals. We also recommend these investments be informed by ongoing transportation electrification needs analyses (including community needs analyses). The ultimate aim should be comprehensive transportation electrification investments at scale that benefit all ratepayers and that help achieve SB 1044 goals.

Recommendations that support Section 3.C (2) of EO 20-04:

a. *Community Engagement:*

The multitude of opportunities created by a transition to transportation electrification also comes with a myriad of barriers to a successful transition that vary based on an individual's geography, socio-economic status, culture and more. It is up to State agencies to engage with a diverse range of underserved stakeholders, and communities (especially underserved communities), to ensure that unique barriers are accounted for and solutions are developed with the community and for the community.

We recommend the Commission to direct utilities to work with diverse and underrepresented stakeholders and communities to identify community-led solutions that address transportation electrification barriers and lead to equitable transportation electrification solutions.

Government agencies are accountable to their citizens thus, integrating community-led solutions into policy decisions is not only the right thing to do but it means that we can move closer to implementing policies and programs that actually work for communities. This being said, community engagement is an important resource and should be compensated and accommodated accordingly.

We recommend that the Commission create a best practices plan for utilities to engage in equitable community engagement that considers the following but not limited to: compensation, child-care, food, accessible locations close to transit options, accessible virtual/off-line options, accommodations for folks with disabilities, etc. With acknowledgement that if community engagement was not conducted with equitable engagement best practices in place, then decisions and solutions obtained may not be robust and may not include solutions for certain marginalized and underrepresented community members who were not present during the engagement process.

While the "Impacted Communities" section of this report identifies community engagement as a priority activity and encourages utilities to proactively interact with stakeholders on proposed projects that impact underserved communities, **we recommend elevating this language to encourage and/or direct proactive and equitable community engagement to *all* processes that impact and/or may unintentionally impact or burden/harm underserved communities.**

b. Energy Burden:

In the Impacted Communities Section of this Work Plan, we appreciate the Commission outlining steps to quantify and mitigate energy burden for impacted communities. In the context of transportation electrification, energy burden must also be taken into consideration as transportation electrification has the potential to exacerbate energy burden for impacted communities.

Currently there is a cost disparity between ratepayers who charge their electric vehicles at home versus those who do not have access to home charging and depend on public charging. As personal electric vehicles become the norm independent of a person's income, people without access to home charging infrastructure will pay more than those with affordable, home charging rates for their electric transportation costs, exacerbating energy burdens especially for low-income, renters, and households of color (paying up to three times more than the average household on home energy costs).

We recommend the Commission prioritize addressing cost disparities of electric vehicle charging as an energy burden-related barrier to widespread transportation electrification adoption.

c. Targeting Benefits to Underserved Ratepayers:

Lastly, transportation electrification policies and programs have generally not successfully engaged with impacted stakeholders and impacted communities to understand their unique barriers and community solutions to those barriers.

IOUs must benefit all ratepayers and transportation electrification advancements have continued to leave out underserved community needs. Utility pilots, large-scale transportation electrification programs and transportation electrification policies that advance transportation electrification must include proposals and solutions that were developed with and for underserved communities, understanding their unique TE barriers and needs, and providing

programs and services that meet those specific needs. If the needs of underserved communities are not met, we will not achieve our overarching SB 1044 goals.

We recommend that the Commission explicitly direct utilities to devote a portion of their transportation electrification work to address transportation electrification barriers that low-income, renters and BIPOC ratepayers face and invest in community-led solutions.

Conclusion:

We are grateful for all the work that Commission Staff has put into this Draft Work Plan to ensure that the Commission does its part in achieving the goals set forth in EO 20-04 and appreciate the opportunity to provide comment for consideration.

Sincerely,

Victoria Paykar
Oregon Transportation Policy Manager
Climate Solutions