

Chapter 5. Stakeholder Engagement

5.1 Stakeholder Engagement

PGE believes that planning the transition to electric transportation requires broad engagement, including utilities, regulators, private charging providers, government agencies, advocates, customers, and the communities we serve. In the spirit of engagement, PGE participated in active dialogue among those previously mentioned in 2021 and 2022 during the OPUC's investigation into the development of a transportation electrification investment framework for utilities (TEIF filed under Docket No. UM 2165) and the subsequent revision of the Commission's Division 87 rules governing utility TE plans and programs (Docket No. AR 654). PGE found these proceedings a valuable forum to gather input, not only to inform the Commission's regulatory policies and processes, but to also give PGE and other utilities insight into stakeholder expectations, concerns, and priorities about utility TE plans. PGE's participation in these dockets and the information and comments shared has informed our TE-related planning processes and is reflected in this plan, our TE budget, and the associated program and infrastructure measure applications.

Under the previous Division 87 rules, we expected to file our TE Plan in February of 2022. However, to be better aligned and to develop the plan with the guidance expected to emerge from UM 2165, we received a waiver to delay our TE Plan filing. Midway through the investigation, the Oregon Legislature passed HB 2165. This caused the OPUC to reevaluate the investment framework, delay plan filings, open AR 654, and revise the Division 87 Rules. Although utility and stakeholder efforts were redirected to these issues, this process fostered dialogue about many of the same questions and issues that would have surfaced in TE plan-focused outreach and engagement efforts.

PGE continued to engage with stakeholders throughout UM 2165 and AR 654 to identify and work towards consensus on the appropriate metrics. This led to establishing benchmarks, tracking progress, and measuring our TE portfolio performance.

Additionally, PGE facilitated six public TE Planning workshops in 2022 and 2023. These multi-hour workshops were well attended and focused on the deep nuances of TE planning at a utility. This included everything from high level strategy to market research to detailed discussions of technical standards. PGE is grateful to the more than 100 stakeholders on the TE Planning stakeholder distribution list for their time and thoughtful feedback through these discussions. When added together this is more than thirteen hours of public discourse on the scope, scale, and size of PGE's TE portfolio. The workshop materials and recordings remain publicly available on PGE's TE planning website.¹⁷⁷

PGE also engaged individually with key stakeholders and leveraged other PGE outreach and engagement efforts to learn more about stakeholder perspectives and needs relevant to TE. This TE Plan incorporates information from this and other community outreach and engagement efforts in the company's DSP work, as well as experience gleaned from the other PGE outreach and engagement efforts to learn more about stakeholder perspectives and needs relevant to TE. Thus, our TE plan incorporates what we have learned from the company's community outreach and engagement efforts in the company's Distribution System Planning work, as well as experience gleaned from the Smart Grid Testbed and Flexible Load Multi-Year Planning processes. This section describes the various means by which PGE has engaged with stakeholders at the portfolio level. This engagement included

¹⁷⁷ PGE. *Transportation Electrification Planning*. Retrieved from <https://portlandgeneral.com/energy-choices/electric-vehicles-charging/electrifying-transportation/transportation-electrification-planning>.

a rapid needs assessment, real-time feedback in TE Plan workshops, written correspondence, informal conversations, surveys, and focus groups. The following figure provides an overview of the stakeholder feedback process, which is discussed in further detail below.

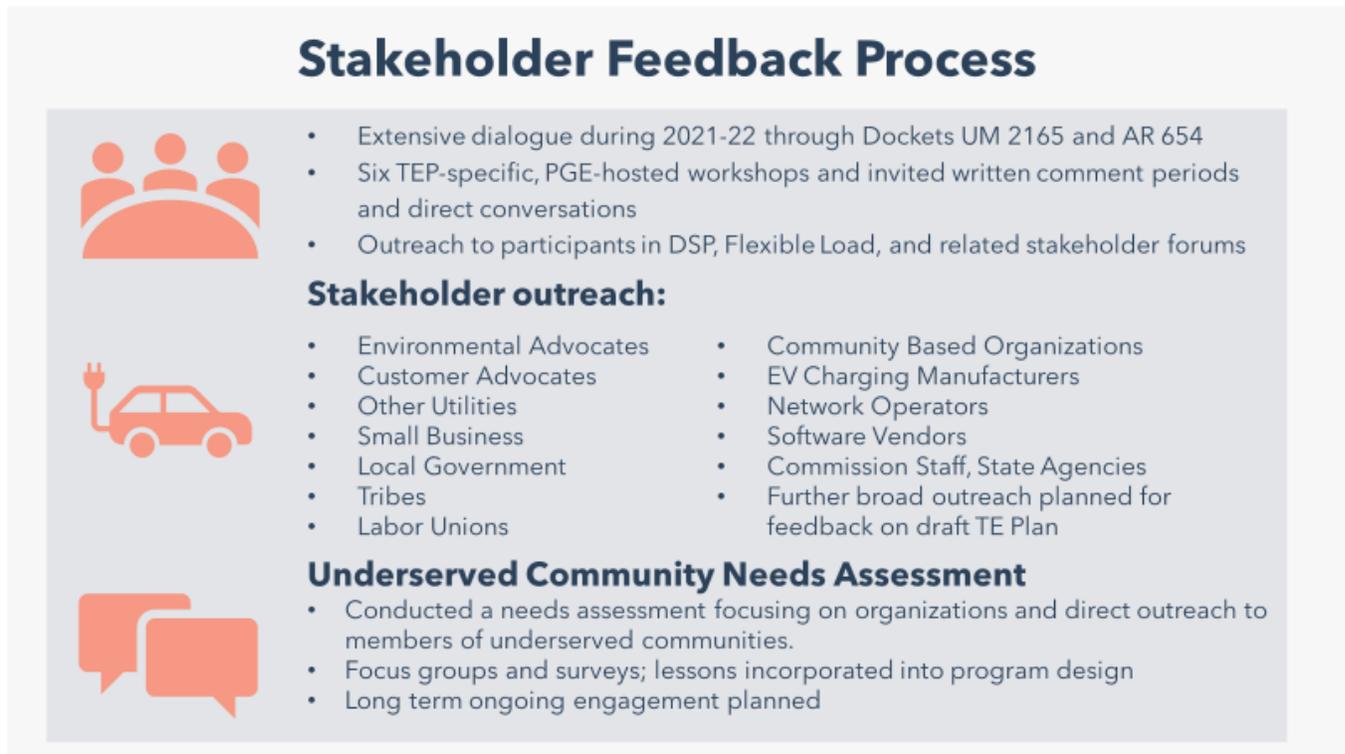


Figure 15. Stakeholder Feedback Process

[Appendix A](#) and [Appendix C](#) address stakeholder engagement unique to existing and new activities, respectively. Additional granularity on stakeholder comments and PGE’s responses are provided in [Appendix D](#).

[Sections 5.1.1](#) and [5.1.2](#), below, provide additional detail on PGE’s efforts to engage communities beyond the traditional utility stakeholder organizations.

5.1.1 Community Outreach and Engagement

As an essential service provider, PGE is committed to serving our communities. We believe community engagement is based on the belief that those impacted by a decision, program, project, or service system need to be involved in the decision-making process. This belief supports PGE’s community engagement principle “nothing about me without me,” which guides how we conduct and evolve our equitable community engagement practices. Additionally, we believe that an affordable and equitable clean energy future requires a commitment to diversity, equity, and inclusion throughout our business.

During this process PGE contracted Espousal Strategies, LLC, a consultant with expertise in collaborative problem solving, equity and inclusion, and community engagement to assist with our engagement and outreach efforts. Espousal Strategies performed a rapid needs assessment, which included leading focus groups, conducting surveys to community-based and community-serving organizations, and direct outreach to members of underserved communities. This assessment

provided insight and a starting point for more comprehensive TE community engagement in August 2022. Key information from the assessment are incorporated into this filing. Targeted engagement efforts are summarized in [Sections 5.1.3](#) and [8.4](#), with further detail found in the program and infrastructure measures applications in the Appendices.

This work builds upon information previously gathered through other PGE community outreach and engagement efforts and invites a deeper understanding of the TE needs of individuals within specific communities. This work is one of many ways in which PGE can build a stronger understanding of the diverse needs of individuals, as well as establishing meaningful relationships with these communities.

In discussions on how best to engage, stakeholders recommended PGE to include community group capacity-building¹⁷⁸ in our TE planning. In this context, capacity-building means providing long-term support and compensation for their time and contributions, and also building up their understanding of utility regulatory process so they might participate in additional OPUC engagements. We plan to execute this strategy as follows:

- Adopt the best practices co-developed with community-based and community-serving organizations leading up to the recent DSP I and II filings.
- Leverage the PGE Community Engagement Framework the Greenlining Institute’s Mobility Equity Framework, and the City of Portland’s Pricing Options for Equitable Mobility (POEM) framework (a local guide to equitable mobility) to guide our work.
- Commit to an iterative approach that will lean on the guidance and expertise of a local, minority-owned and -led third-party facilitator which we will hire through the in-progress Request for Proposal (RFP) for long-term engagement work.
- Convene a TE community working group for sessions at least semi-annually to delve into programs at various stages. These work group sessions will focus on gaining specific feedback to make program implementation and future planning more accessible and equitable.
- Compensate individuals for their participation using funds from the HB 2165 Monthly Meter Charge and the Oregon Clean Fuels Program.

[Section 8.3](#) describes in more detail on how we plan to execute on this input through our long-term engagement plans.

5.1.2 Community Learning Labs

Community Learning Labs are a public meeting space created for an introductory audience which includes, but is not limited to, community-based organizations (CBO), community-serving organizations, environmental justice advocates, other community collaborators and individuals. We designed our Community Learning Labs to foster an interactive experience for participants to learn about energy-related topics such as the TEP. Community Learning Labs aim to build awareness as well as inform and collaborate with both communities and individuals on specific topics and seek feedback from participants.

On April 20, 2023, the TE team presented at the Community Learning Lab and discussed the following topics with stakeholders: the Clean Fuels Program, TE portfolio revision, and the TE budget. The intention of the presentation was to provide updates to attendees and solicit feedback on areas

¹⁷⁸ National Council of Nonprofits define capacity building as, “an investment in the effectiveness and future sustainability of a nonprofit.” <https://www.councilofnonprofits.org/tools-resources/what-capacity-building>.

of opportunities and considerations before the draft filing. Participants were engaged throughout the Lab and asked critical questions and offered thoughtful comments. These are summarized in [Appendix D](#).

5.1.3 Acting on Feedback from Stakeholder and Community Outreach and Engagement

[Appendix D](#) collects specific stakeholder input PGE received in response to our six workshops, as well as stakeholder comments gathered from filings in UM 2165 and AR 654. [Appendix D](#) also addresses how PGE has incorporated or otherwise addressed the relevant comments in our plan.

In response to stakeholder feedback and the rapid needs assessment of underserved communities, we adjusted our TE Plan. Below are actions we took from the input received through stakeholder feedback and the rapid needs assessment:

- We reduced the scope of our TE plan in response to concerns about the cost and rate impact of the proposal and have implemented a phased approach so that some programs launch in 2024 instead of 2023.

We were asked to consider requiring customer cost-sharing where appropriate and have added this feature to

- Business and Multi-family Make-ready Solutions program, with a tiered cost sharing structure to promote charging that is open to the public and/or serves underserved communities.
- In response to comments from stakeholders, we have affirmed that we will not require a minimum 150 kW power level for customer-owned DCFC that PGE helps incentivize.

In the

- Business and Multi-family Make-ready Solutions program, we will offer a higher rebate amount to all multi-family dwellings, as well as offer a reservation of rebate funds in advance to help address financial barriers often faced by underserved communities. In addition, this program will include more targeted education and outreach to underserved communities to help address the education barriers of EV charging incentives available to non-residential customers. Finally, we will work with CBOs to conduct outreach and assist in identifying potential multi-family locations as well as more targeted education and awareness directly at multi-family sites in underserved communities.
- Undertake long-term engagement with underserved communities and explore an electric micromobility strategy funded by the Oregon Clean Fuels Program. This reflects the need to determine PGE's role for non-drivers and also those for whom an EV is out of reach. Additionally, the Drive Change Fund and Electric School Bus Fund grants will include increased outreach to, and prioritization of, underserved communities in grant evaluation.
- In the Public Charging - Municipal Charging Collaboration program, we will help build awareness and education specifically to underserved communities where chargers are installed. To address feedback that education and knowledge are one of the largest barriers to TE that underserved communities face, PGE will provide additional targeted education and outreach that addresses how to use pole chargers and provides more information Schedule 50. The Company will use data gathered during the administration of this program to inform possible updates to Schedule 50 that might benefit customers. Additionally, we will partner with municipalities communicate effectively with underserved communities regarding this offering.
- For Fleet Partner, we will track the percentage of infrastructure built in underserved communities and conduct communications and outreach events for general fleet electrification once a project is in service. Additionally, we will add targeted education and outreach to transit agencies, school districts, and other fleets in underserved communities.
- The Residential Smart EV Charging program addresses financial and education barriers through program changes. To help remove financial barriers, we will explore both point-of-purchase rebates (as opposed to post-purchase rebates) and also ongoing support throughout the installation process. We have offered a higher rebate amount for income-eligible customers and increased income eligibility from 80 percent of area median income to 120 percent of state median income.
- We added more targeted education and outreach to underserved communities across multiple programs in response to feedback on knowledge barriers in underserved communities.