

Appendix F. Division 87 Concordance

Table 87, below, provides a reference as to how this filing addresses Division 87 rules applicable to the portfolio of activities. [Appendix C.1 Public Charging - Municipal Charging Collaboration](#) and [Appendix C.2 Business and Multi-family Make-ready Solutions](#) address how new activities proposed within this filing meet the rules applicable thereto.

Table 87. Division 87 Concordance (Rules 1-3, for the Transportation Electrification portfolio)

Division 87 Rule	Section(s) that Address the Rule
(1) This rule prescribes the required elements of an electric company's Transportation Electrification Plan (TE Plan). The objective of the TE Plan is to:	
(a) Integrate the electric company's transportation electrification actions into one document. The Plan shall include, but is not limited to, the electric company's portfolio of near-term and long-term transportation electrification actions, including applications for program(s), and infrastructure measure(s), planning and expenditure of the Monthly Meter Charge, and other transportation electrification actions such as PGE Clean Fuels programs.	Chapter 7 , Appendix A , Appendix C
(b) Act as a summary of the electric company's investments and activities, which may include investments and infrastructure for electric vehicles of various sizes, rate design, programs, and services, reasonably expected to achieve the objectives of Oregon Laws 2021, chapter 95. The TE Plan shall seek to address areas most affected by market barriers in the electric company's service territory, prioritize load management, and to provide benefits for underserved communities.	Chapter 9
(2) An electric company must file for Commission acceptance of a TE Plan.	The full filing will meet this requirement
(a) As used in this rule, "acceptance" means the Commission finds that the TE Plan meets the criteria and requirements of this rule and does not constitute a determination on the prudence of the individual actions discussed in the TE Plan. The Commission may accept the TE Plan subject to conditions. Acceptance, or acceptance subject to conditions, shall constitute approval of the electric company's program applications and TE Budget as filed in the TE Plan and its appendices. Non-acceptance means that the TE Plan does not meet the criteria or requirements of this rule.	
(b) An electric company must present a draft TE Plan to Commission staff and stakeholders for review and comment on or before May 1, every three years starting in the year 2025, or as otherwise directed by the Commission. The TE Plan shall include the three calendar years after the year the TE Plan is presented.	This filing is consistent with this requirement and direction given utilities in

Division 87 Rule	Section(s) that Address the Rule
	Commission Order No. 21-484 ³³² .
(c) The electric companies will work with Commission staff to propose a schedule to parties for draft TE Plan review, comment, and workshops.	PGE will work with Commission staff and stakeholders to propose an appropriate review process and schedule.
(d) After public review of the draft TE Plan, the electric company must file a final TE Plan with the Commission, noting how the electric company responded to parties' comments.	PGE will comply, continuing the stakeholder engagement laid out in Chapter 5 , as well as additional responses as laid out in Appendix D .
(e) Commission staff will present its recommendation on the electric company's TE plan at a public meeting. The Commission shall also consider party and electric company comments and recommendations on a TE Plan at the public meeting before issuing an order of acceptance. The Commission may provide direction to an electric company regarding any additional analyses or actions that the electric company should undertake in its next TE Plan.	n/a
(f) An electric company may propose TE Plan updates at any time between scheduled TE Plan filings. An electric company is required to file a TE Plan update for material changes to its TE Plan. Material changes are new TE program or infrastructure measure applications, or program or infrastructure measure changes that require new incremental ratepayer dollars. Commission staff will work with parties to propose a schedule for public review of TE Plan updates.	PGE will comply in the event an update to the TE Plan or Budget is necessary during the 2023-2025 cycle.
(3) The TE Plan must include	
(a) The current condition of the transportation electrification market in the electric company's Oregon service territory, including, but not limited to:	Chapter 4
(A) A discussion of new state policies and programs since the last TE Plan filing;	Section 4.1.1
(B) Market barriers that the electric company can address and other barriers that are beyond the electric company's control, including any identified	Section 4.6

³³² OPUC Order No. 21-484, retrieved from <https://apps.puc.state.or.us/orders/2021ords/21-484.pdf>.

Division 87 Rule	Section(s) that Address the Rule
emerging challenges to transportation electrification, charging, and vehicle technology updates;	
(C) Existing data reasonably accessible to the electric company on the availability, reliability, and usage patterns of charging stations;	Section 4.7
(D) Number of electric vehicles of various sizes in the utility service territory and projected number of vehicles in the next ten years;	Section 4.3.1
(E) Other transportation electrification infrastructure, if applicable; and	Section 4.5
(F) A forecast of public and private charging infrastructure needed in the company's service territory to support transportation electrification. The forecast should utilize a Commission-approved tool to estimate needed public charging infrastructure over the next ten years and include type, location and timing of needed infrastructure.	Section 4.4
(b) A summary of the electric company's transportation electrification portfolio of program(s) and future transportation electrification concepts and actions in its Oregon service territory for the next three years. The summary should include the company's long-term vision for its TE portfolio and strategy to support transportation electrification in its service territory. The TE Plan must incorporate project lessons learned and any other relevant information gathered from other transportation electrification infrastructure investments, programs, and actions to ensure that lessons learned are carried forward to the next TE Plan;	Chapter 7
(c) A discussion of how programs and infrastructure measures in the TE Plan holistically advance performance area categories that include, but are not limited to:	Chapter 8
(A) Environmental benefits including greenhouse gas emissions impacts;	Section 8.1
(B) Electric vehicle adoption;	Section 8.2
(C) Underserved community inclusion and engagement;	Chapter 5, Section 8.3
(D) Equity of program offerings to meet underserved communities;	Section 8.4
(E) Distribution system impacts and grid integration benefits;	Section 8.5
(F) Program participation and adoption;	Section 8.6
(G) Infrastructure performance including charging adequacy which considers, but is not limited to reliability, affordability, and accessibility;	Section 8.7

Division 87 Rule	Section(s) that Address the Rule
(d) Supporting data and analysis used to develop the TE Plan, which may be derived from elements such as review of costs and benefits, rate design, energy use and consumption, overlap with other electric company programs, and customer and electric vehicle user engagement;	Chapter 9
(e) A discussion of the electric company's potential impact on the competitive electric vehicle supply equipment market, including consideration of alternative infrastructure ownership and business models, and identification of a sustainable role for the electric company in the transportation electrification market;	Section 7.4
(f) Analysis of the estimated ratepayer impact of the TE Plan over the next three calendar years; and	Section 9.7
(g) The electric company's TE Budget. The TE Budget must include: (A) Annual budgets for the TE Plan for the three calendar years after the year the TE Plan is presented to Commission Staff and stakeholders. The annual budgets should include a discussion of the context of anticipated long-term expenditures for the next ten years, including but not limited to benefit-cost analysis "cost tests;"	Chapter 9
(A) A forecast of all expenditures to support transportation electrification grouped by program and/or infrastructure measure, and further divided into:	Section 9.2
(i) Capital expenditures; and	Section 9.2
(ii) Expenses, separating administrative costs, O&M on investments, incentives paid to program participants, and any other unique category as relevant;	Section 9.2
(B) A forecast of all funding sources to be utilized, including but not limited to, the Monthly Meter Charge, grants, Oregon Clean Fuels Program credits, base rates, and deferrals based on a reasonable estimate, including a discussion of how actual revenue might vary from the estimate;	Section 9.3
(C) A forecast of all spending on underserved communities, grouped by program and/or infrastructure measure and further divided into:	Section 9.4
(i) Expenditures of funds collected through the Monthly Meter Charge as required by Oregon Laws 2021, chapter 95 Section 2;	Section 9.3.1
(ii) Spending from revenues other than the Monthly Meter Charge, including but not limited to grants, Oregon Clean Fuels Program credits, base rates, and deferrals;	Section 9.3
(D) The Commission's acceptance of the electric company's TE Plan will constitute approval of the TE Budget, which includes the Monthly Meter Charge budget as required by Oregon Laws 2021, chapter 95 Section 2.	n/a