Summary of May 15, 2025 TE Draft Plan Stakeholder Engagement Feedback

The following table provides a detailed summary of the feedback received from a May 2025 feedback workshop with external stakeholders and how PGE has considered the feedback.

Business EV Charging Rebates

What changes or improvements would you suggest for this program? Please respond with a short statement

Summary of Comment	PGE Response
Consider dedicating minimum level of funding for DCFC to support customers w/o access to home charging. Consider expanding size of program and consider $55k/port as the floor for DCFC rebates.	Thank you for your valuable input. We are actively evaluating a strategic approach to optimize our program's budget allocation. This includes the potential introduction of an installation rebate to complement our existing DCFC rebate offering. While a final decision is still pending, we are carefully considering this option to enhance the overall effectiveness and accessibility of the program.
I would suggest limiting the investments in multifamily first, and then low-income second. Only invest in other businesses if program not filled with the first two categories	We appreciate your feedback and will take your suggestion into consideration.
Require participation in managed charging programs in order to receive charger rebates	Thank you for your suggestion. PGE is actively developing comprehensive managed charging programs for commercial customers. While current rebate incentives

Summary of Comment	PGE Response
	don't require participation in these programs, we plan to integrate managed charging requirements as our demonstration initiatives evolve into pilots or full-scale implementations.
I would hope to specifically have recommendations on cost effective rates for multifamily. It feels criminal to see rebates go to appts charging 65c/kWh	We appreciate your feedback on this matter and will explore solutions to potentially mitigate such scenarios as well as work to refine data on multifamily charging sessions if pricing differences occur between public charging and multifamily users.
Redesign MFH incentives to allow for greater installations, incentivize access to as many residents as possible, not L2 in a communal set up. 10 years is too long to expect sites to send data.	Thank you for your feedback. We will take your suggestions for the Multifamily incentives into consideration. Currently, there are no penalties if a charger is retired prior to 10 years.
Consider moving the bulk of funding toward the make-ready/installation, rather than the EVSE, to better align with the utility's role to serve load	Thank you for your suggestion, we have included an installation rebate for make-ready as part of the Rebates program in the 2026-28 TE Plan.
Ensure eligibility for third-party providers for fleet-focused infrastructure	The program tariff only allows rebate incentives to be issued to the PGE customer of record who owns or leases the site, as they are responsible for maintaining the equipment and fulfilling participation terms.
I wonder if the budget is possibly under-sized. (Hard to know how TE will evolve due to federal cuts to incentives/grants.)	Thank you for your feedback. The program's budget was increased significantly for the 2026 - 2028 TE Plan; however, if warranted and possible, we will explore avenues to support EV charging access further.
Given how quickly things change and extenuating circumstances, 10 years of operation can be a difficult requirement to meet.	We appreciate your feedback on this program requirement and will take it into consideration as we continue to develop the program. Currently, there are no penalties if a charger is retired prior to the 10-year contract end date.
Earmark some funds to not just reach underserved census tracts, but more specifically reach underserved individuals. E.g. pocket of funds that go to public / affordable housing	Thank you for your suggestion. We are considering partitioning the programs funding for individual rebate types such as the DCFC rebate, which is exclusively available to projects in underserved communities.
This is a very well done change. Increasing the amount for MFH ports and including make ready is an amazing addition!	Thank you for your support.

Clean Fuels Program

What else did you want to see the Clean Fuels Program funds support? Please respond with a short statement

Summary of Comment	PGE Response
I like the proposal. Hope to see a focus on the schedule 50 participation	Thank you for the support; we will be implementing outreach activities to promote the Schedule 50 in 2025 which can influence additional marketing efforts in 2026-2028.
V2G demonstration in connection with microgrid testbed demos.	We will take this into consideration as future V2G demonstrations are scoped and developed.
Load management solutions for MFH properties (not L2 networked chargers) and not make-ready/panel upgrades.	Thank you for the comment. We are currently leading a multifamily managed charging demonstration which will inform future efforts with regard to load management solutions and opportunities in this space.
Really support the idea of adding technical assistance - this is a best practice among utilities around the country.	Thank you for the feedback and support.
I suggest that CFP credit $$ should incentivize customers in the Smart Charging Pilot, based upon kWh usage. Keep incentivizing the customers that are generating the CFP credits by their activity.	Thank you for the comment and feedback. We are currently utilizing Monthly Meter Charge revenue to support the Residential Smart Charging Pilot.

Commercial Managed Demo

What changes or improvements would you suggest for this program? Please respond with a short statement.

Summary of Comment	PGE Response
Incentivize participation by performance - how manageable and reactive is each of these loads	Our incentives will be primarily based on participation (e.g., customer does not exceed # opt-outs in a #-month period, or amount of kWh shifted off-peak, etc.). These demos will reveal the effectiveness and uptake of each Managed Charging approach and will inform how we price future incentives to achieve the flexible load needed.
Focus on distribution optimization, prioritize direct, authorized integrations with automakers, prioritize recurring incentives.	A couple use cases will be distribution-focused, precisely because the large commercial EV loads can affect the distribution system (overloads on local feeders/substations). We are prioritizing direct integrations with EV OEMs or EVSE Charge Management Systems (CMS), depending on which equipment is used to manage charging.
Please look at different customer payment models as an outcome of the pilot.	The customers own and manage the chargers, so they are in control of pricing. The majority of these demonstrations

Summary of Comment	PGE Response
We have found that commercial projects are keen to pass cost to the user in high /kWh costs that make them unreasonable for	will be located at private commercial sites which would not affect public charging users.
For success, needs strong user stakeholder engagement.	We agree; the customers (Fleet/Workplace/Multifamily site operators) will be engaged from end-to-end (project scoping, implementation, and final reports). Many of the desired learnings are about the customer experience, so this is essential.
Learnings around types of charging integration and challenges	Many of our learning objectives are about the ideal system architecture, compatibility with customer-owned hardware/software, and seamlessness/reliability from the top down.
I'm curious how this program may overlap with resiliency charging hubs. I envision chargers, solar arrays and battery systems together on sites. Curious about DCFC could be DC-coupled to batteries.	We predict these Managed Charging solutions will unlock ability to manage other onsite loads, as well. It is possible we'll include batteries or solar in these demonstrations if already located on-site – however, testing priority will focus on the EV-only features first.
Work to ensure the assets are deployed in a non-wires capacity to maximize grid benefits and asset acquisition deferral (locationally targeted). Will these all be fleet? Or include public?	Commercial demonstrations encompass Fleet, Workplace, Multifamily. Public chargers could be involved depending on the flexible load potential. We agree that deferred infrastructure investments are a key learning.
Could consider adding and piloting flexible connection as well	Flexible Interconnection will be included as a use case. We are investigating how dynamic/real-time we could set schedules for Flexible Interconnection agreements, but plan to test some version of it.
This seems like a reasonable approach. It would be ideal to have a mechanism to scale managed charging programs for specific customer segments prior to the next program phase, prior to 2028/2029.	Each demonstration will produce a final report with recommendations for a future pilot program (if it is recommended). Timelines will differ per demonstration, but most will close out in 2027/28.
No changes per se, don't know enough, but would like to see more communication about this kind of tool/strategy and the advancement towards VPP deployment.	We agree these demonstrations will reveal the VPP potential for commercial segments. We aim to share learnings at industry conferences, through annual reports, other engagements as requested and pass down best practices to customers and vendors.
I feel that these funds would be better served in the Business Charging rebate, Drive Change Fund, or other existing rebate programs.	Thanks for your feedback, we agree those are valuable customer programs. These demonstrations are more targeted to advancing the VPP and grid resilience which may flow from rebate programs in the future.

Fleet Partner

Do you support proposed 2026–2028 changes to Fleet Partner? If no, please share your recommended changes in a short response.

Summary of Comment	PGE Response
Why is there reduced port installation under the current plan as compared to last plan?	PGE has seen decreased fleet applications and commitments in 2024 and 2025. Market conditions indicate that fewer fleets will be electrifying over the next several years, reducing the number of ports the program is projected to enable.
It seems that if other factors are reducing demand, this means a need for more support to encourage fleet electrification. Understood though, if vehicles not available/affordable.	Market conditions indicate that fewer fleets will be electrifying over the next several years, but we will monitor market conditions to determine if adjustments are warranted. We benchmark our program incentives against other utility programs regularly, as well, and the recent benchmarking activity shows that our fleet make-ready incentives are consistent with other utility programs.
Disappointed, but understand	Thank you for your understanding of the market impacts to the program.
It's curious to give less support during a recession. LDV fleets should still have plenty of need for support, even in a freight recession.	PGE has seen decreased fleet applications and commitments in 2024 and 2025 including fleets with LDV's. Market conditions indicate that fewer fleets will be electrifying over the next several years, but we will monitor market conditions to determine if adjustments are warranted.
Great program!	Thank you for the recognition.
I hope that PGE has some opportunity for increasing the budget later as needed if some market uncertainties resolve favorably.	Market conditions indicate that fewer fleets will be electrifying over the next several years, but we will monitor market conditions to determine if adjustments are warranted.
Fleet charging will be an essential part of MHD electrification, esp. with projected ACT roll backs. And the PGE service territory will be essential to promoting health benefits from MHD EV	Fleet Partner remains committed to educating customers about the benefits of fleet electrification and assisting customers along their electrification journey.
City of Portland is putting a larger emphasis on freight decarb and fleet transition with new projects & we were hoping to connect more companies with this program - would love to chat more offline!	Please contact the program at FleetPartner@pgn.com. The program is here to support fleet customers in their electrification journey.
This seems like a drastic cut in funds dedicated to this program, while what we're hearing is that more technical assistance and make-ready incentives are needed for fleets.	Technical advisory services remain a key component of Fleet Partner. Market conditions indicate that fewer fleets will be electrifying over the next several years, but we will monitor market conditions to determine if adjustments are warranted. We benchmark our program incentives against other utility programs regularly, as well, and the recent benchmarking activity shows that our fleet make-ready

Summary of Comment	PGE Response
	incentives and technical advisory services are consistent with other utility programs.

Municipal Pole Charging

Do you support proposed 2026–2028 changes to Municipal Pole Charging? If no, please share your recommended changes in a short response.

Summary of Comment	PGE Response
While challenging, PGE should seek to increase the number of pole charging beyond the 180 goal from the prior plan	Thank you for your support of this program. Unfortunately, the program has encountered several challenges, including a limited supply of suitable poles and locations. Additionally, we've faced difficulties with software vendors and incurred unexpected costs, making the program more expensive than initially projected. As a result, expanding the program beyond the current 180 units would be difficult under present conditions.
Thank you for maintaining commitment to this demonstration project despite difficulties and slowdowns.	Thank you for your support.
Understand the challenges from the last iteration, but very much support adding new chargers if municipalities request / support. Esp. considering reduction in other public charging options.	Thank you for your comment. We have thoroughly engaged with all municipalities that have suitable infrastructure for this program. While we remain open to future changes in stance, we are currently focusing our efforts on collaborating with the cities that have expressed an interest in moving forward. The other municipalities have clearly communicated their decision to not participate at this time.
Would love to see continued expansion of this program - I remain hopeful that there are more opportunities for pole chargers in Portland, especially as we've recently gotten over regulatory/permit hurdles!	Thank you for your support of this program. PGE is committed to our collaboration with the City of Portland to accelerate the deployment of pole-mounted EV chargers. We aim to significantly increase installations throughout 2025.
I'd like to see more information about the costs of this infrastructure, even with your explanation that this would go beyond 2028 (potentially) still seems high in my lay opinion. More info please.	The funding in the 2025 TE Plan is reserving funds to maintain pole chargers through 2031.
Consider expansion of this program for the viable poles that don't yet have charging	Thank you for your comment. Unfortunately, the program has encountered several challenges, including a limited supply of suitable poles and locations. Additionally, we've faced difficulties with software vendors and incurred unexpected costs, making the program more expensive than initially projected. As a result, expanding the program beyond the current 180 units would be difficult under present conditions.

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Look into smart panels that would work line a VPP inside the home and manage customer loads and expand utilization of existing grid infrastructure.	Thank you for this suggestion. All options to optimize existing grid infrastructure will be considered.

Portfolio Support

Do you support proposed 2026–2028 changes to Portfolio Support? If no, please share your recommended changes in a short response.

Summary of Comment	PGE Response
Rates will be important to TE management moving forward	Thank you for your comment.
Makes sense.	Thank you for your comment.

Public Charging - Electric Avenue

Do you support proposed 2026–2028 changes to Public Charging - Electric Avenue? If no, please share your recommended changes in a short response.

Summary of Comment	PGE Response
There is a need to add HD charging in PGE territory beyond Electric Island	Thank you for your response, we will continuously analyze and investigate the HD charging needs throughout PGE territory.
You are doing great work with this	Thank you.
Ensure costs won't increase if move to 3rd party. Better evaluate the challenges of the last iteration.	3rd party ownership is in the research phase. As research continues, pricing impacts to customers will be evaluated as one factor in considering other ownership models.

Residential Smart

What changes or improvements would you suggest for this program? Please respond with a short statement.

Summary of Comment	PGE Response
If I understand correctly, not sure a $25 credit is sufficient to accelerate participation or reflect the value to PGE in meeting load	Thank you for the feedback. We are proposing increased enrollment rebates to incentivize program participation.
Preference for direct, telematics integration for most benefit (current incentives are not so aligned). Distribution optimization will provide	Thank you for your comments. The pilot allows customers with direct control telematics enabled vehicles and direct control enabled chargers to participate in the Pilot. As we optimize dispatch strategies, we will look at the effects of

Summary of Comment	PGE Response
more value than blanket DR "windows" (same as rates??)	EV charging on both the distribution system and system level.
Incorporate interactive V2G demonstration element.	We will take this into consideration as future V2G demonstrations are scoped and developed. Residential V2G is currently being explored in PGE's SmartGrid Testbed.
The vast majority of EV impacts are at the distribution level. Adding distribution-optimization would dramatically reduce upgrade needs and costs for EVs, improving affordability for all customers.	We appreciate your feedback. As we optimize dispatch strategies, we will look at the effects of EV charging on both the distribution system and system level.
Income restrictions should be applied to home chargers given most homeowners have the financial ability to buy L2 EVSE. If not, the rebates should require TOU rate and forced DR program opt-in.	Thank you, we will take your suggestion to limit the pilot's upfront incentives to specific income levels into consideration. The program does require DR program enrollment as a condition of receiving the upfront rebate incentives.
I suggest that customers should receive an incentive for per/kWh dispensed. Clean Fuel Credit $$ should incentivize customers to keep fueling with electric. Useful for PHEVs especially.	We appreciate your feedback and will take your suggestion into consideration. We are exploring residential rate development through portfolio support in 2026-2028
V2G integration pilots would be great to see	We will take this into consideration as future V2G demonstrations are scoped and developed. Residential V2G is currently being explored in PGE's SmartGrid Testbed.
Moving towards consistent active management vs. just demand response events can maximize the impact of managed charging programs. Expanding eligible auto and EVSE OEMs promotes equitable access.	Thank you for your comments. The pilot is looking to optimize its dispatch strategies in 2026-2028. The pilot recently added one charger manufacturer to its qualified product list and is working toward adding more chargers and EV OEMs in 2025 onward.
That data desire is reasonable in theory but in practice it cab gave a substantial cost in equipment selection and ongoing connection fees that is one of the big factors in the increased user costs in multifamily units. We see that as a significant issue that continues to widen the EV access dived between those with res EV charging access and those living in MF housing.	Business EV Charging pilot provides higher incentives for multi-family charging to help offset the costs of networked chargers.
Creativity in incentive design so res rates are not drastically different from Res Smart Charging	We will take this into consideration moving forward.
I would like to encourage going to a usage-based incentive rather than a flat rate paid twice yearly. This would be financed by Clean Fuel Program credit	Thank you for your comment. We are exploring residential rate options in portfolio support financed by MMC in 2026-

Summary of Comment	PGE Response
monetization. PGE should be encouraging on-going fueling of EVs. This could matter most with customers with PHEVs, who have fuel choices.	2028 but there is potential to explore CFP funding for equitable electrification if needed.

Charging Resiliency Hub Demonstration

What changes or improvements would you suggest for this program? Please respond with a short statement.

Summary of Comment	PGE Response
I am not sure that EV charging is higher priority in resiliency context as compared to keeping lights on etc. Also, concerned this may operate in a silo and not be integrated with other state resiliency.	This demonstration is intended to go beyond enhancing EV charging availability. The charging hubs would not only provide power to electric vehicles in island mode during outages but also contribute to grid health by leveraging their integrated battery systems. This dual functionality showcases a more resilient and efficient approach to EV infrastructure.
Worth exploring	Agreed, thank you.
Would it be possible to design as mobile systems so that they can be moved to emergency areas?	PGE is still investigating, but it would be unlikely that these hubs would be mobile, based on the need to have this tied to the grid, as well as the size and weight of the battery backup system.
Open mindedness to incorporate fleet infrastructure	Fleet vehicles would be able to use these charging stations for emergency power but we have separate Fleet charging incentives to encourage on-site fleet electrification.
This might be possible for one or two sites. Just with costs of batteries	As we define the specifications, we will understand how many sites we can deploy in the given demonstration budget.
Make sure reducing costs to customers. explore battery integration, microgrids, other resources that might be provided during emergency situations.	We plan to conduct a competitive RFP to assess the latest technology and achieve the most cost competitive proposals.
Per the conversation during the meeting, it would be helpful to align this program with other resilience projects, build off the organizing and funding for those projects.	We are exploring collaboration with other existing projects to leverage faster deployment and more efficient use of multiple funding streams.
I worry projects will potentially be very costly, and $2M may end up serving only one or two hubs. I would recommend making it broader, and not require solar/BESS, but just charging	This demonstration is intended to provide backup power in the event of a PSPS event, which requires battery storage. We are researching the most cost effective solutions for batteries.

Strategic Grid Investments

What changes or improvements would you suggest for this program? Please respond with a short statement.

Summary of Comment	PGE Response
Would be helpful to understand how this differs from status quo when new a EV charging project needs to be energized. Would this upgrade be done on behalf of one customer or multiple customers?	The demonstration is focused on constrained capacity areas with high and continued interest from TE customers. Strategic Grid Investments demonstration locations are intended to benefit multiple customers from multiple EV use cases.
Suggest that the program prioritize GETS opportunities before expansion	We will make sure to evaluate all options before confirming that an infrastructure upgrade is necessary.
Managed charging is demonstrated to be more cost-effective	Thank you for this feedback. The TE team continues to investigate managed charging as part of a separate demonstration.
Focus on underserved areas to enable more public or MFH charging expansion, helping to increase EV adoption.	Rural and historically underserved areas will be prioritized in the criteria for selecting projects.
Ensure care to avoid looking to narrowly at existing/known fleet depots (support emerging business model of 3rd party charging hubs)	The site selection process will be rigorous and data driven to determine which data sources best support predicting locations most likely to lead to new TE load.
Tracking timeline of implementation	Projects selected will be limited to ability execute within three years.
Study the investments into storage versus transmission investments. utilize utility-owned DER to reduce transmission upgrades.	Ongoing efforts around DER and storage are underway. Thank you for the suggestion to monitor those when considering projects for strategic investments.
I want to learn more about how this can be a resource, integration with VPP etc. how this can support the grid. will this be a non-wires solution or is it just being used to bring on more resources?	This is an effort to confirm ability to use additional data sources to identify grid upgrades needed to enable TE load in areas that are constrained and where high interest from TE customers is shown.
Should consider how/when to use state electrification targets (i.e., ACT) to determine where strategic grid investments will be needed	Thank you for the suggestion. The team will investigate the use of state electrification targets while determining where investments are needed.
Would be interested in seeing how those areas of high TE interest are determined. Transparency is important, especially as programs like this grow over time. Which they should.	Final data sources and selection criteria isn't finalized but will include factors such as: proximity to a highway corridor, creation of a minimum of two MW of new capacity, expected benefits to LDV and MHD public charging and MHD fleet depot charging, cost of upgrades versus MWs of new capacity created, existing EV load requests in the area.