



UE-220359

# ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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October 7, 2022

## SENT VIA WUTC WEB PORTAL

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: PacifiCorp d/b/a Pacific Power & Light Company 2022 Transportation Electrification Plan,  
Docket UE-220359

Dear Director Maxwell:

The Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel) respectfully submits these comments in response to the July 28, 2022, Notice of Opportunity to Comment on PacifiCorp's (the Company) Transportation Electrification Plan in Docket UE-220359. These comments address PacifiCorp's 2022 Transportation Electrification Plan.

### *Public Counsel's Recommendation*

Public Counsel recommends the Commission acknowledge PacifiCorp's Transportation Electrification Plan and encourages the Company to continue to engage with their Equity Advisory Group on electric vehicle programming.

On May 20, 2022, PacifiCorp submitted their Transportation Electrification Plan for acknowledgement by the Commission, pursuant to RCW 80.28.365. The statute provides that a plan may include:

- (a) Any programs that the utility is proposing contemporaneously with the plan filing or anticipates later in the plan period;
- (b) Anticipated benefits of transportation electrification, based on a forecast of electric transportation in the utilities' service territory; and
- (c) Anticipated costs of programs, subject to the restrictions in RCW 80.28.360.<sup>1</sup>

<sup>1</sup> RCW 80.28.365(1).

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In evaluating Transportation Electrification Plans, the statute also provides that the Commission may consider the following:

(a) The applicability of multiple options for electrification of transportation across all customer classes; (b) the impact of electrification on the utility's load, and whether demand response or other load management opportunities, including direct load control and dynamic pricing, are operationally appropriate; (c) system reliability and distribution system efficiencies; (d) interoperability concerns, including the interoperability of hardware and software systems in electrification of transportation proposals; and (e) the benefits and costs of the planned actions.<sup>2</sup>

PacifiCorp's initial filing includes a discussion of the electric vehicle (EV) market broadly, as well as within the Company's territory in Washington State. The plan also outlines the Company's main objectives: (1) improving access to charging, (2) reducing costs of electric transportation, (3) electrifying equitably, and (4) reducing carbon dioxide emissions and grid impacts. PacifiCorp's plan addresses benefits and costs, distribution impacts, and various programs and activities that the Company intends to implement. The Company's Addendum, filed on September 28, 2022, contained an updated forecast and additional information about program targets and budget details. The Addendum also includes additional details about reporting, distribution grid impacts, and interoperability of EV charging stations.

UTC Staff coordinated informal feedback among stakeholders. Public Counsel provided informal feedback and engaged with stakeholders about PacifiCorp's programs and planning efforts. In general, Public Counsel believes that the plan filed by PacifiCorp meets the statutory provisions. We appreciate the additional details provided in the Addendum, particularly regarding budget and goals for the number of projects or customers that the Company hopes to reach.

We believe that the Company's focus on access for multifamily housing is important and we encourage PacifiCorp to continue to engage their Equity Advisory Group on approaches to reach this segment of customers. The Company does propose a survey for multiunit dwelling owners, managers, and residents to learn about how those groups perceive EVs. Public Counsel believes that the Company could consider a small pilot project guided by input from the Equity Advisory Group to begin developing programs for these customers.

In addition, Public Counsel notes that there are a number of other recent initiatives at the state and federal level to develop rules for EVs or encourage their adoption, such as the Washington

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<sup>2</sup> RCW 80.28.365(2).

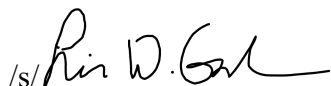
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State Department of Agriculture's rulemaking on EV supply equipment or the Inflation Reduction Act. Public Counsel encourages PacifiCorp to participate in and leverage these opportunities to deliver programs for their customers, providing updates to stakeholders, and revising their plan as appropriate.

In conclusion, Public Counsel believes the Commission should acknowledge PacifiCorp's Transportation Electrification Plan and Addendum. We appreciate the opportunity to submit these comments. If you have any questions about this filing, please contact Stephanie Chase at [Stephanie.Chase@atg.wa.gov](mailto:Stephanie.Chase@atg.wa.gov).

Sincerely,



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