



3/30/2017

Comments on UE-160799 Draft Policy Statement

Submitted by Jeremy Smithson (jeremy@evsupport.com)

Thank you for the opportunity to submit these comments.

In answer to the five specific questions:

1) In RCW 82.08.816(c) “electric vehicle infrastructure” has a pretty broad definition that includes more than just ‘charging stations’, but a utility won’t own the wires and conduit on the customer side of the meter, so “EVSE” should be limited to the charging station itself. It doesn’t seem that would preclude a utility from subsidizing the other parts of the whole system, though.

As a ‘manager’ of EVSE, the charging station (as in paragraph 75) would not necessarily be owned by the utility, so would responsibility for maintenance fall on the customer, or is that part of the management arrangement?

2) The situation of the EVSE portfolio will determine, to some extent, how to ‘balance’ the portfolio. For example, in an area that is dominated by single family residences, there may not be as much need for DC fast charging (DC fast charging is highly desirable for those who can’t charge at home). In high-density areas where there are lots of multi-family dwellings and parking space is a premium, DC fast charging often makes more sense than Level 2.

3) Interoperability is key to encouraging EV adoption. Just as service station credit cards have been supplanted by general use credit and debit cards, the wad of RFID fobs that an EV drive must carry around should also be supplanted by a universal system.

4) The Commission may have to serve as ‘referee’ between the various competing charging networks as they are tending to duke it out with each other for market share. This counterproductive competition must come to an end, and it may be that a set of standards for utility EVSE could be a tool to help make that happen, and the sooner, the better.

5) A single stakeholder group is probably the best way to equitably forge a framework for utility EVSE programs, but it may be messy and a bit protracted.