

Interested Party Comments and PSE Response

<u>Schedule</u>	<u>Summary of Comment(s)</u>	<u>Comment(s) Incorporated into Tariff filing; Yes, No, or N/A?</u>	<u>PSE Response</u>
ChargePoint, received on April 3, 2023			
551	ChargePoint recommends that Schedule 551 be revised to make the Host-Owned Workplace Charger program the default incentive option for all customers except Equity-Focused customers, who should be eligible to choose between the Company-owned option and the Host-owned option.	No	As discussed in <i>Attachment A - Stakeholder Comments</i> , which PSE included in its initial filing of its Phase I programs under Docket UE-220294 on April 26, 2022, PSE developed the EVSE incentive models based on customer feedback and inputs. PSE believes this structure provides the desired flexibility for the host to choose the option (customer-owned or Company-owned) that works best for them. The Company-owned cost structure is higher given the capital and operating investments PSE must make to install, own and maintain the EVSE for the term outlined in the Schedule as opposed to the host-owned EVSE where PSE will have no tangible rights to or requirement to maintain said EVSE. Additionally, PSE understands that hosts may choose to access State and Federal grant funding to further defray expenses, and may also be eligible for credit generation as the EVSE owner under WA State's Clean Fuels Program. For these reasons PSE feels the proposed design offers options while ensuring a level of parity.
551	ChargePoint recommends that the language in Schedule 551 regarding pricing restrictions for Host-Owned Workplace chargers be eliminated, as it does not comply with Washington state law.	No	PSE has reviewed applicable WA laws and policies, and does not find that the restrictions conflict. Further, PSE is committed to further promoting equity in its TE Programs. The intent of this language is to promote cost parity whether an EV driver is charging at home or at the office because they do not have access to charging at home.
551	PSE will cover 100% of the EVSE installation cost (up to \$12,000 per charging port) for the Company-owned workplace charger option. What happens if the cost to host EVSE exceeds \$12,000 per port? Would PSE forego installing chargers there, or would the customer be required to pay the additional costs?	Yes	The customer will be responsible for the additional costs that exceed the tariffed allowances. To clarify this point PSE will add verbiage to section 5 of Schedule 551, as well as sections 5 and 6 of Schedule 552 to mirror the Commission approved language in schedule 555 that states "The Host will be obligated to pay for the line extension and EVSE installation costs in excess of the [Schedule #] allowance under the Company's Schedule 85".

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All Schedules in this filing	When will stakeholders get a sense of the expected budget allowance for each program offering?	N/A	PSE believes the expected funding for the electric tariff schedules submitted in this phase II filing will closely align to the estimate spending bands enumerated in table 6 shown on page 69 of the Company's Commission acknowledged Transportation Electrification Plan. As stated in the cover letter included in this filing, the costs for the revised existing and new electric service schedules proposed in this filing will be recovered through Electric tariff Schedule 141TEP – Transportation Electrification Plan Adjustment Rider, and PSE will file updated rates for investment in 2024 and beyond as appropriate
All Schedules in this filing	What definition for “Equity-Focused customers” is PSE using to determine eligibility for its incentive offerings?	N/A	Schedule 583, which was approved by the Commission under Docket UE - 220294 on May 26, 2022, and effective June 1, 2022, provides the definition for Equity-Focused Customers as 'a customer that is part of Named Communities or a Customer that shares demographic characteristics with Customers in Named Communities' and the Community Based Organizations (CBOs), government agencies and tribal entities that serve them'. Schedule 583 also includes definitions for Named Communities for reference.
551	For the Host-owned option for public and workplace chargers, would PSE require customers to select equipment from an approved products list (APL)? If so, what requirements must equipment meet to be eligible?	N/A	Equipment requirements will evolve with the market, however, the main requirement is that PSE has data integration capabilities with network service provider so that we can receive load data and to aid in enrolling customers in existing or anticipated load management programs.

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Northwest Energy Coalition, received on April 6, 2023			
551 and 552	<p>NWEC is concerned that EVSE incentives could be used to subsidize EVSE supporting only one vehicle make, reducing broader market access. Recommend updating language so that program EVSE (PSE- and Host-owned) is accessible for all EV makes and models.</p>	Yes	<p>PSE has updated sections 4, 5 and 6 of tariff schedule 551, and sections 5 and 6 of tariff schedule 552 to include the following language "EVSE and network service provider must be an open network". Additionally, PSE added a definition of Open Network in tariff schedule 583.</p>
551 and 552	<p>NWEC questions how PSE will ensure price transparency, ADA accessibility, multi-lingual accessibility, and multiple payment method options at workplace and multi-family EVSE supported by Schedule 551 and Schedule 552.</p>	N/A	<p>PSE is committed to meeting all state rules and regulations. Our publicly available chargers will comply with California EV Standard § 2360 and 16-662 WAC (as required per SB 5192). For multi-family and workplace, they are exempt per RCW 19.94.555. Host-owned chargers are required to meet applicable rules and policies per the service agreements and may not be used to provide charging to the public.</p>
552	<p>NWEC is looking for additional clarification regarding single-family residential eligibility for equity-focused incentives. Greater qualification process detail is requested; i.e. self-verification or verified income threshold.</p>	N/A	<p>At this time PSE plans to identify 'customers that are part of Named Communities or a Customer that shares demographic characteristics with Customers in Named Communities', as defined in Schedule 583, by setting income thresholds for residential participation in these Empower Mobility programs at 200% FPL or 80% AMI, whichever is greater. This threshold aligns with PSE's upcoming Bill Discount Rate. To reduce barriers for these Equity-Focused Customers, PSE will only request self-verification of the participants' household income. No financial documents will be requested from the customer. As PSE's Bill Discount Rate is launched, PSE will further explore how to automatically qualify customers for its Empower Mobility program who are already qualified for the Bill Discount Rate.</p>

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552	NWEC requests additional information for the "load management, demand response, or time-varying rates" programs available to customers. Do these programs rely on Schedule 556 or are there additional Schedules?	No	This question has highlighted the need to update Schedule 556 in a future filing to exclude customers participating in PSE’s Small-Medium Business Time of Use with Peak Time Rebate (Schedule 324) from participating in the Load Management incentive detailed in 556. Once those necessary modifications are drafted, PSE will submit the proposed revisions to the UTC EVSE Stakeholder members to initiate a new 45 day review prior to filing those changes with the Commission prior to the anticipated October go-live date for the Small-Medium Business Time of Use with Peak Time Rebate program. Additional, new electric service schedules for Demand Response, which will include an electric vehicle component, are currently being drafted by the Company and will be shared with the Conservation Resource Advisory Group prior to filing.
All Schedules in this filing	NWEC emphasizes the importance of consistent metric tracking and stakeholder reports.	N/A	PSE agrees and will provide reports and updates as detailed in its cover letter included in this filing.
All Schedules in this filing	NWEC requests that PSE provide a summary of all phase 2 tariff filing comments, questions, and PSE responses to stakeholders.	Yes	PSE has included as Attachment A to this filing this summary of the comments received from the members of Joint Utility Transportation Electrification Stakeholder Group, responses from PSE for each item raised by each commenter, as well as an indication of whether the comment prompted revisions to the draft tariff schedules.
Commission Staff, received on March 23, 2023			
551	Sch. 551. Section 1. (Availability): What is behind the shift from a 5- to a 10-year minimum term?	N/A	The revised minimum term is consistent with the term in years included in Electric Service Schedules 552 and 555, which were approved by the Commission on May 26, 2022. The 5-year term was intentionally shorter to align with the shorter-term pilots we previously introduced under this schedule in 2018 and 2019.

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551	Sch. 551. Section 4 (Host-owned, public EVSE): In this and other sections, the tariff refers to PSE’s “standards, equipment, and metering requirements.” Are those explicitly laid out in the tariff or another referenced resource?	No	The standards, equipment and metering requirements are not currently laid out in the tariff or detailed in another reference resource. As the transportation electrification market continues to mature, PSE anticipates EVSE and adjacent technologies will also evolve, which may impact requirements. The proposed language provides PSE the flexibility to continually assess and update such requirements to keep pace with the market, and to meet customer expectations. Upon approval by the Commission, PSE will develop and make such requirements available to customers as part of the program enrollment and application process, which may also include a qualified product list. These terms are consistent with the host obligations included in Electric Service Schedules 552 and 555, which were approved by the Commission on May 26, 2022.
551	Sch. 551. Section 7 (Customer information): What kinds of customer information is PSE planning to collect? What third parties is this information shared with?	N/A	Information related to the project and property including address, contact information, demographics of who is being served by the electrification project, and other relevant details that may impact installation or performance of the EV chargers. This information will be shared with PSE’s charger and installation service partners to ensure a successful installation. Through our service partner, PSE will also collect EV charging data, which may, in some cases, include identifiable information such as email addresses. Service partners receiving and hosting customer personal identifiable information are contractually obligated to adhere to PSE’s information security and non-disclosure requirements.

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552	Sch. 552. Section 6. (Host-owned, MF residence): What does it take for a multi-family residence to qualify as “equity-focused”?	N/A	As referenced in the definition of Equity-Focused Customer in Schedule 583, eligible multi-family residences are those that serve customers in Named Communities. At this time, through Empower Mobility from Up & Go Electric, multifamily properties that house predominantly low-income residents or Tribal communities are eligible for higher incentives for charging installation as well as incentives for electric vehicles to use in shared mobility programs. To qualify for these Empower Mobility incentives, applicants must demonstrate that at least half of the property units housing low-income and/or Tribal residents and that these households will be the ones using and benefiting from the installed EVSE.