



April 11, 2017

Steven V. King  
Executive Director  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 S. Evergreen Park Dr. SE  
Olympia, WA 98504-7250

RE: Draft Policy and Interpretive Statement, Docket UE 160799

Dear Mr. King:

King County and the cities of Issaquah, Mercer Island, Redmond, Shoreline, and Snoqualmie are commenting jointly on the Utilities and Transportation Commission's (UTC) Draft Policy and Interpretive Statement Related to Utility Investment in Electric Vehicle Supply Equipment. We are providing these comments as elected officials representing more than 2 million Washington residents, many of whom are customers of electrical utilities regulated by the UTC.

Confronting climate change and accelerating a transition to a clean energy economy is a top priority for our jurisdictions. Through the Growth Management Planning Council, 39 cities and King County have established shared, formal targets to reduce greenhouse gas emissions by at least 50 percent by 2030 and 80 percent by 2050. As members of the King County-Cities Climate Collaboration (K4C), we have committed to specific targets, including reducing the greenhouse gas emissions intensity of fuels for passenger vehicles and light trucks by 15 percent, and reducing overall vehicle miles traveled by 20 percent below 2012 levels by 2030. Currently, local governments representing more than 1.5 million residents have endorsed the K4C's Joint County-City Climate Commitments.

We appreciate the significant time and effort the UTC has spent in its investigation into the issues and topics related to electrification of the transportation sector outlined in the Draft Policy. Greenhouse gas emissions from the transportation sector account for the largest

component of Washington's total emissions; reducing these emissions, and reducing the levels of associated pollutants are of key importance to mitigating the effects of climate change and reducing health impacts on our communities.

We support the adoption of policies supporting transformation of the electric vehicle (EV) market through utility provision of EV charging services and a framework for regulating these services. As utilities deploy charging infrastructure beyond the current pilot phase, they will need to plan accordingly for charging loads while maintaining reliability of the grid. We agree with the UTC that utilities should not have to bear the responsibility of planning on their own; we would like to see state and local policy incorporated in long-term planning, and broader information sharing that can create synergies between public policy intent and system planning for the benefit of all.

We support a flexible policy approach that allows utilities and consumers to adapt to a rapidly changing technology environment and gives utilities the freedom to develop programs and services that best fit consumer demand, while allowing them to meet consistency and reliability standards. Development of flexible rate structures through time of use or other banded rates that allow for load sharing and battery storage could be used effectively to reduce costs and reduce overall greenhouse gas emissions. If utilities can structure rates to meet consumer demand, provide reliable service, and effectively use grid to reduce overall costs, they should have leeway to develop these structures.

We offer the following recommendations to strengthen the Draft Policy, and provide more equitable benefits to all utility customers.

**Rate of Return Criteria:** RCW 80.28.320 provides for an incentive rate of return on EV charging equipment that is installed and located where electric vehicles are most likely to be parked for intervals longer than two hours. This criterion leads naturally to installations at homes and workplaces. We encourage the UTC to think broadly about potential charging sites such as community centers, churches, parks, and retail locations that would create a more robust charging network, thus encouraging adoption of EVs. We also encourage the UTC to consider this policy in light of reducing barriers for electrification of rideshare and car-share fleets. These fleets provide essential mobility services, including first and last-mile connections that improve equitable access to transit services.

**Emphasis on access to EVs and infrastructure for low-income populations:** Low-income populations, often living near industrial areas or roads, are disproportionately affected by criteria air pollutants emitted from fossil-fueled vehicles. The policy and regulatory structure for EVs should ensure that low-income and impacted populations can benefit from the reduced noise and emissions of EVs. We encourage the UTC to consider a regulatory framework that incorporates input from impacted communities to address equity now and as the market develops.

Development of programs for transit systems: In 2016, Transit ridership across King County Metro and Sound Transit's services climbed to its highest levels ever, totaling almost 150 million rides in the King County area. King County operates Metro Transit, one of the largest transit systems in the country, with a fleet of 1,500 buses, 1,700 commuter vans, and numerous light and heavy-duty vehicles. In January of this year, King County announced its intent to purchase up to 120 all-electric battery buses by 2020. Each bus is projected to reduce tailpipe greenhouse gas emissions by 65 tons annually, the equivalent of removing 21 conventionally-fueled cars from the road. Coordination with the electrical utilities and the UTC to develop charging infrastructure, accommodate load growth, and establish rate structures is critical to ensure charging needs for battery buses can be met.

The Draft Policy is silent on programs and rates for public transportation fleets. We encourage the Commission to consider a policy structure that supports widespread electrification of transit and heavy-duty vehicles operated by the County and cities, taking into account the service needs of public fleets. Key factors to support this market's growth include charging infrastructure standardization, limiting the barriers to entry posed by demand charges, and allowing for flexible charging station ownership strategies.

King County and partner cities Issaquah, Mercer Island, Redmond, Shoreline, and Snoqualmie have a long term interest in the health and well-being of our residents. We thank the UTC for its leadership on advancing public policy goals of reducing greenhouse gas and hazardous air pollutants through wide-spread electrification of the transportation sector. We are ready to work with the UTC, utilities, and stakeholder groups to facilitate efficient electrification of the transportation system that advances Washington State and local government policy goals.

Sincerely,



Dow Constantine  
King County Executive



Fred Butler  
Mayor, City of Issaquah



Bruce Bassett  
Mayor, City of Mercer Island



John Marchione  
Mayor, City of Redmond

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A handwritten signature in black ink that reads "Chris Roberts". The signature is stylized with a long horizontal flourish at the end.

Chris Roberts  
Mayor, City of Shoreline

A handwritten signature in black ink that reads "Shari E. Winstead". The signature is written in a cursive style.

Shari E. Winstead  
Deputy Mayor, City of Shoreline

A handwritten signature in blue ink that reads "Matthew Larson". The signature is written in a cursive style.

Matthew Larson  
Mayor, City of Snoqualmie

cc: Sung Yang, Deputy King County Executive for Policy Planning and Public Affairs,  
King County Executive's Office (KCEO)  
Megan Smith, Director of Climate and Energy Initiatives, KCEO