

***Investigation into Policy Issues Related to the Implementation of
RCW 80.28.360, Electric Vehicle Supply Equipment
Docket UE-160799***

Comments Received by March 31, 2017

Portfolio Approach to EV Charging Services	
What is the definition of “Electric Vehicle Supply Equipment,” and how should the Commission consider ownership of EVSE as a factor to determine whether a utility serves as a “provider,” or “manager” of EV charging services?	
Puget Sound Energy	1) EVSE includes the charger, charging cord and plug, wiring necessary to supply power to the charger, any supporting equipment such as foundations, anchoring, or other directly supporting equipment. It is important to note that this physical equipment may be supplied by communications or software as well, which is integral to the operation of the EVSE. 2) PSE requests the Commission not establish a bright-line test such as outlined in the "provider" and "manager" models based on ownership at this point, but rather consider whether the business case for a program or portfolio of programs meets the market needs and provides public benefit.
ChargePoint	Adopt a definition of EVSE that include all or parts of a charging station installation from the “make ready” to the charging station hardware, its maintenance, and any software or network services associated with that station. ChargePoint recommends the Commission authorize the utility to incentivize the “make ready” and allow site hosts to own and operate their own equipment and services.
Climate Solutions	1) As light duty EVs represent only a small portion of the benefits, the Commission should adopt a broad definition for an EV. Similarly, in defining “EVSE,” there should be a wide range of flexibility at this stage for utilities to determine what types of investments will be most beneficial to their customers and for managing the grid. 2) Climate Solutions recognizes and supports the Commission’s flexibility for exploring various business models and ownership structures in order to identify effective frameworks, while preserving customer choice. Also, load control capabilities and grid management should not be limited to the provider model. 3) To truly promote competition, we must first ensure that the industry reaches a critical level of adoption in order to survive long-term. California’s and Oregon’s experiences showed that emphasizing too great on balancing the provider versus manager approach can complicate programs in a way that could stall progress. It is important to maintain flexibility at this time. Further, additional features, such as choice in charging station vendors, can also help facilitate a competitive market and customer choice.

Brian Grunkemeyer	1) It is a good start in Paragraph 75 of the draft rule to carve out a role for utilities as a “manager” of EVSE, for direct load control or demand response. The Commission should be more open to consider a Demand Flexibility program, consistent with Grunkemeyer’s previous comments; 2) TOU rates are not a complete solution for benevolent EV charging. Utilities will need to incentivize driver participation through some creative marketing and a matching incentive structure; 3) Pilots should begin immediately. Compared with their planned capacity, our utilities might be collectively short by one natural gas peaker in late 2019; 4) Utilities should be instructed to include an analysis of demand flexibility programs in future IRPs, starting with BPA’s electric hot water heater project as an example of load shifting’s economics. Additionally, the Commission should broaden the definition of energy conservation to include not just conservation of electricity and natural gas, but also of oil.
Drive Oregon	It may be difficult to make this determination as it will change over time. Virtually every EV has within it the ability to time charge to manage load, so this functionality does not necessarily need to be built into the charging equipment or the utility program. The Commission should consider supporting simple programs and rates that encourage L2 charging, particularly in this early market period.
Puget Sound Solar	In RCW 82.08.816(c) “electric vehicle infrastructure” has a 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?
Joint Automaker	The Draft Policy Statement seems to suggest that EVSE refers to the actual charging station hardware, which makes sense at this time. The CPUC defined EVSE as “the EV charger equipment as opposed to the supply infrastructure, which we refer to as the make-ready infrastructure” in a Commission Decision. The question of asset ownership is the subject of much debate, and the Commission is taking the right approach in leaving open the possibility of both utility and third party ownership. It is important to remain flexible at this stage.
The Energy Project	The definition of EVSE should be broad enough to allow the utility program to cover a variety of delivery alternatives and different types of vehicles. The more flexibility that is provided in the definition, the more ability the utility, working with other stakeholders, will have to design an effective program.
Pacific Power	1) Pacific Power proposes a definition of EVSE that includes, but is not limited to, the electrical conductors, service panels, conduits, and any other equipment external to the EV that provide a connection for an EV to a power source to provide EV charging. 2) It may be premature to establish “provider” and “manager” of EV charging services as the two main classifications; There may not be bright lines. Pacific Power suggests avoiding including labels for utility program types in Commission policy until a more robust catalog of utility program offerings is available. 3) The Company is concerned that required demand response could create an additional barrier to customer adoption of EV if customers lose confidence that charging will be available when needed. Until more is known about baseline charging patterns and the feasibility of non-intrusive demand

	response, program applications should address any peak load management components, but it should not be a requirement for a program to be considered fair, just, and reasonable.
Washington Environmental Council	1) Regarding the “EV” portion of the term “EVSE”, the use of the word “system” in RCW 80.28.360 implies an expansive definition, which should include forms of commercial and industrial ground transportation. WET also support the inclusion of aviation and maritime transportation sector technologies. 2) Regarding the “supply equipment” portion, any form of hardware, lines, and wiring assembled to provide charging for the above defined EVs should be included. In cases where this supply equipment is used to meet other loads besides EV charging, the portion of the investment serving other demand loads should not be eligible for an incentive ROR.
NW Energy Coalition	1) An expansive definition of EVSE serves the goals of HB 1853 in encouraging the swifter and wider transportation electrification. The “EV” portion should be construed broadly to include not just motor vehicles operate on public roads, but also industrial equipment. The “service equipment” portion should refer to any equipment installed specifically to provide charging services to EVs as defined above. However, to the extent that electrical distribution lines are installed or other investments are made for multiple kinds of loads, that investment should not be eligible for the incentive ROR, but should be treated the same as any other line extension for purposes of return on the utility’s investment.2) NWEC understands the distinction the Commission is proposing to draw between “provider” and “manager” of EVSE, but ownership is not the only factor relevant to such distinction. Another key element is the relationship with the end-user: If the EV driver pays the utility for the charging service, then the utility is the provider, and the rates must meet the criteria of being “fair, just, reasonable, and sufficient to recover the cost of the service.” If the EV driver pays a third party which is responsible for the installation and maintenance of the charging equipment, but the utility has some control over the nature of the service provided (e.g., load management), then the utility is a manager.
Avista	1) According to the National Electric Code, EVSE is defined as “the conductors, including the ungrounded, grounded, and equipment grounding conductors, the EV connectors, attachment plugs, and all other fittings, devices, power outlets or apparatuses installed specifically for the purpose of delivering energy form the premises wiring to the EV.” 2) In cases where the utility owns the premises wiring all the way from the meter to the EVSE, the Commission should consider the utility as a “provider” and regulate the allowed EVSE user fees. In cases where the utility does not own any equipment downstream of the customer meter, but provides ancillary services, it may be considered a “manager” of EV charging services. For cases where the utility owns the EVSE itself but not the premises wiring, the customer continues to pay for the electricity through their regular bills, and in the case of commercial locations may require user fees unregulated by the Commission. In this case, the utility may best be considered a “provider” of EV charging services.
What criteria should the Commission use to determine whether a portfolio is “balanced”?	
Puget Sound Energy	The overarching requirements of non-discriminatory service to similarly situated customers, consideration of costs and benefits, and submittals of sound business cases serve as the appropriate determinations of whether a portfolio is balanced. Because both customer needs and vehicle types are likely to change over time, what may constitute a balanced portfolio is likely to change as well. It is reasonable to expect that through information

	sharing, business case development, and program reporting, the utilities will gain more experience and offer better balanced portfolios of programs based on market needs.
ChargePoint	If the Commission modifies the Portfolio Approach per ChargePoint’s recommendation, then a balanced portfolio should include investments and incentives to different customer segments, including low-income customers. As with other conservation and customer programs of the utilities, investments should be evaluated to determine whether or not they would have happened anyways, with a goal of limiting free-ridership.
Climate Solutions	While Climate Solutions supports the Commission’s desire for utilities to have a balanced portfolio, it recognizes the risks of overcomplicating program design and is hesitant to recommend strict guidelines. Possible considerations include: 1) Geographic location – distributing EVSE across the utility’s service territory; 2) Dwelling location – distributing EVSE across different types of dwellings; 3) Income levels – the benefits of EVSE and transportation electrification are not concentrated in wealthy neighborhoods; 4) Business models – providing a range of rate designs and ownership structures; 5) EVSE technology – a mix of projects that meet the requirements of the incentive ROR; 6) Charging times – installing EVSE that are likely to be utilized at different hours of the day; and 7) Projected grid impacts – the projected benefits to the grid.
Drive Oregon	It is desirable for utilities to offer a mix of programs that include both “providing” and “managing” charging, but it will be difficult to determine criteria for determining whether a portfolio is appropriately balanced. It may be helpful to consider whether utilities are excluding programs of either kind, thereby creating “imbalance.”
Puget Sound Solar	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 (DCFC 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, DCFC often makes more sense than Level 2.
Joint Automaker	1) Joint Automaker cautions against being overly prescriptive at this time by strictly defining the “provider” and “manager” models, and encourages the Commission to remain open to a variety of program structures – both with and without utility ownership of the actual EVSE – so long as they meet policy objectives; 2) A well-designed portfolio approach should capture the substantial grid benefits that transportation electrification can provide; 3) Rate design – rates should be simple, encourage electrification, and help ensure that charging is done in a manner that benefits the grid; 4) The portfolios and solutions should ultimately be judged based on needs, opportunities, and ratepayer benefits; It should anticipate future needs such as higher power DCFC and redundancy to meet growing demand. The question of whether a portfolio is “balanced” should be viewed through each of these lenses: market transformation, ratepayer benefits, and supporting a competitive market.
The Energy Project	A “balanced portfolio” will be one designed to reach a broad spectrum of residential customers, including low-income customers. To achieve this balance, the utility should include in its program criteria that verify that the program is designed to reach multiple “customer types” and a variety of locations, including: multiple housing types, residential locations, commercial locations, and government and social service agency locations.
Pacific Power	1) Pacific Power appreciates the Commission’s efforts to model electric transportation policies on those successfully implemented to acquire cost-effective conservation resources, but believes it is premature to

	<p>prescribe the breadth of utility involvement in transportation electrification. 2) At this stage, a “balanced” portfolio is one that addresses the most significant market barriers specific to a utility’s customer base and service area and provides data and learnings that can be used to inform future utility involvement in transportation electrification while minimizing costs to customers. Rather than prescribing specific program types that must be included in a “balanced” portfolio, Pacific Power recommends an incremental approach to utility portfolio development, with individual programs considered on their own merits when proposed. This program-focused approach will provide flexibility to prioritize programs that best meet the near-term objectives while allowing utilities to adapt to market changes. This approach also reflects that the state of, and market barriers to, transportation electrification are unique to each utility’s service area.</p>
ICNU	<p>The Commission’s portfolio approach to EVSE services seems appropriate, and if properly developed, the services would be sufficient to satisfy a variety of customer needs at a fair, just, reasonable, and sufficient rate. ICNU appreciates the Commission pointing out that such an approach is appropriate in light of the different customer types, market segments, and technology developments. As ICNU’s major concern is subsidizing EV charging benefits for other ratepayers, this approach should alleviate some of that concern.</p>
Washington Environmental Council	<p>1) Reducing carbon emissions and improving air quality are the two overarching principles that should guide determinations of whether a portfolio is balanced. Within this frame, WET agrees with the Commission’s expectation that utilities must provide fair access to services and competition in the provision of EVSE. The goal of improving air quality should be achieved by focusing on areas in our state with the lowest rates of compliance with mobile source air toxics rules. 2) In the early phases of implementing RCW 80.28.360, the Commission should adopt a flexible and principles driven definition of a balanced portfolio to allow EVSE investments to rapidly accelerate and related infrastructure markets to mature.</p>
Public Counsel	<p>Public Counsel agrees that the utility’s EVSE portfolio should contain offerings in which the utility is both the “provider” and the “manager”. Other elements necessary in developing and implementing a balanced portfolio include: 1) Allow and encourage a competitive market; 2) Require some form of load management program for customers; 3) Program(s) for the direct participation of low-income customers and/or communities should be mandatory in each utility EVSE proposal; and 4) EVSE proposals and/or individual programs will need to pass some form of a cost-effectiveness test or total resource cost test.</p>
NW Energy Coalition	<p>Balance between EVSE “provided” or “managed” by a utility is only one criterion. Additional forms of balance are important in evaluating an EVSE portfolio: 1) Geographic – EVSE should be well distributed across the utility’s service territory, in rough proportion to the population served; 2) Sectoral – since this is a pilot which will inform future utility investments in transportation electrification, installations should occur across diverse sectors of economy; 3) Socioeconomic – utility EVSE investment must provide access to electricity as a transportation fuel for populations across the socio-economic spectrum. 4) Provider vs. manager – NWECC agrees that a utility’s portfolio should be balanced by including significant elements of both utility-as-provider and utility-as-manager. NWECC is agnostic on Commission staff’s hypothesis that the provider model will be better suited to DCFC and commercial public charging, while utility-as-manager will fit better for residential</p>

	locations, private fleets, and sites off-limits to the general public (p. 32). The Commission should test its theory by allowing and encouraging a balanced portfolio in which both utilities and third-party providers can offer EV charging services to all customer classes if they wish. The Commission is also right to mandate the collection of data on capital and operating costs, utilization, and load management benefits, as described on p. 14.
Avista	The primary criteria should relate to the specific nature and state of EV adoption in a given service area, i.e. a “balanced” portfolio is one that best serves customers, all things considered. Greater complexity and costs associated with offering a wide spectrum of EVSE products and services must be balanced with what is most cost effective and likely to be useful and/or utilized, given the state of EV adoption for a specific area.
Interoperability	
What specific policies should the Commission adopt regarding interoperability of utility-owned charging infrastructure? We expect that both the EVSE hardware developed by the manufacturers and the software and communications components to continue to advance and develop rapidly over time. Accordingly, how should the Commission ensure that EV owners are not locked in to a certain type of technology (either hardware or software) as the market develops, and what role should the Commission have in assuring some type of backend interoperability between the EVSE at the hosting site and the operator of the overall EVSE systems?	
Puget Sound Energy	PSE considers interoperability in three ways: 1) hardware interoperability – there is both sufficient incentive and standard-setting activity to continue to improve. With regard to hardware interoperability of utility-owned infrastructure, the Commission should ensure that the utility has considered interoperability in its business case such that it has a plan to meet the needs of those market segments identified in the business plan, including hardware interoperability over the program life cycle. 2) Software interoperability – given the relatively small market and large number of hardware and software vendors, there is a risk that one or more of these vendors fail. The Commission’s role in helping mitigate this risk depends on who is purchasing the EVSE and software. For any utility programs regulated by the Commission, the standards of prudent decision-making would apply. 3) Customer experience – It has not been clearly defined and may vary by network or charging station manufacturer. To better inform all parties and begin, PSE suggests that a meeting of the stakeholders and all Washington State parties funding charging infrastructure with outside experts could be convened.
ChargePoint	Since there are now several competing efforts, it would seem best to seek or require “ <i>an open standard for communication between charging stations and their management system</i> ” rather than for the Commission or utilities to attempt to choose a winner, which is premature this point in time. A critical requirement is for any standard in this area to be developed in an ANSI-recognized Standards Development Organization (“SDO”), since only such an SDO can ensure the openness, lack of dominance, balance, IP protection, and coordination and harmonization that vendors need to participant and deliver the needed open standards.
Greenlots	1) The Commission should ensure that EV charging station hardware investments are not stranded due to software or network changes. For open communications to ensure interoperability between hardware and software, Greenlots recommends the Open Charge Point Protocol (OCPP), which is the de facto industry standard. The formal standardization of OCPP in the U.S. was ended due to repeated legal threats by

	ChargePoint, but most significant deployments are now requiring OCPP on both the hardware and software side. 2) The next level of interoperability at the hardware/software and system level is the facilitation of demand response and smart charging signaling. Utility needs to have the flexibility to choose its management platform for both “managed” and “provided” charging following an open and competitive procurement process. While transportation electrification is still in the early adoption stage, the ultimate platform managing these resources is and will be an integral aspect of a utility’s operations.
Climate Solutions	There are two major interoperability issues: ensuring that the charging station plug connects to the vehicle, and requiring network memberships with each charging station operator. On the first issue, standard J1722 is widely used by many automakers for L2 charging stations. But there are three main standards for fast chargers. Considering future advances in technology, adopting a specific protocol is not recommended. On the latter one, as suggested by Greenlots, Climate Solutions recommends the Commission identify specific characteristics that should be present in any standard or protocol in the future. A requirement for utilities to provide a means of payment that does not require a network membership, similar to PG&E’s practice, is recommended. Also, the Commission and utilities should engage with other stakeholders currently working on developing standards.
Brian Grunkemeyer	Perhaps the UTC can help protect consumers by ensuring some standardization. The simplest option would be to require a credit card reader on every L2 or L3 charging station, <i>unless the charging station provides free charging or back-end billing for at least some of their members</i> . The second case is to allow a private company with controlled access to a private parking lot to provide free charging, perhaps with utility money to support their needs or help offset some of the installation costs.
Drive Oregon	From a hardware perspective, the standard J1772 connector already offers widespread interoperability; on the fast charging side, however, SAE and CHAdeMO standards are both still in wide use alongside Tesla’s proprietary standard. The market place will resolve the issue. Drive Oregon recommends that any DCFC supported with public or utility funds should include both nonproprietary standards. From a software standpoint, EVSE funded with public or utility dollars should generally be open source following the OCPP. The Commission and utilities should engage with the EVSE industry and other stakeholders, and encourage a more rapid development of interoperability between charging stations. Since these standards will evolve in time, the Commission shouldn’t be prescriptive when describing which standards to use.
Puget Sound Solar	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 driver must carry around should also be supplanted by a universal system.
Joint Automakers	While the Commission should not necessarily define a specific protocol or standard for backend interoperability, it could be helpful to define characteristics that would protect ratepayer interests. Requiring interoperability analysis to be included in utility proposals as suggested in ¶ 87 is a logical step that would help the Commission and stakeholders continue to work through these issues.
Pacific Power	There are two distinct interoperability issues at hand: how drivers interact with EVSE and the interface between EVSE hardware and back-end systems. On the first issue, Pacific Power does not believe it is necessary for the

	Commission to adopt policies regarding interoperability at this time, rather, utilities can describe plans to address interoperability and stranded asset risk in program applications.
Washington Environmental Council	It is crucial for EVSE infrastructure to serve different charging connectors that work for all EVs in service. The Commission should adopt policies that optimize the functionality of EVSE infrastructure. The Commission is on the right track by requiring utilities to include an interoperability analysis in their EVSE build out proposals and by planning to make interoperability a key component of its analysis of programs.
NW Energy Coalition	1) Regarding the hardware to connect to EVSE to EVs, the reigning standard for L2 charging is the J1772 connector, which can charge all modern EVs. However, there are three different plug styles in use for DCFC. It will provide the greatest functionality for all utility-supported EVSE to include connectors that will work for all EVs. 2) For the hardware and software on the back end, the system benefits increase dramatically with the utility’s ability to practice load management and demand response through the EVSE. NWECC urges the Commission to require that connectivity and hardware be put in place that accommodate communication protocols which make the EV charging load dispatchable within the parameters set by the EV driver, or that communicates dynamic electricity pricing to the end-user in real time. Although a universal standard does not yet exist, the Coalition believes that in the meantime, some communication system such as is available through Open ADR2 or the Open Vehicle-Grid Integration Platform ³ being developed by EPRI—is an essential ingredient of EVSE that is supported under this incentive rate of return in order to achieve the “real and tangible benefits for ratepayers” that are envisioned in RCW 80.28.360 (3).
Avista	The Commission should require utilities to deploy EVSE systems that are interoperable, utilizing open communication protocols between EVSE hardware and backend software platforms.
What policy mechanisms or standards are available to promote system-wide interoperability for drivers, such that EV drivers can charge any EV model and pay for the charge without joining a multitude of charging networks? Does the Commission have a role in overseeing the development of these standards of protocols, or should it provide guidance on the characteristics of an open EVSE system or a more common interoperable platform?	
Puget Sound Energy	PSE is not aware of any currently enacted standards in the US, though some other states and other countries are exploring or have enacted mandates for interoperability. The Commission does have mechanisms available to require that utilities use certain standards (through rule). However, it would be premature for the Commission to specify standards. PSE supports use of the stakeholder group. This path could include implementation of policies or rules to encourage or require interoperability.
ChargePoint	There are many informal specifications for roaming protocols and schemes, but very little experience with their use in practice. There are two notable SDO-backed projects: the NEMA Roaming Standards effort, which is mature and nearing publication; and a new IEC Working Group on “Electric Vehicle charging roaming service”. But it is premature to choose a winner. The Commission can play a critical role through encouraging the utilities to work with industry to develop the needed standards through the appropriate SDOs.
Greenlots	1) Interoperability is a common objective for most all players in the EV and EV infrastructure industry. But there are stark differences of perspective as to how best to achieve this capability. While this realm may seem a

	departure from what the Commission traditionally regulates, it is a critical aspect of building a network of EV charging infrastructure that protects ratepayer investment by maximizing the used and useful life of the hardware, and is open and equitable Washington ratepayers. 2) The Commission need not prescribe a standard or protocol, but can – and should – identify characteristics for ensuring open driver access to charging infrastructure deployed with ratepayer funds. This includes freedom from intellectual property and attendant royalties. As the U.S. market is at an early stage, Greenlots recommends convening a working group of key stakeholders to explore options within a framework of objectives and deadlines provided by the Commission.
Climate Solutions	The Commission has a role in encouraging and engaging with the industry on common standards and protocols. Climate Solutions highlights two main concerns: 1) Software – The Commission should require utility investments to use open source communications, such as software compliant with the OCPP, but not a specific protocol; 2) Data collection – to effectively use EV as a grid resource and incentivize driver behavior change, the utility must have in-depth insight into customer use patterns. A collection of data similar to California’s requirement to fully analyze and understand driving patterns and customer behavior is recommended.
Brian Grunkemeyer	For now, the Commission should stay away from requiring specific technical standards. If the UTC sees fit to lend support for a standard like OCPP without imposing requirements, that would be helpful. Allowing utilities to “pay up” for a better or more open back-end charging network is also a way to protect their investment.
Drive Oregon	Payment interoperability will facilitate more rapid expansion of the EV market, and it has been slower to develop than many in the industry would wish. Due to market forces, the Commission’s policy leverage could possibly do more harm if it seeks too strong a role. But it is appropriate to expect any EVSE funded with public or utility funds to provide a means of access that does not require a network membership or subscription fee.
Puget Sound Solar	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 sooner.
Joint Automaker	Joint Automaker agrees that drivers should be able to charge without having any pre-existing relationships with network operators. The Commission need not be overly prescriptive at this time, but there should always be a focus on simplicity and ease of access to enable mainstream market adoption. Barriers to charging access, whether they are subscription requirements or high roaming fees, will slow market growth.
Pacific Power	Making the EV charging experience simple will be key to enabling widespread transportation electrification. However, this level of system-wide interoperability will require coordination between all vehicle charging service providers. While the Commission’s influence may be limited by its jurisdiction, it can provide valuable policy guidance on preferences for characteristics that can minimize interoperability barriers for utility-owned or incented EVSE. Pacific Power recommends the Commission hold a stakeholder workshop to discuss the characteristics of an open EVSE system and how utilizes and government agencies can access EVSE network data for system planning purposes.
NW Energy Coalition	1) It is important that utility-supported EVSE have plug connectors that make it compatible with all current EV models. As for being able to pay for the charging session with maximum convenience, the answer is different

	<p>depending on whether the utility is the provider or the manager of the service. If the utility is the provider, NWECA encourages the Commission to allow utilities to bill EV charging sessions to the EV driver’s home or business electrical account; If the utility is merely the manager and a third-party provider controls the EVSE, the Coalition does not take a position on whether third-party providers should be required to offer interoperability.</p> <p>2) The Commission should encourage EVSE manufacturers, automakers, and utilities to converge on a common standard or protocol, but should leave the particulars to them, provided to protocol makes possible two-way communication for the sake of demand response, load management, and dynamic pricing.</p>
Avista	<p>To the Company’s knowledge there are no currently available protocols or standards employed in the U.S. to promote system-wide interoperability, other than the use of credit cards. Credit card swipes are universal but add costs in equipment, fees, and maintenance. The Company would welcome any policies that could be effective in promoting this important benefit. Further consultation with industry experts such as those at EPRI and the California Air Resources Board (CARB) might provide more insight on how the Commission could serve in helping to develop and/or support standards and protocols, and/or guidance that specifies characteristics of an open EVSE system, seamless driver mobility and common interoperable platforms.</p>
Stakeholder engagement	
The Commission requests feedback on its proposed policy allowing for a single joint stakeholder group to participate in review of utility EV charging service program design and review.	
Puget Sound Energy	<p>PSE supports a joint stakeholder group to assist with more efficient operations and dissemination of information. It is important to clearly identify that this group is to share information, not to judge utility program design.</p>
ChargePoint	<p>ChargePoint supports the establishment of a working group that includes all participants to the rulemaking, and looks forward to working with all stakeholders on the development of future utility programs.</p>
Climate Solutions	<p>There is significant expertise in a rapidly changing field. Climate Solutions supports a single stakeholder group, but recommends that it remain open and flexible to allow for additional participants to join at a later date.</p>
Drive Oregon	<p>Supports the Commission in convening of a single joint stakeholder group among the three electrical companies for input and information sharing.</p>
Puget Sound Solar	<p>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.</p>
Joint Automaker	<p>Joint Automaker generally agrees with the Commission’s recommendation to create a single joint stakeholder group. This should reduce administrative burden and enable greater stakeholder participation. However, the Commission should not delegate decision-making/approval authority to it. Joint Automaker’s experience in California suggests that the discussions can provide input, but it is not realistic to expect consensus on all issues.</p>
The Energy Project	<p>Comfortable with the proposed policy for a single joint stakeholder group to participate in utility EV charging service program design and review. The Energy Project supports the requirement that the utility share specified information about its proposed program at least 60 days in advance of filing. The Energy Project recommends that the list be revised to include a specific description of the utility’s plans for meeting the “carve-out” requirement in the Policy Statement for deployment that benefits low-income customers.</p>

Pacific Power	1) The Company is supportive of a joint transportation electrification stakeholder group to provide the same function the Company’s DSM Advisory Group. The group would provide input on key aspects of transportation electrification programs, but would not need to reach consensus before a utility proposes a program. The group should include Commission staff, Public Council, WSDOT, and low-income and environmental advocates; however, the Company does not support inviting all commenters on this rulemaking, as it would be counter-productive for this group to become a forum for advocacy of their particular business models. Rather, if advisory group members request input from industry, public utilities, or other market actors on specific topics, representatives could be invited to present at advisory group meetings, if needed. 2) The Company does not believe that a 60-day review period is necessary and suggests adopting the 30-day period used for conservation filings; it also believes that customer agreements and RFPs or information should be removed from this list, as they are unlikely to be fully developed before the regulatory review and approval process begins.
ICNU	ICNU appreciates the Commission opening this process to public comments. ICNU requests that the relevant utilities share the information cited as part of the stakeholder engagement program in the Draft Policy.
Washington Environmental Council	WEC supports the creation of a single joint stakeholder group. It would be useful from a learning and information sharing standpoint for stakeholders engaged in EVSE build out to meet as one entity. The benefits could allow for best practices to become more easily shared and ensure greater interoperability of EVSE.
Public Counsel	Public Counsel supports a single joint stakeholder group for EVSE planning and the 60-day review period for EVSE proposals. In terms of the depth, Public Counsel believes this process would benefit from a similar practice as the Conservation Advisory Groups pursuant to WAC 480-109-110.
NW Energy Coalition	NWEC supports the creation of such a joint stakeholder group. This configuration has the potential to accelerate learning across different utilities’ service territories, which is especially important at this early point in the deployment of charging infrastructure. It could also facilitate greater interoperability.
Avista	The Company supports the concept of seeking input from a joint stakeholder group on future EVSE programs ahead of formal filings. Avista recommends that the draft policy recognize that the stakeholder group may not fully agree on the design elements and reporting requirements of a future EVSE program, but this should not limit a utility’s ability to move forward with a filing to the Commission.

General/Additional Issues	
Puget Sound Energy	
Areas PSE Supports the Policy Statement as Currently Drafted	1) Utility participation is in the public benefit – PSE appreciates the Commission's recognition of this intent; 2) Flexibility in program design over time – The Commission's approach of relying on a business case evaluation to ensure that benefits are commensurate with costs provides the right framework.

Areas Where PSE Seeks Additional Clarity in the Policy Statement	<p>1) Stakeholder group - PSE agrees that stakeholder coordination is important for many reasons. However, there are several areas where the policy statement could provide additional clarity; it is important to make clear that the role of a stakeholder group is for communication and coordination, and not for the approval of utility programs. PSE suggests that the stakeholder group be established soon. 2) "Provider" versus "Manager" – Given the evolutionary nature of EV charging infrastructure, PSE suggests the Commission decide each program and portfolio of programs based on its merits, rather than try to specifically classify programs as "Provider" or "Manager" at this time. For ratemaking, strict adherence to cost based rates for specific programs could create a barrier to utilities providing needed charging infrastructure. 3) Regulation of Utility Programs and Costs and Benefits – PSE appreciates the Commission's attention to the importance of maintaining balance between costs and benefits, while recognizing that costs may sometimes be incurred before benefits accrue. It is appropriate for the Commission to consider both the direct and indirect benefits of transportation electrification.</p>
ChargePoint	
EV Charging as a Regulated Service	<p>1) ChargePoint generally supports that electrical companies may offer EV charging as a regulated service with Commission approval. The criteria to evaluate these investments should focus on whether these investments are “used and useful” and can demonstrate quantifiable benefits to ratepayers. Also, the quantification of benefits that any EVSE investments deployed through the utility should ensure that installed equipment be able to provide broader benefits to the grid through networking and load management capabilities, to enable data collection on system utilization, managed charging, and demand response. ChargePoint supports that rates for EV charging services should protect non-participating ratepayers as well as fairly compensate EV drivers for the benefits they provide. The utility should also establish TOU rates for residential customers to encourage charging at certain times of day that are most beneficial to the grid. 2) Clarification to item 32 in the Draft Policy Statement regarding the “competitive market” for EV charging services: ChargePoint recommends the Commission consider a broader definition of effective market competition that is not necessarily constrained to geographic regions. 3) ChargePoint supports the determination that utilities be able to earn an incentive ROR on investments in EVSE as long as they meet the requirements of RCW 80.28.360, and specifically recommends that the Commission clarify that utilities be able to earn a ROR on financial incentives offered to customers to purchase EVSE. 4) The Commission should consider requirements to mandate the utility to develop a program that is efficient in terms of utility funding, utility actions and utility interaction with the site hosts. 5) ChargePoint reiterates the need for the clarification around the apparent limitation of utility investment in DCFC infrastructure due to the two-hour minimum parking requirement.</p>
Policies to Improve Access to and Promote Fair Competition in the Provision of EV Charging Services	<p>1) A cornerstone is to ensure that as the utilities make any investments in this market, that customer choice of hardware and network services and fair market competition are not just protected, but promoted in a way that encourages utilities and EV charging service providers to work together to maximize the benefits to all ratepayers. 2) ChargePoint recommended that the Commission adopt a definition of “fair competition” that included requirements for multiple hardware vendors AND network operators to be qualified into all utility investments and allow customer choice in the equipment, services, and pricing to drivers for all stations located</p>

	<p>on customer property. 3) Price signals should be sent to the utility customer of record, the site hosts, both residential and commercial, of the EV charging stations, as opposed to the EV drivers directly. 4) The Portfolio Approach provides rigid and prescriptive definitions around these two models, and leaves little room for innovation from either the utility or market participants, totally ignoring market dynamics. ChargePoint strongly recommends modifying the “provider” model to allow more flexibility around the business model that the utility would propose. The “manager” model should be expanded to ensure that customers have a choice in not only equipment, but in their network service provider as well. ChargePoint believes strongly that fair competition and customer choice should not be defined as limiting a customer’s choice to either utility ownership and operation of the station, or some predetermined third-party network provider. Additionally, utilities should be given flexibility to propose business models that support working collaboratively with industry to provide innovative solutions to customers, and this should include allowing the utility to earn a rate of return and investments to provide rebates to customers for the purchase of EVSE equipment.</p>
Climate Solutions	
Emphasis on Grid Benefits	<p>Strategic deployment of EVSE provides an opportunity for demand response, peak load-shifting, renewable integration, and mobile storage capabilities that saves all customers money. Analysis on grid benefits should not be limited to the technology in various types of meters, but also to the location impacts of such infrastructure. However, the benefits should be more broadly defined for prudence determinations. It is clear that societal benefits were an underlying goal of HB 1853. Utilities should be permitted to consider the full range of economic and social benefits when evaluating the cost-effectiveness of EVSE investment. While it is complicated to put a value on social costs, Climate Solutions recommends the Commission consider analyses by the federal DOT (TIGER Benefit-Cost Analysis Resource Guide) and the IPCC.</p>
Transportation-specific Rate Design	<p>Because we are at an early stage and have a limited understanding of which rate designs will be effective, the Commission should encourage utilities to offer a variety of rate structures in their programs, providing customers with additional choice and creating an opportunity for comparative analysis on the effectiveness of multiple rate designs. To maximize deployment, Climate Solutions recommends that the Commission and utilities examine how rate design can maximize benefits to the grid, and maximize fuel cost savings to drivers.</p>
Importance of Planning	<p>Climate Solutions supports including transportation electrification planning scenarios in utility IRPs. Utilities should actively examine commute patterns and incorporate various electrification penetration scenarios to determine the optimal locations of infrastructure.</p>
Low Income Carve-out	<p>Climate Solutions applaud the Commission for acknowledging the importance of ensuring that benefits flow to low-income communities and support the requirement for utilities to include a low-income carve-out. Given the wide range of potential benefits, the Commission should provide additional guidance to utilities on how the carve-out should be structured, and along with utilities, directly engage with low-income communities in order to identify the most beneficial projects for each utility service territory.</p>
Education and Outreach	<p>As utilities design transportation electrification programs, the Commission should encourage an active engagement and outreach strategy that encourages EV adoption and clearly communicates rate design changes.</p>

Brian Grunkemeyer	
Promoting Corridor Charging	Addressing range anxiety for long trips requires a robust corridor charging network throughout our state. Both ChargePoint and EVGo in California identified the biggest barrier as utility demand charges, which serve two purposes: recovering costs for peak capacity needs, distribution system upgrades, and ancillary services, and encouraging people to rearrange their schedule to match the needs of the utility. For corridor charging, the first applies but the second does not. The UTC should prohibit utility demand charges for corridor charging stations, and possibly all L2 charging stations.
Allowing Sales based on Energy, Not Time	The Commission should adopt a policy of allowing EV site hosts to bill based on energy sold, even if they are not a utility. Time-based billing runs into problems when you think about DCFC and overnight uses of L2 chargers. The Commission should decouple the notion of an electricity reselling business from a utility in order to not accidentally limit charging station innovation, deployment, useful adoption, and future business models.
Two Hour Rule	Grunkemeyer encourages the UTC to downplay distinctions between stations designed for charging for 2 hours or more. There is a qualitative difference between corridor charging and the other charging patterns, but that line is already slightly blurry and may disappear over time.
EV Load Estimation in IRPs	Utilities should be required to estimate EV morning & evening peak load impacts in their IRPs, which will be hard to do accurately. NWPCC has a well-developed top-down model for EV adoption within the state which fits with current future projections, but it is imperfect. Another approach is to measure EV load directly.
Market Transformation, EV Charging Services, and the Software Industry	Care must be taken to ensure the Commission doesn't accidentally grant a utility a monopoly over a charging network, but also that the Commission protects from monopsony power. The future of the utility industry is software and Big Data used to mediate power generation, energy storage and consumption together in real time. The Commission should consider mandating further utility pilot project participation, and provide an incentive ROR for potentially transformational pilots, with an eye to signing sizable commercial contracts for the right services within two years.
Drive Oregon	
Used and Useful	This standard should be very easy to meet for EVSE at this point. It is important to note that increased transportation electrification has many benefits to Washingtonians: 1) direct downward pressures on rates paid by all customers due to transportation demand that spreads fixed costs, provide grid services, and lowers the costs of integrating renewables; 2) it can drive EV demand, even if it is seldom used; 3) more widespread adoption of EV is critical to meeting Washington's goals for cleaner air and reduced climate pollution.
Two Hour Rule	Drive Oregon encourages the Commission to consider that the underlying statute governing incentive ROR may have been intended as a test of the equipment's usefulness, and should thus be measured in terms of <i>total amount of time there is a vehicle parked there</i> , rather than the amount of time <i>any single vehicle</i> is parked there.
Low Income Customers	Drive Oregon strongly supports the inclusion for low income customers; but disagrees with the notion "low-income customers are less likely to have access to an EV...", and strongly encourages the Commission and utilities to work closely with stakeholders – particularly low income community groups, automakers, car dealers, and mobility providers – in designing programs that will benefit low income customers.

The Energy Project	
Low Income Customers	1) The Energy Project strongly supports the Commission retaining this requirement in the final policy statement as a matter of regulatory fairness and equity. Deploying EVSE to benefit low-income customers and communities is essential to meeting the requirements in RCW 80.28.360; 2) One area for future discussion among stakeholders may be the approach, employed in some other jurisdictions, of establishing a specific percentage target or requirement for the carve-out. While The Energy Project did not recommend a specific percentage, one California program included a defined level of 15 percent deployment in disadvantaged communities; 3) The goal of ensuring that low-income communities see tangible benefits as a result of investment in EVSE infrastructure will be challenging for utilities without engagement from the agencies who deliver services to this population on a daily basis. The Energy Project hopes the Commission and utilities will be receptive to creative approaches that address the rates, charges, services and physical facilities for low-income service agencies as well as approaches that directly service low-income and senior customers.
Consumer Protection	The Energy Project agrees there may be a need for specific rulemaking as deployment expands and there is more experience with utility interaction with EVSE consumers. While it appears implicit in the Draft Policy Statement, it may be helpful to clarify the discussion in ¶¶80-83 to state more directly that the Commission’s consumer protection rules, summarized in ¶80, apply to EV charging when offered as a regulated service.
Reporting	The Energy Project sees value in the requirement that “[u]tility EV charging programs must include a comprehensive plan for regular reporting to the Commission on the costs and benefits of the program.” In addition to the items already listed, utilities also should report details of their deployment of EVSE pursuant to the required low-income carve-out, including but not limited to low-income locations served, percent of EVSE budget dedicated to low-income, and usage levels at deployment locations.
Education and Outreach	An education and outreach component is particularly important as a way to try to aid increased deployment to underserved areas and communities.
Pacific Power	
EV Charging as a Regulated Service	The Company is supportive of the Commission’s views on EV charging as a regulated service, and is particularly pleased by the Commission’s discussion to consider flexible pricing options. However, statements in the on Page 13&14 seems to presuppose that customers who are provided with EV charging services should be subject to separate rate and class treatment. Pacific Power suggests that it is premature to make this conclusion.
Calculation of Benefits	Pacific Power supports the proposed framework for assessing benefits (i.e., benefits to the electric system plus benefits that can be monetized by the utility) of transportation electrification, but cautions that the range of potential adoption levels resulting from a program is likely to be large, given the lack of utility EVSE program history (in Washington and nationally) to inform these projections. RCW 80.28.360 indicates that a program’s benefits to customers of a program need not exceed costs of the program, so long as net cost to customers is modest. Additionally, when assessing program- and portfolio-level cost-effectiveness, utilities should be allowed to exclude direct carve-outs to low income customers, consistent with the treatment of low-income conservation.

Low Income	While Pacific Power looks forward to helping low-income customers realize the benefits of transportation electrification, it does not believe that it is appropriate to require a low-income carve-out in all programs. The Company proposes modifying the relevant language to “Utility program applications should include a discussion of how low income increase access for low-income customers.”
ICNU	
Application of the Commission’s Ratemaking Procedures and Principles to EVSE Services	ICNU fully supports the Commission’s acknowledgment that regulated EVSE services should be subject to the general ratemaking statutes and principles applied to other regulated utility services. Further, EVSE services should conform to the promises made by its advocates – in all respects. In practice, ICNU urges the Commission to review EVSE investments using customary business-case standards, wherein both the costs and benefits are considered and compared with other like investments that would achieve similar goals. ICNU believes that Commission use of well-established methods of analysis to demonstrate both the cost-effectiveness and prudence of EVSE services will promote EVSE adoption.
Treatment for the Sale, Transfer, and Disposal of EVSE Property	1) While EVSE properties may fall below the threshold set forth in WAC 480-143-180 and WAC 480-143-190, it remains important for the Commission to audit the transfers of EVSE properties to ensure that such properties are indeed without service value to the utility; 2) ICNU supports the Commission’s proposed three-pronged approach set forth in the Draft Policy. Nevertheless, issues pertaining to asset sale, transfer and disposal, including appropriate valuation methodologies, are presently being contested in Docket UE-161204. ICNU respectfully requests, therefore, that the Commission consider erring on the side of caution in narrowing any discussion of generally applicable rules and statutory interpretation to only those statements strictly necessary to determine EVSE policy. In so doing, the potential for inconsistency, conflict, or simple uncertainty should be materially diminished.
Washington Environmental Council	
Accounting for the Social Cost of Carbon	WET believes the Commission should require utilities to include the social cost of carbon (SCC) in calculating the avoided costs of transportation electrification as directed by Governor Jay Inslee in Executive Order 14-04. WET also urges the Commission to consider the strong foundation of state law that exists for compelling state agencies to use their regulatory tools to address global warming. Recognizing the Commission’s role as a state agency regulating economic activity, WET believes the Commission has the authority to include the economically significant SCC in utility cost tests for EVSE programs.
Promoting Environmental Beneficial Electrification	WET agrees with Proterra that the Commission should promote ‘environmentally beneficial electrification’. Thus, WET does not believe the Commission should assign the same weight to increased load from EVs that produce benefits such as clean air as it does to load increases not due to EVs.
Public Counsel	
Consumer Protection	1) The development of consumer protections within the EVSE proposals is particularly important in meeting the requirement of fair competition in RCW 80.28.360(1). Public Counsel also agrees with the inclusion of the three options to the customer once an EVSE is fully depreciated, and proposes that these options be placed in the customer agreement for an explicit explanation of the “gifting” process at the end of the depreciable lift of the

	EVSE. However, these options may need to be amended as EVSE programs develop and technology changes. 2) The gap between the EVSE implementation and a possible rulemaking proceeding can be solved by stakeholder engagement in the EVSE joint stakeholder group, which may assist in developing solutions to any consumer protection issues.
Service Quality	Service quality standards should be created for EV charging services, regardless of whether the utility is the “provider” or the “manager”, although Public Counsel acknowledges that such standards may vary based on the utility’s role. The discussion may benefit from a collaborative setting and additional guidance.
Reporting Requirement	Reporting, and tracking requirements for EVSE are essential to proactively review issues related to participant behavior, reliability of the grid and infrastructure, and costs associated with EVSE. Public Counsel believes that it would be advantageous to add reporting of participation and direct benefits of low-income communities in EVSE. Furthermore, additional reporting of “real and tangible benefits” would be of value for a prudence review and potential cost recovery, as required by RCW 80.28.360(3). While there is no industry-wide agreement on the benefits of EVSE, Public Counsel expects that there will be further discussion and quantifications of these benefits, which should be included in regular reporting to the Commission.
NW Energy Coalition	
Just, Fair, Reasonable, and Sufficient Rates (p. 12-16)	In order to provide the greatest benefit to non-participating ratepayers, it is crucial that the utility embed price signals in its rates that will induce customers to engage in demand response and direct load control that reduce overall system costs. The rates charged (either directly to the driver, or to the host of the EVSE) should reflect the utility’s short- and long-term marginal costs, and be adjusted both with season and time of day. Likewise, the price incentives for accepting the utility’s signals for load management and demand reduction should be set so as to engage optimal levels of participation from EV drivers, with the aim of providing least-cost electricity service to the body of customers as a whole.
Demand Charges	The Coalition is opposed to residential demand charges, which are hard for homeowners and tenants to manage and control. In addition, demand charges for other sectors are ineffective at reducing system costs and unfair to ratepayers if applied to non-peak-coincident demand. For grid connections that serve a DC Fast Charging station — or even Level 2 charging locations that serve multiple vehicles — the potential exists for charging loads to cause the host’s demand to spike significantly.
Importance of Data Collection (p. 14)	The Coalition wishes to underscore a point made by the Commission: the rigorous collection of data on charger costs, utilization, and revenues will be essential in designing future EVSE programs and EV-specific electricity rates. In addition, it will be crucial to track customer response to the utility’s load management, demand response offers, and how charging is affected by dynamic pricing. Any utility program proposal should include a plan for how those data will be collected and furnished to the Commission.
Fostering A Competitive Market for EV Charging Services (p. 24)	The Coalition supports the development of a portfolio of charging services, some of which are provided directly by the utility and some by third parties. In order to maintain a level playing field between those two elements of the portfolio, it will be essential to ensure that tariffs for line extension and other make-ready work are fair to the third-party providers and do not create a market bias toward either segment of that portfolio.

Charging Service Portfolio Matrix (p. 32-33)	The Coalition appreciates the matrix of charging services and benefits presented at Table 2 on pages 32-33. NWECC offers this friendly amendment to the table's second row: where the utility is the provider of L2 charging for workplaces and fleets, there is every reason to believe that it could employ direct load control or at least demand response, thereby reaping the benefit of avoided costs as well as kWh sales.
Load Management (p. 33-34)	The Coalition shares the Commission's enthusiasm for load management as a component of EV charging services, and applauds the Commission for signaling that EV charging programs should include an element of demand response or load management.
Applicability of EVSE for Low-income Customers (p. 35-36)	The Coalition supports a carve-out for low-income customers. The benefits of transportation electrification – lower O&M costs, stability of fuel prices, cleaner air – should be made available equitably. However, NWECC would caution against dismissing the possibility that low-income ratepayers will want to own an EV outright.
Locational Value of EV Charging Stations	In designing a network of EVSE points, it behooves the utility to consider the places where installing EVSE will enable it to take advantage of underutilized distribution capacity, or where it can locate EV charging on the upstream side of a transmission bottleneck, so as to minimize the new investment in transmission and distribution made necessary by EV loads.
Avista	
EV Charging as a Regulated Service	The Company agrees that the Commission has drawn the correct conclusion and fully agrees that the Legislature's findings regarding the utility's role in the electrification of the transportation system are a principle building block on which the policy statement should be adopted. 1) The used and useful standard – Avista agrees that retaining flexibility in applying this standard to EVSE investments on a regulated basis is the best approach; 2) The evaluation of benefits to customers – it requires flexibility as many of the benefits customers realize may be different in both the form and timing compared to more traditional infrastructure investments; 3) Knowledge and information – any request to recover EVSE investments should be accompanied by sufficient data and analysis along with a business case for why the utility chose to make the investments; 4) EV charging rate – the question of the proper rate design will be carried through to future program design and review. Avista appreciates the Commission's discussion of banded rates for future EV charging services. Rather than making a tariff filing each time the rate needs adjustment, a banded rate option would allow greater flexibility; 5) EV charging equipment and the sale, transfer, and disposal of utility property – Avista agrees that the Legislature provided a clear directive that utility investments in EVSE may be gifted at the end of its depreciable life. The analysis of RCW 80.28.360, 80.04.270, 80.12.020, and 80.12.030 in the draft statement is informative, but may not be necessary. The Company requests that the Commission consider removing the provision that gifting of EVSE will be determined on a case-by-case basis; 6) Eligibility for the incentive ROR – The Company agrees with the conclusions drawn on the eligibility and application for the incentive ROR in the draft policy statement.
Policies to Improve Access to and Promote Fair Competition in the	1) Avista agrees that utilities are most naturally positioned to address the barriers of charging availability and consumer awareness, but not the sole entity needed. 2) A regulatory policy supporting a portfolio approach can help ensure that utilities offer such long-term programs in a way that is effective, flexible, and continuously improving, while appropriately promoting customer choice, innovation and healthy competition in the industry.

Provision of Electric Vehicle Charging Services	<p>3) The Company intends to include effective load management as a prioritized component of future EVSE programs. 4) Avista does not agree that low-income customers are not likely to benefit directly from access to EVSE during the market transformation phase. 5) Avista agrees that hardware and backend software interoperability should be a key component of utility EVSE programs. Utilities and other stakeholders should be required to develop and support interoperable systems that ultimately benefit and protect consumers, including among other things, using RFP processes. 6) Avista supports seeking input on future EVSE programs ahead of formal filings, but has some concern about inviting all parties who commented on this rulemaking to be a part of the stakeholder group. If the group is to review proposed utility programs and make recommendations to inform programs as described in the draft policy statement, then Avista suggests the core stakeholder group include representatives from Commission Staff, Public Counsel, WSDOT, low income advocates, and other state agencies and/or environmental groups. 7) The calculation of benefits is unavoidably sensitive to a wide variety of assumptions, therefore a range of plausible scenarios must be investigated. However, these calculations should be used to inform rather than unreasonably restrict program designs and approvals. 8) Avista requests the Commission consider issuing policy guidance that permits utility EVSE investments in areas other than for light-duty passenger EVs, commensurate with a reasonable interpretation of the HB 1853 legislation.</p>
King County and the Cities of Issaquah, Mercer Island, Redmond, Shoreline and Snoqualmie	
General	<p>1) King County supports policies that support transformation of the EV market through utility provision of EV charging services and a framework for regulating these services. For the benefit of all, state and local policy incorporated in the long-term planning, and broader information sharing would be helpful. 2) King County supports a flexible policy approach; 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.</p>
Rate of Return Criteria	<p>King County encourages the UTC to think broadly about potential charging sites that would create a more robust charging network, thus encouraging adoption of EVs. Further, rideshare and car-share fleets also provide essential mobility services, so reducing barriers for electrification in this sector should be considered as well.</p>
Access to EVs and Infrastructure for Low-income Populations	<p>Low-income populations are disproportionately affected by emissions from fossil-fueled vehicles. The UTC should consider a regulatory framework that incorporates input from impacted communities to address equity now and as the market develops.</p>
Development of Programs for Transit Systems	<p>Transit ridership across King County is very high. The Draft Policy is silent on programs and rates for public transportation fleets. King County encourages 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 include charging infrastructure standardization, limiting the barriers to entry posed by demand charges, and allowing for flexible charging station ownership strategies.</p>