



**Steve Henderson**  
Electrification Policy & Projects  
Sustainability, Environment & Safety Engineering  
Ford Motor Company

**Ford World Headquarters**  
One American Road, 207-A4  
Dearborn, MI 48126-2738 USA

November 16, 2018

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Subject: Ford Motor Company comments on Puget Sound Energy Filing # UE-180877

Dear Mr. Johnson:

Thank you for giving Ford Motor Company the opportunity to provide comments supporting the tariff revision request from Puget Sound Energy (PSE) under consideration before the Washington Utilities and Transportation Commission.

Ford is committed to improving fuel economy and reducing CO<sub>2</sub> emissions, and vehicle electrification is fundamental to meeting these commitments. Ford has led the way in vehicle electrification, introducing the Escape Hybrid nearly 20 years ago, and our Hybrid and Plug-in vehicles remain among the best sellers in the industry. We recently announced plans to invest \$11 billion to put hybrid and fully electric vehicle models on the road globally by 2022. In the next few years, Ford will offer full battery-electric vehicles and hybrid options on well-known nameplates such as Mustang and F-150 in addition to hybrid or plug-in hybrid options for every new Ford SUV introduced. The state of Washington has committed to an electrified transportation future and Ford is working towards these goals as well. Together we will enable a future that benefits both society and the environment.

In order to achieve a goal of mass EV adoption, substantial charging infrastructure challenges must be overcome. Customers still show reluctance in adopting plug-in vehicles. A principal challenge is the significant shortfall in EV charging availability and visibility.<sup>1</sup> We believe that electric utilities are in a unique position to assist in addressing this challenge, and we are gratified to see PSE's proposal advancing.

On February 21, Ford submitted comment (copy attached) to Washington's Department of Ecology Air Quality Program on use of Environmental Mitigation Trust Funds (VW Settlement Appendix D) on public charging spending. The recommendations made in our letter include expanded public charging infrastructure and DC Fast Charging in targeted, critical locations. These charger locations should focus on routine public destination and workplace charging. In addition, Ford recommends a coordinated state-level EV charging infrastructure plan, including coordination with other public and private EV infrastructure investments.

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<sup>1</sup> US DOE. National Plug-In Electric Vehicle Infrastructure Analysis (<https://www.nrel.gov/docs/fy17osti/69031.pdf>).


Home charging, both in residential homes and multi-unit dwellings, is also an important PEV adoption factor. Surveys of PEV driver behavior indicate that over 80% of PEV charging occurs at home. Efforts by electric utilities to offer assistance in the purchase and installation of home charging equipment have proven very effective.

Finally, Vehicle Grid Integration (VGI) offers the ability to provide grid services for utilities and value to our customers. We are glad to see PSE including OVGIP in its plans. Ford is utilizing OVGIP in utility pilot projects today and believes that it provides a great value proposition for utilities, providing EV data and energy services without the need for networked infrastructure.

PSE's filing is consistent with Ford's positions on public and residential charging infrastructure and VGI, and we support these first steps by PSE to help electrify our transportation system and reduce carbon emissions. We hope to see additional and larger programs from PSE in the near future.

Ford requests that the Commission consider and approve these programs quickly. If you have any questions, please feel free to contact me at shenders@ford.com, or at 313 322 4475.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Henderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steve Henderson  
Manager, Electrification Policy & Projects  
Ford Motor Company