

August 16, 2016

Steven V. King
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket No. UE-160799

Dear Mr. King,

The Energy Project (TEP) submits the following comments concerning Washington Utilities and Transportation Commission's ("Commission") Notice of Opportunity to File Written Comments issued on June 24, 2016.

TEP's comments pertain to the language in RCW 80.28.360, wherein it is stated that, "(1) The commission must consider and may adopt other policies to improve access to and promote fair competition in the provision of electric vehicle supply equipment." As a longtime advocate for low-income households in Washington State, TEP commends the Commission for their interest in soliciting comments specifically on how to improve access to electric vehicle charging as a regulated public service.

Our chief concern with the investment of ratepayer dollars in electric vehicle (EV) supply equipment and infrastructure is that while low-income households will most certainly be paying for the investment in any approved application of the technology, they will see very little in the way of direct benefit from it without some specific policy/policies addressing the unique issues that they face. For example, from TEP's perspective, access to EV equipment and infrastructure through ownership of a personal EV for a low-income household is unrealistic.

However, there are many ways that low-income households are helped through transportation based services such as Head Start, Medicaid Transportation and other income eligible services. TEP believes that low-income households can best be served by ensuring that EV equipment and infrastructure is available to low-income households through aligning EV equipment and infrastructure investments with these existing service infrastructures. We see this potentially being very beneficial in rural areas of the state where transportation needs for low-income households are critical.

the
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While TEP does not have any specific answers to the questions associated with how investments in EV equipment and infrastructure should proceed, we are dedicated to participating in the conversation and representing the needs of populations who face significant financial barriers to participating in and benefitting from EV infrastructure.

Sincerely,



Shawn Collins
Director, The Energy Project

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