



May 16, 2023

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission (UTC)
P.O. Box 47250
Olympia, WA 98504-7250

Re: PSE Tariff Filing for EV Charging, Schedule 551: Docket UE-230287

Dear Ms. Maxwell:

The Alliance for Transportation Electrification (ATE) is a 501(c)(6) non-profit corporation; the organization engages with regulators and policymakers at the State and local government levels to remove barriers to EV adoption and to encourage the acceleration of EV infrastructure deployment with a particular emphasis on open standards and interoperability. We consist of nearly 60 industry members that include electric utilities, auto and bus manufacturers, EV charging infrastructure providers, and related trade associations and other non-governmental organizations. The Alliance is engaged in PUC and other state agency proceedings in 25-30 states and jurisdictions today. We have been actively engaged in the excellent UTC stakeholder process and many of the utility filings for transportation electrification plans (TEPs) and tariff filings by utilities over several years.

The Alliance strongly supports the tariff filings of PSE across multiple use cases— single-family residential, public EVSE including commercial, workplace, and alternative technology pilots – in the current Docket UD-230287. Washington state has been an advanced leader in the states in encouraging the regulated utilities to file programs with a portfolio approach offering the customers and host sites with choices along with a robust utility role in support and grid integration. These programs have followed the broad directives of several legislative statutes and the Policy and Interpretive Statement adopted by the Commission in

2017. In addition, these programs and tariffs, and previous iterations have been vetted through the stakeholder process where parties have been able to offer comments and suggestions.

The Alliance believes that at this early stage of market development that a variety of business models should be tested in the EV charging marketplace, including PSE as the utility owning and operating the EVSE and electrical infrastructure on behalf of the customer, as well as what is called a make-ready approach in which the utility covers the electrical infrastructure while the customer purchases the EVSE and manages the customer's side of the meter. The relevant Washington statutes regarding EV infrastructure (ESHB 1853 in 2015 and HB 1512 in 2019, among others) set forth a primary role for the regulated utility ("utilities must be fully empowered and incentivized to be engaged in electrification of our transportation system") in seeding the early market transformation along with the private sector, local and state government agencies, and others. Hence, we believe that the tariff offerings of PSE are well designed and balanced and meet broadly the directive of both statutory direction from the Legislature and the path-breaking Policy and Interpretive Statement from the UTC.

First, regarding single-family residential charging products and services (Schedule 552), the incentives provided for single-family customers are reasonable and built on the previous work that PSE has done in this use case. Additionally, they provide a higher EVSE incentive as well as an installation incentive for equity-focused customers to help offset electrical upgrade costs for existing and older homes.

responsibility, they can do so and qualify for a lower incentive (up to \$2,000 per port) and do the work separately. Under both options, the incentives for equity focused communities are higher, which we believe is appropriate.

Second, for Schedule 551 covering non-residential charging both for commercial customers and workplace, we believe that PSE has developed a balanced and innovative approach that cover several use cases and geographies. Workplace charging has proven to be an important use case for many EV owners, and especially for those who don't have easy access to

charging at home whether that be single-family or multi-family. In addition, public DC fast charging has become a key barrier to higher EV adoption, and PSE's filing addresses this barrier effectively by offering the host site the choice of owning and operating the EVSE with an incentive, or for PSE to take on that responsibility itself (usually with a commercial vendor on a white label basis operating the network). We believe this is a good approach. In addition, the rates in the tariff for these public EVSE charging services are consistent with the previous rates charged by PSE-owned chargers, per tariff, and reflect the broad averages of market pricing by private EV service providers, including idle fees.

Finally, we think that PSE's proposal to advance technology demonstrations in a series of targeted programs is a progressive and forward-looking concept that should be supported. As a grid-edge distributed energy resource (DER), similar but different from other such resources, the utility with Commission oversight, and peer review from expert regional institutions and CBOs (community-based organizations), should keep a focus on vehicle-to-grid integration (VGI) technologies, including V2G applications, as well as other potential innovations in transportation electrification as well as off-road applications. Several other jurisdictions are moving forward in this area, such as Colorado, California, Maryland, New York, and others, and PSE and the Commission can reference those pilot programs and innovation as well. As EV adoption approaches hockey-stick type growth in Washington state and especially PSE's service territory (as outlined in its most recent TE plan), the battery capacity in light duty vehicles (at an average of 80 kWh per battery for a typical BEV) will be substantial. As medium and heavy-duty vehicle incremental loads, both for buses and trucks with battery capacities of 350 to 550 kWh, are added to this potential, this becomes a significant resource both for the benefit of the customer and for the utility through flexible load management techniques. Hence the Commission should support programs such as these to advance the state of knowledge in a practical way.

In summary, the Alliance urges the Commission to consider favorably these tariffs and program filings in this Docket. We understand that these have been vetted through the UTC Stakeholder process and have reached broad consensus, and therefore should be approved,

if possible, on the consent agenda without further litigation. We appreciate the opportunity to offer comments.

Sincerely,

Philip Jones

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