



NW Energy Coalition
for a clean and affordable energy future

September 18, 2020

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
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COMMISSION

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RE: NW Energy Coalition's comments regarding Avista's 2020 Transportation Electrification Plan, Docket No. UE-200607

The NW Energy Coalition (NVEC) appreciates the opportunity to provide comments on Avista's 2020 Transportation Electrification Plan. The Transportation Electrification Plan (TE Plan) includes a wealth of information and strong evaluation of current market conditions. We commend Avista's efforts to advance transportation electrification, especially Avista's plan to achieve 50% peak load reduction from light-duty EVs with net grid benefits by 2025. We believe several components of the plan are designed in a manner to provide long-term benefits to customers, but we recommend the Commission provide additional direction to Avista for the development of their subsequent transportation electrification (TE) programs and TE Plan reporting to help ensure investments benefit all customers.

Our summary recommendations to the Commission in this matter are:

- Require analysis and reporting, in addition to the proposed reporting metrics, on metrics that will help evaluate whether programs are equitably serving all customers.
- Ensure all investments in public charging infrastructure are accessible to current and future customers.
- Support direct customer and community input in the design of useful low-income TE programs.
- Encourage proactive distribution system planning, grid optimization, and demand side management to facilitate greater access to affordable energy and transportation options.

Analysis and Reporting

NVEC is comfortable with Avista's proposal to re-issue the TE Plan every 5 years, with the understanding that new program filings and interim plan reporting may and should be submitted on an on-going basis and that the mid-period report will provide comprehensive updates. Avista is still in the early stages of offering customer-side participatory programs to support the efficient integration of existing and new EV load and accelerate transportation

electrification in its service area. The early nature of the programs means that monitoring and reporting on these programs will help inform future, scaled programs. We offer the following metrics for some initial ideas, but we recommend Avista include a plan to set metrics through a participatory process.

- Stakeholder engagement – utility performance related to outreach to and participation of vulnerable populations in highly impacted communities as defined in the Clean Energy Transformation Act, low-income service providers, community-based and community service organizations, non-profit organizations, small businesses (particularly minority and women owned businesses), and tribes related to TE.¹
- Direct and indirect benefits to low-income customers. As a starting place, direct benefits could be indicated by a low-income customer or an entity directly serving low-income customers participating in a utility program and it resulting in cost savings, access to electric transportation technology, and/or an increase in reliable and affordable mobility due to utility TE investments. Indirect benefits could be indicated by low income customers experiencing better air quality due to avoided GHG pollution and/or downward pressure on rates associated with utility TE investments.
- Peak load curtailed and load shifted to off-peak periods as a result of demand side management program components.
- Avoided distribution and transmission costs and incremental renewable utilization resulting from demand side management program components.

It is critically important that investments are in the public interest and that programs result in an equitable distribution of benefits.²

Programs and Activities – Accessible Public Charging

As utilities increasingly support the use of electricity as a transportation fuel, investments in Public DC Fast Charging and AC Level 2 charging must be accessible to current and future customers. Public charging is an essential component to the acceleration of transportation electrification but not all public charging is accessible.

When a person goes to fill their car with gasoline, they know how much they're being charged and how much fuel they're getting, and they know there are several ways to pay, either with a card or cash. That's because the gasoline fueling system is standardized and regulated. Washington does not yet have standards and regulations for public charging infrastructure.

¹ [RCW 19.405.020](#)

² Due to [CETA](#), the public interest has been expanded to also include the equitable distribution of energy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health, economic, and environmental benefits and the reduction of costs and risks; and energy security and resiliency.

Without basic standards and regulations in place, consumers are at a significant disadvantage. For example, it may not be clear to the consumer how much they're paying for the charge they receive. They could be forced to pay more to charge an older vehicle that takes longer to charge. They may be forced to pay hidden fees, subscribe to memberships, or download certain apps to their phone, which raises numerous other consumer protection and equity concerns.

Future program filings should include comprehensive actions to ensure accessibility for all customers to utilize the infrastructure resulting from investments made with ratepayer dollars. This includes fair rates and restrictions on requiring membership fees. We encourage the Commission to review California's [Electric Vehicle Supply Equipment \(EVSE\) Standards](#) and [California's Electric Vehicle Fueling System regulations](#) and engage stakeholders to establish guidelines for what constitutes accessible public charging.

Community and Low-Income Support

Avista has a long history serving communities throughout eastern Washington. We encourage Avista to leverage these relationships to develop more equitable TE programs that align with Avista's commitment to dedicating 30% of program funds to low-income TE on an aspirational basis.³

TE investments must be useful to utility customers both to reliably and affordably support service as well as to effectively align with reasonable mobility options for customers. NWECC appreciates the inclusion of this section and we recommend the following:

- Avista should reach out to community based and community service organizations, low-income service providers, and those representing vulnerable populations in highly impacted communities to develop programs that provide direct and indirect benefits to low-income customers. Avista should resource these organizations for their time spent and expenses incurred in guiding the development of equitable TE programs. In addition, we encourage Avista to look at Puget Sound Energy's Low-Income program portfolio for scalable program ideas and to do further outreach to tribes to identify areas of opportunity.
- Avista should initiate a more proactive approach to support Spokane Transit Authority (STA) and other local transit agencies to help accelerate battery electric bus and shuttle adoption. Avista can further provide direct and indirect benefits to low-income customers by supporting (1) the prioritization of transit route electrification in communities experiencing the greatest environmental health disparities as indicated in Washington's Environmental Health Disparities Map and (2) transit agencies' efforts to expand service hours and routes due to sustained fuel and maintenance costs savings from TE.⁴

³ See UTC docket UE-190334, et. Al, Partial Multiparty Settlement Stipulation, pp. 11-12

⁴ <https://fortress.wa.gov/doh/wtn/WTNIBL>

- Providing EVSE and car-sharing programs to disadvantaged communities does not necessarily provide direct and indirect benefits to low-income and rural communities if additional barriers to adoption exist. We strongly recommend working with community members to identify mobility needs and design relevant and affordable program solutions.
- NWECC sees value in providing assistance to transportation network company (TNC) drivers to increase access to EVs and reduce costs. In considering any TNC programs, it is imperative that Avista seek direct input from TNC drivers and organizations representing the interest of TNC drivers. The TNC software application or platform providers do not necessarily represent the interests of TNC drivers.
- Selected projects should not compete with weatherization, efficiency, or bill assistance programs and should provide sustainable benefits to customers even in the event a pilot or program is terminated.

NWECC would like to continue working with Avista to support equitable program design and increase access to TE that distributes benefits to all of Avista's customers.

Distribution System Planning and Demand Side Management

NWECC finds Avista's distribution grid impact analysis interesting in that it is projecting higher costs associated with the need for additional generation capacity but minimal distribution grid impacts from TE. The distribution grid impacts scenarios are modeled under the assumption that EV adoption will be random and equally dispersed across Avista's distribution system, but EVs are typically found in clusters and it is likely that higher power fast-charging at future EV fleet locations will trigger location specific impacts to Avista's distribution system.⁵ We recommend Avista conduct a distribution system impact analysis that includes: (1) clustered electric vehicle charging scenarios; (2) targeted locations where large EV fleet and medium- and heavy-duty EV charging of greater than 1 MW is anticipated; and (3) strategies to couple TE demand side management with targeted energy efficiency and demand response. The analysis should be included in Avista's TE Plan reporting.

Additionally, we are encouraged by Avista's plan to achieve 50% peak load reduction from light-duty EVs with net grid benefits by 2025 and note that it is possible for Avista to significantly exceed this goal. For example, Xcel Energy's Minnesota residential electric vehicle charging pilot has consistently resulted in 93% of charging occurring during their off-peak period.⁶ We recommend the Commission strongly encourage utilities to pursue program design that supports grid and resource optimization, including demand side management.

⁵ <https://ieeexplore.ieee.org/document/8732007>

⁶ [Xcel Energy's Compliance Filing to the Minnesota Public Utilities Commission, Residential Electric Vehicle Charging Tariff, Docket No. E002/M-15-111, E002/M-17-817, AND E002/M-19-186](#)

Conclusion

NWEC appreciates Avista's work to develop this plan and we look forward to engaging in the development of Avista's future TE programs. We support Avista's TE Plan and encourage the Commission to provide further guidance for subsequent TE programs and TE Plan reporting to help ensure programs equitably serve all customers, investments are accessible, TE programs are useful to low-income customers, and proactive planning results in greater access to affordable energy and transportation options. Each recommendation will help accelerate TE market transformation.

Thank you for your consideration of NW Energy Coalition's comments.

Sincerely,

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