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Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**Re: WeaveGrid Response to Opportunity to File Written Comments, Docket UE-160799**

**I. Introduction**

WeaveGrid respectfully submits our comments in response to the State of Washington Utilities and Transportation Commission (UTC or Commission) *Notice of Opportunity to File Written Comments*, filed to Docket UE-160799 on March 17, 2025, and the *Notice Extending Deadline for Opportunity to File Written Comments*, subsequently filed to Docket UE-160799 on March 25, 2025.

**II. Description of WeaveGrid**

WeaveGrid is a software company that helps utilities support increased adoption of electric vehicles (EVs) through greater understanding of customer charging behaviors, managed charging programs, and distribution-level charging optimization. WeaveGrid's technology leverages utility and charging data, including embedded vehicle telematics—data, controls, and communication systems—and charging equipment data to transform unpredictable and disaggregated EV charging loads into a cohesive network of controllable grid resources. We also support utilities in engaging their EV customers with personalized messages, insights, and notifications via the web, email, and text. Our approach enables broad participation in utility programs, including vehicle-grid integration programs, while helping reduce the costs to serve EV loads. WeaveGrid is a market leader in providing these solutions.

### III. Written Comments

We appreciate the UTC identifying the role of various transportation electrification entities in its second workshop in this docket. UTC's initial comment notice summarizes the utility role as providing "Detailed the forecasting and modeling inputs used by each utility, monetization of CFS credits and any rate recovery considerations that may allow IOUs the ability to enhance TE related infrastructure." At WeaveGrid, we view the role of utilities as essential in supporting the EV market and accelerating transportation electrification. Utilities can provide products and services that help customers, including:

- Increasing customer awareness of EV options and familiarity with EV charging needs;
- Improving access to charging infrastructure and helping reduce the costs for customers; and
- Managing the integration of electric vehicles onto the grid, helping ensure that charging is affordable and incentivizing charging during off-peak times.

WeaveGrid appreciates the opportunity to provide written comments in support of the forthcoming Policy Statement. WeaveGrid is responding to questions 5 and 6 "For All Interested Parties," included in the March 17, 2025 *Notice of Opportunity to File Written Comments*.

#### Question 5.

WeaveGrid recommends against establishing a set maximum amount of time that utilities can hold on to their Clean Fuel Standards (CFS) credits before they must monetize them. While we agree that CFS funding is intended to be actively used to advance transportation electrification efforts in Washington state, creating a rigid timeframe can result in unintended negative impacts. For example, the CFS market does experience periods of volatility and if utilities are required to monetize credits at a period of time when credit prices happen to be low, there will be less funding available for transportation electrification efforts. Instead, providing flexibility to the utilities to monitor market conditions and monetize credits when the market is favorable can offer the greatest benefit to utility customers.

#### Question 6.

WeaveGrid does not believe that the Washington utilities should have a set schedule for filing their transportation electrification plans (TEPs). Utilities should

be able to file for new and continued program proposals as needed based on their existing activities and market dynamics.

Additionally, utilities undergo several planning processes, including load forecasting and integrated system planning. Transportation electrification planning is related to these other planning processes and ideally utilities have an opportunity to cross-reference planning processes so that they are aligned and coordinated. Given the complexity of several interrelated planning processes, we recommend that the utilities maintain flexibility for filing their TEPs allowing them to coordinate their various cross-functional approaches.

#### **IV. Conclusion**

WeaveGrid appreciates the opportunity to submit these comments. We thank the Commission for consideration of these comments and look forward to continued engagement.

Respectfully submitted,

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