



September 18, 2020

Docket No. UE-200607
-Via Electronic Mail-

Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

09/21/20 13:21

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RE: Comments of Greenlots in Support of Avista's Transportation Electrification Plan

Dear Commissioners and Staff,

Greenlots submits these comments to the Washington Utilities and Transportation Commission ("the Commission") in response to its August 6, 2020 "Notice of Opportunity to Comment" in the above referenced docket and inviting written comments on Avista's ("Avista" or "the Company") Transportation Electrification Plan ("TE Plan"), filed into the same docket on July 1, 2020. Per the Commission's August 20, 2020 "Notice of Change to Scheduled Due Date for Opportunity to Comment", this is timely filed.

Greenlots is a leading provider of electric vehicle ("EV") charging software and services committed to accelerating transportation electrification in Washington, and a wholly owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing amount of Level 2 infrastructure. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.

Greenlots has reviewed Avista's inaugural TE Plan and commends the Company on developing what is one of the most comprehensive and thorough documents of its kind that we have seen put forth by any utility. This thorough and well researched document will serve as an important foundation for its future activity in supporting transportation electrification ("TE"). In outlining Avista's role, history, plans for future programs for empowering and accelerating its customers' transition to electric transportation, and describing Washington's policy environment that has guided the Company's activity in this space, Avista has detailed a compelling vision for continuing to create value through transportation electrification for all Avista customers, and facilitating decarbonization of the transportation sector.

As the Company describes, electric transportation is a climate and environmental imperative, and with Washington's goals in these regards, similarly aggressive utility involvement in accelerating this transformation is both warranted and required, and is a strong benefit to all of its customers. Current market conditions and barriers to transportation electrification, which Avista describes and Greenlots can attest to, necessitate bold action on the part of the state's utilities, which stand in a unique and powerful position to support and accelerate this

transformation. Avista's leadership role in this space has also resulted in a strong positive impact and business opportunities for the private charging market, supporting competition and market development. A strong, central and active utility role is critical to attain these goals, maximize the significant benefits associated with transportation electrification, and support the growth and development of the broader market and industry.

Greenlots notes that in addition to the supportive policy landscape for activity in this space, Avista also has the support and direction of this Commission. As articulated in its 2017 "Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services", "[t]he commission recognizes that utilities will help align transportation electrification goals with electric system grid needs. The commission stands ready to work with statewide and regional planning organizations to facilitate efficient electrification of the transportation system to meet state policy goals."¹ Greenlots believes that Avista's TE Plan is consistent with the vision articulated in this policy statement, in particular the portfolio approach that is directed and encouraged.

As described in the TE Plan, Avista was an early and bold mover amongst the Nation's utilities in embracing its critical role in supporting and accelerating transportation electrification, and the Company deserves particular commendation for embracing this pioneering role. With this TE Plan, Avista positions itself to continue its leadership with a strategy to continue strong forward momentum through the scaling of successful programs, and the introduction of new programs. The magnitude of the challenge as expressed in state policy means that the state cannot afford any lull, recalibration, or anything other than strong and aggressive action moving forward which builds on its commendable accomplishments to date. Avista can and should be a national leader in this space, and Greenlots believes Avista has and should continue to receive the needed support of the state and Commission to assume this appropriate and deserved role.

Building on the learnings from its initial pilot programs, Avista's TE Plan presents a compelling 5-year plan with a 10-year vision outlining its role, planned investments and vision for accelerating and supporting transportation electrification. This includes both the scaling and continuation of past successful programs, such as components of the DC fast charging program and various load management strategies, while developing support in new areas and market segments, such as public fleets.

Avista's guiding principles and strategic objectives and goals provide a guiding north star which Greenlots finds to be broadly appropriate, however there remains opportunity to increase and accelerate its various goals in subsequent TE Plans. Additionally, Greenlots sees opportunity to expand into medium, heavy-duty and fleet programs, which represent areas that can achieve an even greater magnitude of environmental and climate benefits, in addition to often more directly addressing equity and environmental justice considerations. There is a wave of such vehicles coming to market, and this will put heightened pressure on the infrastructure programs

¹ At p. 1. Docket UE-160799

needed to support their proliferation and adoption. As the TE Plan notes, fleet and transit agencies and their electrification efforts in particular comprise an important component of this critical market segment. Considering this, Greenlots encourages exploration of a greater near-term focus in this area. For comparison, in California, of the well over \$1 billion in utility transportation electrification program expenditures that have been approved, a nearly half has been for medium and heavy-duty-focused programs.

Greenlots is broadly encouraged by and impressed with the scope and scale of Avista's TE Plan, representing one of the most thorough utility transportation electrification planning efforts we've seen. We provide these comments and suggestions with the goal of strengthening these program development efforts and supporting Avista's current and future initiatives in these areas. The state's leadership and aggressive goals provide strong demand and justification for expanded utility involvement, which Greenlots encourages and will support moving forward.

Greenlots appreciates the opportunity to provide these comments and the Commission's and the Company's consideration of them. Greenlots looks forward to continuing to support Avista's and Washington's transportation electrification and related efforts.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley
VP, Policy & Market Development