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Dec 19, 2024

December 12, 2024

Via Electronic Filing

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

Re: **Puget Sound Energy's General Rate Case, Docket No. UE-240004**

Dear Secretary Killip,

On September 18, 2024, Puget Sound Energy (PSE) filed rebuttal testimony updating its request for an increase to its base rates, which it originally filed on February 15, 2024 in this proceeding. PSE's revised proposal requests an increase in base rates of \$392.7 million in 2025, and an additional \$170.0 million in 2026.¹ Electrify America, LLC, a customer of PSE, submits this comment regarding PSE's rate proposal. Electrify America urges the Commission to take caution against raising rates for PSE customers, and in particular public DCFC stations for the reasons explained below.

A vast network of publicly accessible fast chargers is essential to meeting the state's sustainability and electrification goals. DCFC stations enable the electric vehicle driver to take longer trips in their EV and allow for those without access to off-street parking and at-home charging to more easily make the switch to an EV. The latter point is also key to assuring that Washingtonians from all walks of life can enjoy and access the benefits of electrifying transportation.

With that said, higher rates can represent a disincentive to realizing the charging network necessary to support the state's electrification goals. Higher costs erode the economic viability of existing stations and endanger future sites currently under consideration. Locations that may have worked under previous rates may not if rates were to increase. Additionally, utility-owned and operated DCFC stations can create an unlevel playing field in the market. Electrify America kindly requests that the Commission be cautious when contemplating a rate increase for DCFC stations and understand the potential ramification it could have on a robust future network of fast chargers.

Electrify America's Footprint

Electrify America, the largest open network of direct current fast charging (DCFC) stations in the U.S., is investing more than \$2 billion over 10 years in Zero Emission Vehicle infrastructure, education and access. This investment will enable millions of Americans to discover the benefits of electric driving and support the build-out of a nationwide network of ultra-fast community and highway chargers that are convenient and reliable. To date, Electrify America has built a coast-to-coast network of DCFC stations across over 950 locations and more than 4,250 individual DC fast chargers in total.

Electrify America is heavily invested in Washington. It currently operates 53 DCFC stations with 215 DC fast chargers in Washington, and it has several more DCFC stations currently in various levels of development within the state. Its stations remain open to the public 24 hours a day for seven days a week, and are needed to unlock long distance travel across Washington and serve local communities that have not connected to Electrify America's network to date.

¹ Exh. CTM-13T, p. 3, Lines 13-15; see also id., pp. 37-38.



Respectfully submitted,

/s/

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