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December 10, 2018

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S Evergreen Park Dr. SE
Olympia, WA 98504-7250

RE: Comments regarding Docket UE – 180877

Dear Mr. Johnson:

We thank the Utilities and Transportation Commission for the opportunity to comment on Puget Sound Energy's (PSE) light-duty electric vehicle programs (Docket UE-180877). Elected representatives from King County and partners, the Port of Seattle and the cities of Burien, Issaquah, Mercer Island, Shoreline, and Snoqualmie, are commenting jointly on PSE's filing that proposes a portfolio of products and services to promote market transformation in light-duty vehicle electrification. We appreciate the time and effort PSE has put into developing a broad portfolio of programs that serve diverse populations and should increase awareness of and access to electric vehicle charging. We are excited about the pilot charging programs in a range of settings, including workplace, public, multi-family housing, and single family residential locations.

In general, we support vehicle electrification as one part of a comprehensive strategy for reducing greenhouse gas emissions from the transportation sector, and we support PSE's proposals in Docket UE-180877. To maximize emissions reduction benefits, we support incentives for off-peak vehicle charging, and encourage future action by the UTC to develop a framework that would allow PSE to serve any additional load for vehicle charging with

renewable electricity. Increasing transit service continues to be a priority climate action for our jurisdictions, and we would also like to continue to work with PSE and the UTC to develop programs that complement increased transit service and transit electrification.

Through the Growth Management Planning Council, 39 cities, the Port of Seattle, and King County have established shared, formal targets to reduce greenhouse gas emissions by at least 50 percent by 2030 and 80 percent by 2050. As members of the King County-Cities Climate Collaboration (K4C), we have committed to specific targets, including reducing the greenhouse gas emissions intensity of fuels for passenger vehicles and light trucks by 15 percent, and reducing overall vehicle miles traveled by 20 percent below 2012 levels by 2030. Currently, local governments representing more than 1.5 million residents have endorsed the K4C's Joint County-City Climate Commitments.

Our comments are framed by principles for collaboration in the shared Climate Commitments. These principles affirm that progress on shared climate goals will require partnerships between local governments, utilities, businesses, and community organizations.

In the most recent greenhouse gas emission inventory King County conducted in 2015, transportation-related emissions comprised nearly one-third of total county emissions. To reduce transportation-related emissions, King County and its city partners have developed policies and made investments in programs that promote transit, and focus development of housing and employment in communities that are accessible by bus, rail, bike, and pedestrian options so as to limit single passenger vehicle trips. We want to ensure that PSE's programs are complementary to our investments in transit and alternative modes of travel, and look forward to continued conversations and partnership on developing innovative mobility solutions, such as "last-mile" programs near Metro Park and Ride facilities or transit centers.

King County and its partners are approaching carbon reduction policies comprehensively. We want to ensure that increased vehicle electrification does not result in the unintended consequence of development of additional fossil-fuel fired baseload or peaking generation capacity. Therefore we support PSE's residential and public charging programs that have peak load reduction incentives and look forward to the analysis of the impact of the different incentive structures. Additionally, we would like to see the UTC consider future policies that would support the increased load from electric vehicle charging being served by renewable electricity. Supplying the additional load with renewable resources would maximize the benefits of vehicle electrification in reducing transportation related emissions.

King County and partners the Port of Seattle, and the cities of Burien, Issaquah, Mercer Island, Shoreline, and Snoqualmie have a long term interest in the health and wellbeing of our residents. We thank the UTC for its leadership on advancing public policy goals of reducing greenhouse gas emissions through electrification of the transportation sector, and encourage the UTC to explore additional future opportunities to allow PSE to further maximize the benefits of vehicle electrification.

We thank PSE for its leadership in developing these first initial programs, and are ready to collaborate with PSE as these programs launch and mature to serve a dynamic market.

Sincerely,



Dow Constantine
King County Executive



Fred Felleman
Commissioner, Port of Seattle



Nancy Tosta
Councilmember, City of Burien



Mary Lou Pauly
Mayor, City of Issaquah



Debbie Bertlin
Mayor, City of Mercer Island



Salim Nice
Deputy Mayor, City of Mercer Island



Bruce Bassett
Councilmember, City of Mercer Island



Benson Wong
Councilmember, City of Mercer Island



Will Hall
Mayor, City of Shoreline



Matt Larson
Mayor, City of Snoqualmie