



**NW Energy Coalition**  
for a clean and affordable energy future

October 7, 2022

Ms. Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

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COMMISSION

*Re: NW Energy Coalition's comments in Docket UE-220359, PacifiCorp's Transportation Electrification Plan Pursuant to RCW 80.28.365*

Dear Ms. Maxwell:

The NW Energy Coalition ("NVEC" or "Coalition") appreciates the opportunity to provide comments on PacifiCorp's Transportation Electrification (TE) Plan. The TE Plan, filed May 20, 2022, provides an assessment of the market conditions in PacifiCorp's service area, evaluates potential impacts to the distribution grid, and proposes a modest portfolio budget. Additional information, filed September 28, 2022, includes necessary updates and clarifications to the TE Plan. Considering this additional information, the Coalition's comments focus on: (1) PacifiCorp's updated EV forecast; (2) accessible and affordable electric vehicle charging; (3) reporting; and (4) the proposed budget.

### **EV Forecast**

PacifiCorp updated their electric vehicle (EV) forecast, which reflects input received from stakeholders at the UTC EVSE Stakeholder Meeting, to account for policy changes from the Inflation Reduction Act and Advanced Clean Cars II. The policy landscape for transportation electrification is rapidly evolving and will require PacifiCorp to frequently update the EV forecast. As a result, NVEC requests PacifiCorp:

- provide an updated forecast within each TE Plan report;
- incorporate Advanced Clean Trucks and Advanced Clean Cars II into the baseline assumptions;<sup>1,2</sup>
- forecast medium- and heavy-duty truck adoption in the service territory; and

<sup>1</sup> The Department of Ecology adopted the Advanced Clean Trucks rule in 2021, effective in model year 2025. <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-423-400>

<sup>2</sup> The Department of Ecology is currently undertaking a rulemaking to adopt Advanced Clean Cars II, which would take effect in model year 2026. <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC173-423-400Jan18>

- integrate the EV forecast into subsequent integrated resource plans, consistent with RCW 19.280.030.

### **Accessible and Affordable EV Charging**

NWEC appreciates PacifiCorp's commitment to interoperability. The absence of EVSE interoperability can substantially lessen competition, leave EVSE site hosts at risk of stranded assets, and ultimately result in an unreliable and inaccessible EVSE ecosystem for customers. For these reasons, we support the use of Open Charge Point Protocol standards.

In addition to interoperability standards, PacifiCorp should, at a minimum, comply with the final EVSE Standards adopted by the Washington State Department of Agriculture by the end of 2022.<sup>3</sup> However, in order to facilitate more equitable access, we encourage PacifiCorp to explore additional payment methods, multilingual options, and ADA design standards.<sup>4</sup>

Lastly, we want to recognize the significant cost disparity between customers who have access to EV charging at home on a residential rate and customers who do not have access to EV charging at home. As EVs become more prevalent, this cost disparity will disproportionately burden renters, low-income customers, and folks living in multifamily housing. We urge PacifiCorp to reduce cost disparities and increase access to charging through programs and rates designed to benefit these customers. As an initial action, PacifiCorp should continue working with the Equity Advisory Group to co-develop a pilot program that supports EV charging infrastructure at multifamily housing within the timeframe of this TE Plan.

### **Reporting**

PacifiCorp's proposed reporting schedule, included in the addendum filed September 28, 2022, appears to be consistent with Avista's and Puget Sound Energy's TE Plan reporting requirements, but it lacks specific commitments and metrics to track TE portfolio progress. We request PacifiCorp specifically include, in each subsequent report, updated EV registration data and forecasts, load shapes for various use cases, load and distribution grid impacts, expenses to date, and progress towards implementing the TE programs outlined in the TE Plan. In addition to these updates, we recommend PacifiCorp report on a set of metrics consistent with either

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<sup>3</sup> Washington State Department of Agriculture's WAC 16-662 Electric Vehicle Supply Equipment Rulemaking, available at <https://agr.wa.gov/services/rulemaking/wac-16-662-electric-vehicle-supply-equipment>

<sup>4</sup> U.S. Access Board's Design Recommendations for Accessible Electric Vehicle Charging Stations, available at <https://www.access-board.gov/tad/ev/>

the TE related metrics included in PSE's proposed GRC settlement stipulation, metrics outlined in the Oregon Public Utilities Commission Order No. 22-314, or a combination of the two.<sup>5,6</sup>

### **Proposed Budget**

The proposed portfolio budget, filed September 28, 2022, does not appear to compare the proposed expenditures against the 0.25% annual revenue requirement limit defined by RCW 80.28.360. This comparison is a useful data point in assessing the scope and scale of the proposed TE Plan budget. We request PacifiCorp provide this information in advance of the October 27<sup>th</sup> open meeting.

### **Conclusion**

NWEC appreciates PacifiCorp's work to accelerate transportation electrification. We support PacifiCorp's proposed program portfolio and encourage PacifiCorp to leverage lessons learned from their Oregon TE programs. NWEC plans to be in attendance at the October 27, 2022 open meeting and can respond to any questions on these comments at that time.

Respectfully submitted,

Annabel Drayton  
Policy Associate  
NW Energy Coalition

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<sup>5</sup> See UTC docket UE-220066/UG-220067 and UG-210918 (Consolidated), Settlement Stipulation and Agreement on Revenue Requirement and All Other Issues Except Tacoma LNG and PSE's Green Direct Program (August 26, 2022)

<sup>6</sup> See PUC Docket UM 2165, Order No. 22-314 (August 26, 2022), available at <https://apps.puc.state.or.us/orders/2022ords/22-314.pdf>