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Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission (UTC)  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: Docket UE-230287; PSE Tariff Filing for EV Charging**

Dear Ms. Maxwell:

SWTCH welcomes the opportunity to offer this letter of support for Puget Sound Energy's (PSE) EV charging tariff filings to advance transportation electrification in Washington. We believe the proposed tariffs are reasonable and the associated programs are well designed to facilitate and accelerate meaningful reductions in Washington's transportation sector carbon emissions. They will also support environmental justice goals by enabling greater access to electric mobility and cleaner air for historically disadvantaged communities.

SWTCH provides electric vehicle (EV) charging and energy management solutions designed specifically for high-density urban settings. Our innovative, open standards-based platform optimizes EV charging usage to benefit both EV charging station operators and drivers. SWTCH sees substantial value in deploying charging solutions focused on the multifamily property and workplace sectors in Washington, and therefore has a direct interest in the approval of PSE's tariff filings to support further EV charging deployment.

**Tariff and Program Design:** Washington's ambitious EV adoption goals will require substantially more deployment of EV charging infrastructure across a wide range of market segments including residential, multifamily buildings, workplaces, and publicly accessible areas. Industry experience has shown there is no "one size fits all" type of deployment strategy or business model that is best suited to all deployment situations or to individual customer needs. Given this industry experience, the need for substantially more deployment in Washington, and the fact that the EV charging market is still evolving and maturing, SWTCH believes a variety of utility-led business models are appropriate for the Commission's consideration. These include both the deployment of charging infrastructure with PSE as the owner and operator, and a make ready approach where PSE supports and facilitates installation of customer-owned and operated chargers. This multifaceted approach is especially warranted in the multi-tenant property sector, given the diversity of landlord and tenant motivations, constraints, and other considerations.

SWTCH further supports PSE's requirement for charger conformity with the Open Charge Point Protocol (OCPP) in the proposed tariff. This requirement will help safeguard against vendor lock-in and avoid ratepayer-funded stranded assets. It will also ensure PSE's charging network meets the highest industry standards for compatibility, security, and interoperability, thereby facilitating a more seamless EV charging and driver experience in Washington State.

**Public:** The EV charging solutions provided by PSE's proposed expanded public charging program will help meet the charging needs of EV drivers living, working, and patronizing businesses in PSE's service territory. The program supports curbside charging installations, creates multi-purpose charging stations (e.g. fleet, public and workplace), and supports a variety of locations for charger installations (in business districts, residential neighborhoods, parks and community centers). SWTCH believes that PSE's support for public charging will reduce range anxiety and make EV adoption more accessible across different socio-economic demographics.

**Workplace:** To attract and retain tenants, EV charging at work is no longer an amenity, but a necessity. PSE's workplace installation and maintenance incentives will facilitate equitable access to EV charging for employees. This will have the added benefit of enabling EV adoption for employees who lack access to dedicated home charging options. Additionally, SWTCH believes that enabling support for workplace charging offers valuable opportunities for load balancing, given the longer average dwell times at workplaces.

**Alternative Technology Demonstration:** The EV charging industry is constantly innovating and developing new products and solutions, including those intended to meet the unique needs of multi-tenant properties, workplaces, and public use cases. SWTCH is therefore pleased to see that PSE's filing includes demonstration projects to identify and test new technologies or services that offer the potential to deliver greater benefits and return value to ratepayers. SWTCH sees significant potential in the initial focus area of vehicle-to-grid (V2G) integration. These types of demonstration projects can provide valuable learnings for utilities and other stakeholders, and are a prudent investment of ratepayer dollars in order to inform and shape subsequent at-scale programs.

**Additional Benefits:** PSE's proposed programs build on and complement State and Federal funding and tax incentives to ensure communities in Washington benefit from every opportunity to reduce upfront costs. More specifically, these proposed programs are poised to fill the gaps that limited income residents face disproportionately in terms of technical and financial resources. One of SWTCH's core tenets is that disadvantaged communities and multifamily building residents should have equitable access to transportation electrification and its benefits. PSE's proposed programs appropriately provide more robust financial incentives for historically underserved communities, and also address barriers to equitable access through enhanced educational and technical assistance.

## **Conclusion**

SWTCH supports PSE's efforts to address the urgency of equitably deploying charging infrastructure and advancing EV adoption across multiple customer segments. Approving PSE's Single Family,

Workplace, Public and Alternative Technology Demonstrations tariffs are an important next step toward realizing an electrified transportation future.

SWTCH appreciates the opportunity to offer support for PSE's proposed filings and looks forward to working with PSE and other stakeholders to accelerate the adoption of transportation electrification in Washington.

If you have questions or if I can provide more information, please contact me at [josh.cohen@swtchenergy.com](mailto:josh.cohen@swtchenergy.com).

Respectfully,

A handwritten signature in blue ink, appearing to read 'Josh Cohen', with a long horizontal flourish extending to the right.

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