

Seattle Electric
Vehicle Association



Member Chapter of the EAA

Comments on docket UE-180877: PSE EV pilot projects

December 12, 2018

The Seattle Electric Vehicle Association (SEVA) appreciates the opportunity to provide comments on Puget Sound Energy's EV charging pilot projects. SEVA brings together electric vehicle enthusiasts from the newest Tesla owner to members who have been converting gasoline cars to normal cars since the 1980's. Our members are experts in EV hardware, charging infrastructure, and have assisted with policy issues in the Legislature. You can learn more about us at <http://www.seattleeva.org/wp/>

SEVA supportive of PSE's pilot projects and has provided volunteers for their EV education events. Their intent is well thought out, and PSE clearly invested a lot of time into designing programs to test customer behavior. But there is one significant flaw in the proposal; the \$7.50 flat fee for DC Fast Charging sessions.

The comparative pricing quoted by PSE in their rate filing is outdated. EVGo tried a flat fee for DC fast charging, but they abandoned this scheme around April 2018. Seattle City Light initially announced a flat fee for DCFC, but also abandoned that approach after accepting SEVA input and now charges \$0.43/kWh with a limit of 60 minutes per session.

SEVA has passed a resolution on this matter, as follows:

SEATTLE Electric Vehicle Association finds that fixed price DC Fast Charging sessions are both inequitable and counterproductive to the goal of providing a reliable fast charging infrastructure, inasmuch as fixed price sessions make no allowance for the wide disparities in both battery size and the state of charge that customers arrive with. Fixed price fast charging sessions also incentivize users to remain connected for the maximum time to achieve a full charge, which creates wait times for other users, decreases the number of customers served, and reduces the total miles of charging delivered per station. Therefore, SEVA calls upon electric utilities to implement time-based fee structures. In DC Fast Charging, the billing scheme must encourage Fast Charging, as time spent charging is the most valuable component of a Fast Charging session.

Thank You,

Jay Donnaway, CEM

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