

Attachment A to Advice No. 2022-13
Puget Sound Energy's Electric Tariff
Revision Schedules 552, 555, 556, and 583

| <u>Schedule</u> | <u>Summary of Comments(s)</u> | <u>Comment Incorporated into Tariff's?</u> | <u>PSE Response</u> |
|---|--|--|---|
| EV Energy, received on February 25, 2022 | | | |
| All | Strongly encourages PSE to implement vehicle telematics (in addition to L2 chargers) as a means of metering in upcoming programs | No | PSE will explore methods of sub-metering the EV load through telematics and other technologies which will allow PSE to develop a robust understanding of the load shapes of the many charging use cases and will enable PSE to better forecast load impacts that result from those use cases. |
| Climate Solutions, received on April 8, 2022 | | | |
| 555 | We recommend adjusting the language in the tariff so incentives are not limited to electric shuttle vehicles and school buses. Not specifying an exact vehicle type, but rather providing incentive amounts based on vehicle weight or class would add flexibility, and the Company could still maintain discretion on incentive awards. | Yes | PSE updated tariff schedule 555 based on feedback to reflect broadened EV categorizations by vehicle weight class to include light duty, medium duty, and heavy duty weight classes instead of by types of vehicles in order to maintain original incentive design. |
| 556 | We encourage PSE to consider direct load management strategies as a potential tool. | No | PSE recognizes the value of Demand Response and Time Varying Rates as additional tools for EV load management and has included in tariff schedule 556 a provision by which Customers receiving service under this schedule will be enrolled in demand response or time-of-use rate services when such services become available. PSE is exploring such services as part of its Distributed Energy Resources RFP under docket UE-210878 and has proposed a Time Varying Rates pilot as part of the Company's General Rate Case under docket UE-220066. |
| 583 | We support the somewhat broadened definition of "Equity Focused Customer": a Customer that is part of Named Communities or a Customer that shares demographic characteristics with Customers in Named Communities; and the Community Based Organizations (CBOs), government agencies and tribal entities that serve them. | Yes | This broadened definition to include the proposed underlined language was incorporated in tariff schedule 583. |
| Public Counsel, received on April 5th, 2022 | | | |
| 555 | I did have one question though regarding item 4A (company owned chargers at host's site). It's not clear to me if the line extension costs are to be covered by the host, or only to be covered by the host if in excess of the other installation costs. Could you clarify? If the line extension is to be paid for by the host, what is the usual cost of something like that? And are there alternative funding sources for hosts to help defray some of those costs? | No | Regarding company owned chargers, the company will cover the costs of interconnection up to the total site allowance of \$250,000 which would be inclusive of the typical costs for a new switch gear, meter, transformer and line to existing infrastructure for interconnect. Therefore, if the interconnect of the new EV load (larger systems) require distribution system upgrades exceeding the maximum site allowance, the site hosts would be responsible for the costs as outlined in Schedule 85. |
| NWEC, received on April 11, 2022 | | | |
| All | Recommended PSE file new and update existing tariffs that comprehensively integrate direct load control | No | PSE recognizes the value of Demand Response and Time Varying Rates as additional tools for EV load management and has included in tariff schedule 556 a provision by which Customers receiving service under this schedule will be enrolled in demand response or time-of-use rate services when such services become available. PSE is exploring such services as part of its Distributed Energy Resources RFP under docket UE-210878 and has proposed a Time Varying Rates pilot as part of the Company's General Rate Case under docket UE-220066. |

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| WeaveGrid, received on April 11, 2022 | | | |
| 552/555 | For the fleets and multi-family programs (Schedules 552 and 555), we believe it is important for the language to be flexible so that PSE can choose to support more use cases if there is demand. For instance, the current multi-family draft tariff is well suited for buildings with shared parking arrangements, and the program could eventually support other parking arrangements (e.g., assigned parking). Similarly, the fleets tariff could allow for supporting more fleet use cases, such as plug-in hybrids, non-road vehicles, and on-route charging for fleet vehicles, when PSE determines the timing may be right. | No | PSE does not put a restriction on assigned or shared parking spaces and current tariff language allows for flexibility in expanding use-cases in the future, . The only requirement that is currently written regarding parking stalls is as follows: Section 4D in 552 states that "A Host must provide dedicated parking stall(s) for electric vehicle charging during the entire term of the Service Agreement". As it relates to fleet use cases in 555, the current definition of EV in Schedule 583 allows for non-road vehicles and plug-in hybrids. And though on-route/opportunity charging for fleet vehicles is not explicitly mentioned, PSE believes there is nothing that precludes said projects in the currently proposed tariff language. |
| 556 | For the EV load management incentive (Schedule 556), the tariff could include support for Level 1 charging in addition to Level 2. While we acknowledge the importance of focusing on managed charging for Level 2, Level 1 can still be a significant source of load (> 1 kW, which is higher than most other residential loads), and customers charging at Level 1 often have the flexibility to shift their charging to off-peak windows. By including Level 1 charging in the program, PSE could enroll more participants and support more load shifting. | No | PSE's proposed EV load management program in Schedule 556 is not adequate for supporting L1 load management at this time. The program asks for customers to avoid charging for 10 hours per day, which would be too difficult for customers to accomplish at low charging speeds. Further, the value of the incentive - if developed using the same mechanisms as the incentive for L2 and DC Fast - would be too low to attract customers. PSE is interested in supporting L1 load management with future load management techniques such as time varying rates and demand response. |
| 556 | For Schedule 556, the program design could encourage nearly all customers to schedule charging at 10:00p, potentially resulting in a "timer peak." PSE could consider options for mitigating timer peaks, including automating the charging to stagger or providing multiple off-peak windows for customers to choose from. For instance, Xcel Energy in Colorado, with its Optimize Your Charge program, encourages customers to sign up for one of three off-peak windows (9p-6a, 12:30a-9:30a, 6:00a-3p) to distribute the charging throughout their off-peak period. While PSE's program has two on-peak periods, PSE could consider creating windows for customers to schedule night-time charging, such as 10:00p-4:00a and 12:00a-6:00a. | No | PSE appreciates the suggestion and believes it to be a smart mechanism for avoiding the Timer Peak. However, PSE intends to support similar off-peak windows through the education and communication components of the load management programs, which are not detailed in the tariff. Customers will be encouraged to charge in different windows from each other, but their financial incentive will only be affected by performance as outlined in the tariff. |
| Commission Staff, received on April 11, 2022 | | | |
| 552 | Question around the purchase of EVs for equity-focused customers in Schedule 552. I think I had the impression from the TEP that the purchase of EVs for equity-focused customers would be reserved for community-based organizations, but if I'm reading Schedule 552 correctly, it seems like the plan is to offer incentives for EVs to individual residential customers. Is that accurate? | No | Section 6.A on sheet no. 552-C states that "Equity-Focused Customer must be a Host taking service under this Schedule to qualify as eligible for this incentive". The intent of that language is to allow for EV incentives for Equity-Focused customers under Schedule 552; such as shared light duty EVs or shared e-bikes or e-scooters at multifamily residences, to be owned and operated by CBOs, government agencies or tribal entities. Section 6.B does allow the flexibility for individual multifamily resident to access incentives for e-bikes or e-scooters. |

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| <i>Commission Staff, received on April 11, 2022</i> | | | |
| 583 | I am also thinking through what it means to be "part of" a named community as "Equity-Focused Customer" defines it in Sch. 583. Does that mean "located in"? "Owned/managed/run by"? All of the above? Something different? I'm not sure I've fully thought through some of these questions until now. | Yes | Our intent is to both address Named Communities that are defined by the geographic bounds outlined in the CEIP and those customers who share characteristics of Named Communities (e.g. low-income households), but may fall outside those geographic parameters. At this time, we would consider a BIPOC owned small business as an eligible program applicant. As a result of this discussion, we have updated definition for Equity-Focused Customer in Schedule 583 to read "Equity-Focused Customer is a Customer that is part of Named Communities <u>or a Customer that shares demographic characteristics with Customers in Named Communities</u> ; and the Community Based Organizations (CBOs), government agencies and tribal entities that serve them". This change has been socialized with NWECC and Climate Solutions and both were supportive and/or had no concerns about the change. |
| 583 | How will the company determine what is and isn't a CBO? How will it be determined whether a CBO, agency, or tribal entity specifically serves a named community? | Yes | A CBO must serve Equity-Focused Customers, as defined in Schedule 583. As such, PSE has edited the definition of CBO in Schedule 583 to read: "Community-Based Organizations or CBO are essential and trusted service providers for the communities they serve. Examples include but are not limited to: social service organizations, food banks, affordable housing providers or non-emergency medical transportation providers that serve Equity-Focused Customers." PSE will also have an application process in which program applicants are required to explain in detail how and why they qualify. PSE will then verify those details to ensure Equity-Focused Customer funding is being appropriated to the correct customers. |
| 583 | Does a connection need to be made here from the legal definition of a Vulnerable Population to the Vulnerable Populations identified in the CEIP? | Yes | In order to reflect Vulnerable Populations identified in the CEIP, the definition was changed to: Vulnerable Populations or VP means communities that experience a disproportionate cumulative risk from environmental burdens due to: Adverse socioeconomic factors, including unemployment, high housing and transportation costs relative to income, access to food and health care, and linguistic isolation; and sensitivity factors, such as low birth weight and higher rates of hospitalization. These communities are stated in PSE's approved Clean Energy Implementation Plan. |
| <i>ChargePoint, received on April 11, 2022</i> | | | |
| 552/555 | The incentive levels included in draft Schedules 552 and 555 would provide greater incentives for company-owned EVSE than for host-owned EVSE. The effect of these proposed incentives is that a site host who chooses to own the charging stations itself would be required to pay for additional costs, in comparison to customers choosing the company-owned option, due to the lower incentive amounts. | No | PSE developed the EVSE incentive models based on customer feedback and believes they provide the desired flexibility should a host wish to own and operate its own EVSE. The Company-owned cost structure is higher given the capital and operating investments PSE must make to install, own and maintain the EVSE for the term outlined in the Schedule as opposed to the host-owned EVSE where PSE will have no tangible rights to or requirement to maintain said EVSE. Additionally, PSE understands that hosts may choose to access State and Federal grant funding to further defray expenses, and may also be eligible for credit generation as the EVSE owner under WA State's Clean Fuels Program. For these reasons PSE feels the proposed design offers options while ensuring a level of parity. |