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July 29, 2021

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Puget Sound Energy 2021 Transportation Electrification Plan,
Docket UE-210191

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in response to the May 26, 2021, Notice of Opportunity to File Written Comments in Docket UE-210191. These comments address Puget Sound Energy's (PSE) 2021 Transportation Electrification Plan.

Public Counsel's Recommendation

Public Counsel recommends the Commission acknowledge PSE's Transportation Electrification Plan and encourages the Company to include a cost-benefit analysis for the proposed programs as recommended by the Commission's Docket UE-160799 Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services.

PSE submitted their Transportation Electrification Plan for acknowledgement by the Commission, pursuant to RCW 80.28.365. The statute states that a plan may include:

- (a) Any programs that the utility is proposing contemporaneously with the plan filing or anticipates later in the plan period;
- (b) Anticipated benefits of transportation electrification, based on a forecast of electric transportation in the utilities' service territory; and
- (c) Anticipated costs of programs, subject to the restrictions in RCW 80.28.360.¹

¹ RCW 80.28.365(1).

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In PSE's initial filing, they outline a broad vision for their role in the development of the sector as a whole, including supporting market transformation, charging infrastructure, planning for and managing electric loads, and addressing issues of equity and inclusion. Public Counsel appreciates the Company's significant efforts to set out their vision and approach to transportation electrification, which will be a very important piece of Washington's efforts to combat climate change. We were concerned about the lack of some specific details for the Company's proposed programs and appreciate the Company's subsequent filing, the Addendum to the 2021 Transportation Electrification Plan, filed July 14, 2021, which we also reviewed.

As noted above, RCW 80.28.365 sets out several components that a Transportation Electrification Plan may include, and the Company has addressed those components. The statute also provides that in reviewing a transportation electrification plan, the Commission may consider the following:

- (a) The applicability of multiple options for electrification of transportation across all customer classes;
- (b) the impact of electrification on the utility's load, and whether demand response or other load management opportunities, including direct load control and dynamic pricing, are operationally appropriate;
- (c) system reliability and distribution system efficiencies;
- (d) interoperability concerns, including the interoperability of hardware and software systems in electrification of transportation proposals; and
- (e) the benefits and costs of the planned actions.²

Public Counsel encourages the Commission to particularly consider the availability of PSE's programs across all customer classes through an equity lens and what the impacts of PSE's transportation electrification programs will mean to the Company's load and demand response programs. Further, we encourage the Commission to urge the Company to include a cost-benefit analysis for the programs in its plan. In Docket UE-160799, the Commission recommended that utilities include information about the costs and benefits of their programs when designing them.³ While PSE's current plan does address costs, including a more traditional cost-benefit analysis would help to better inform stakeholders and the Commission about the programs the Company is planning to implement and the advantages or potential drawbacks for those programs.

² RCW 80.28.365(2).

³ *In re: Amending and Adopting Rules in WAC 480-100 Rulemaking to Consider Policy Issues Related to the Implementation of RCW 80.28.360, Electric Vehicle Supply Equipment*, Docket UE-160799, UTC Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services, ¶¶ 93–95 (June 14, 2017).

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Public Counsel appreciates the opportunity to submit these comments. If you have any questions about this filing, please contact Stephanie Chase at (206) 521-3212 or via e-mail at Stephanie.Chase@ATG.WA.GOV.

Sincerely,

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