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April 28, 2016

Steven King, Executive Director and Secretary
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

RE: Avista Corp's Tariff WN U-28

Dear Mr. King,

Thank you for the opportunity to participate in these Open Meetings on Avista's EV Charging proposal. We have appreciated the discussion on the impact of a "pilot" of this size on competition, customer choice, and EV adoption in Avista's territory. ChargePoint has been unable to engage Avista and finds it unfortunate that no major changes have been made to this proposal to address our concerns.

ChargePoint disagrees with the UTC Staff memo statement that the size of this pilot warrants moving forward without issues of customer choice being adequately addressed. Avista's service territory currently has very little existing infrastructure and a pilot of this size, including 265 charging stations across residential and nonresidential sites, is a significant program. Avista's service territory currently has just a handful of public charging ports according to the US Department of Energy Alternative Fuels Data Center, therefore this program in the next three years will grow the market significantly. While this is a laudable achievement, it also underscores the fact that this pilot will almost certainly represent the entire growth of the charging market in this territory during the next three years.

It will be difficult if not impossible to sell a charging station at full price outside of this program when something subsidized is available through the utility. Allowing Avista to select a single vendor and offer that equipment highly subsidized to site hosts will lock out all non-selected vendors from selling in this territory until every station intended to be installed under this pilot has been deployed.

This issue could be easily remedied by Avista selecting multiple vendors and allowing the site host to choose from this list of qualified stations. This does not change the role Avista is seeking in terms of station ownership. Puget Sound Energy has customer choice built into their residential charging pilot and operates a rolling vendor qualification process. Utilities in California including San Diego Gas and Electric, Southern California Edison, and Los Angeles Department of Water and Power all have model programs where the utility qualifies multiple vendors and multiple products in order to provide for customer choice. It is important to note that in all of these utility programs, multiple vendors of differently priced equipment are included in the program. The utilities incorporate those cost differences into the program and/or require the difference in cost to be covered by the site host.

Furthermore, allowing Avista to move forward with a pilot that does not meet the requirements of RCW 80.28.360 will create a more contested, lengthy process for approving any ratebasing of or expansion of this pilot. RCW 80.28.360(1) states that "[t]he Commission must consider and may adopt other policies to improve access to and promote fair competition in the provision of electric vehicle supply equipment." In the event that these issues are not resolved prior to approval of Avista's tariff filing, we ask that the Commission



to clearly state in its decision that these issues will be included in the review of Avista's application to seek rate recovery pursuant to RCW 80.28.360.

Finally, ChargePoint encourages the Commission to consider a policy workshop defining the terms of HB 1853 and RCW 80.28.360 in order to direct Avista's future efforts to expand this program and clarify the policy ahead of other utilities in Washington seeking similar investments.

Sincerely,

Anne Smart
Director, Government Relations and Regulatory Affairs
ChargePoint