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July 30, 2021

Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Climate Solutions Comments on Docket UE-210191

Dear Mark Johnson,

Thank you for the opportunity to submit comments on Docket UE-210191, Puget Sound Energy's Transportation Electrification Plan. Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a hub of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub.

The transportation sector is responsible for the largest share of Washington's greenhouse gas emissions and other toxic pollutants, making electrification of transportation a critical component of achieving Washington's statutory greenhouse gas limits and addressing climate change and air quality.¹ Utilities are uniquely positioned to catalyze electric vehicle deployment through strategic investments in electric vehicle supply equipment and other services that facilitate widespread transportation electrification. Given customers' high trust in utilities, providing programs, education, and resources will also help accelerate the transition to cleaner transportation powered by clean electricity.

Climate Solutions is very supportive of PSE's decision to create and implement this Transportation Electrification Plan (TEP). We encourage its approval given that the benefits of implementing this plan will be significant. Given their potential benefits and current barriers, commercial and fleet vehicles and residential multi-family uses are key segments to support and we are excited to see PSE intends to create related new offerings in the near term. We are particularly supportive of future filings around time of use (TOU) rates for both residential and commercial customers. It is very important that as electric vehicle uptake accelerates load is managed. PSE's findings from its Up & Go Residential Program show that financial incentives are effective in encouraging shifts to off-peak charging. We look forward to PSE continuing programs and learnings in this space and providing our feedback as they file new offerings with the Commission. We also have some suggestions on how to augment or implement programs in the TEP which we hope will be considered as the utility submits subsequent filings to the Commission. These recommendations are described in more detail below. They include:

- Update forecasts to align with state law, most notably the Zero Emission Vehicle Mandate and the Advanced Clean Truck Rule, and update the EV adoption, EVSE implementation, and EV load impacts accordingly

¹ Washington Department of Ecology, "2017 greenhouse gas data." <https://ecology.wa.gov/Air-Climate/Climate-change/Greenhouse-gases/2017-greenhouse-gas-data>.

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- Remain flexible and iterate programs based on lessons learned
- Apply an environmental justice lens to all programs and prioritize investments where communities are disproportionately burdened by road pollution
- Ensure public and multi-family charging is accessible and easy to use

We would also like to note that we are glad to see more detail in the addendum to the TEP that was submitted by PSE. We are especially pleased to see the community engagement plan for Diversity, Equity, and Inclusion TE products and more information about upcoming filings for commercial and fleet customers, reporting, and background on modeling load systems impacts.

Update forecasts to align with state law

We appreciate the addendum to the TEP that explains the modeling to determine load system impacts and the assumptions that shaped the forecasts. However, we continue to have concerns that we hope will be reflected in the refreshed analysis next year.

According to the addendum, the analysis was completed in Q1 of 2021, prior to the passage of HB 1091, the Clean Fuel Standard; SB 5126, the Climate Commitment Act; SB 5192, supporting access to EVSE; and other supportive policies. However, the passage of SB 5811, which bound Washington to California's zero emission vehicle standards, had already been adopted. Though Washington State is currently undergoing rulemaking to adopt these regulations, we know what the trajectory is going to look like based on California's actions, which statute binds us to. Prior to the modeling, California had already adopted its Advanced Clean Trucks regulation, which requires 40-75% of truck sales (depending on vehicle class) to be zero-emissions by 2035.² Additionally, Governor Newsom had released his executive order for the Zero Emissions Vehicle Mandate require 100% of new passenger vehicle sales to be zero emissions by 2035 which is now undergoing rulemaking (Advanced Clean Cars II).³ The result of these policies will be far more than EVs accounting for 29% of sales volume in 2030 that is listed in the current plan. In fact, the current proposal from the California Air Resources Board has a stringency of 60% of real passenger vehicle sales as zero emissions in 2030.⁴ Though this trajectory may slightly change in terms of yearly targets for passenger vehicle sales between now and 2035, the end goal is known and clearly means a larger volume of EVs than is planned for in the current market analysis in the TE Plan.

The policy landscape surrounding transportation electrification is rapidly accelerating and this, combined with vehicle price parity, means that PSE should be planning for a more rapid market transformation. It is essential that utilities take a lead role in planning for the transition to electrification in order to maximize customer benefits of electrification and minimize potential impacts to the grid. We believe the upcoming market analysis in

² Natural Resources Defense Council, "California Makes History with Clean Trucks Rule." <https://www.nrdc.org/experts/patricio-portillo/california-makes-history-clean-trucks-rule>.

³ Office of Governor Gavin Newsom, "Governor Newsom Announces California Will Phase Out Gasoline-Powered Cars & Drastically Reduce Demand for Fossil Fuel in California's Fight Against Climate Change." <https://www.gov.ca.gov/2020/09/23/governor-newsom-announces-california-will-phase-out-gasoline-powered-cars-drastically-reduce-demand-for-fossil-fuel-in-californias-fight-against-climate-change/>.

⁴ California Air Resources Board, "Advanced Clean Cars (ACC) II Workshop." https://ww2.arb.ca.gov/sites/default/files/2021-05/acc2_workshop_slides_may062021_ac.pdf.

2022 reflect must the above policy advances, particularly the Advanced Clean Cars II trajectory, the Advanced Clean Truck rule, and impacts from the Clean Fuel Standard and the Climate Commitment Act, and that program offerings are updated accordingly.

Remain flexible and iterate programs based on lessons learned

We are glad to see in the addendum that PSE will release periodic reports to stakeholders on TEP program progress and that the company also plans to release a more detailed report in 2024 including lessons learned. It is important that the company remain flexible in program implementation and iterate TEP offerings based on its growing experience. We applaud the company for using its existing Up & Go Residential Program to test different methods of increasing off-peak charging and using its finding that financial incentives are effective in shifting charging behavior to shape future offerings. We encourage PSE to work on developing TOU rates for different customer segments based on this finding. We look forward to similar learnings as more programs are rolled out and data is collected.

Apply an environmental justice lens to all programs

Transportation electrification provides significant health and economic benefits that everyone should have access to. It is imperative to ensure that low-income communities and communities of color, who are already disproportionately burdened by air pollution and have fewer resources to mitigate harms, experience both direct and indirect benefits from transportation electrification.⁵ We are excited for PSE to expand related offerings such as the Up & Go low-income pilot.

For programs to truly have an impact, they have to address barriers faced by the community and provide options that community members want. Obtaining community trust and support is crucial for transportation electrification programs to succeed and provide benefits to all utility customers. After all, if people are wary and have not bought into the program's purpose, and if they do not see how a program will benefit them, they will rightfully be uninvolved or resistant. That is why it is important to work with partners that are trusted by the community. We appreciate the further detail on community engagement provided in the addendum and believe its implementation will positively shape offerings and engagement.

Ensure public charging and multi-family is accessible and easy to use

Public charging stations play an important role in advancing electric vehicle adoption, not only because they provide a needed resource, but also because they provide more visibility for the technology and assurance that charging is available, alleviating anxiety for potential electric vehicle purchasers. As electric vehicles become more accessible, the infrastructure to support them must as well—especially for those who do not have the ability to charge at home. Experts believe that, as more people utilize electric vehicles, the ratio of these vehicles to public charging stations should be between ten and twenty electric vehicles per station.⁶ Polling also indicates

⁵ Washington State Department of Health, "Washington Environmental Health Disparities Map." <https://fortress.wa.gov/doh/wtn/WTNIBL/>.

⁶ EVAdoption, "What is the 'Minimum Acceptable' Ratio of EVs to Charging Stations?" <https://evadoption.com/what-is-the-ideal-ratio-of-evs-to-charging-stations/>.



that one of the largest concerns about purchasing an electric vehicle is charging infrastructure, with half of drivers worrying about finding a charging station.⁷

We appreciate PSE's existing work to install public chargers with a focus on reaching those who live in multi-family housing and/or without dedicated parking and filling in geographic gaps where there may be charging demand not met by the private market, including for services like ride share. It is good to see from the addendum that PSE recognizes the cost disparity for those who must rely on Level 2 public charging and that demand charges can also be a barrier. We encourage PSE to continue this work and to help provide the visible resource of public chargers. We strongly recommend that as PSE installs chargers, the company ensures there are a variety of payment options and the ability to pay without an app or online registration, even prior to SB 5192 taking effect after rule adoption. Pricing should also be clear to customers. Without these considerations, inequitable barriers to public charging will remain. Similarly, charging installed in multi-family residences should be affordable and easy to use and understand.

Conclusion

Thank you again for the opportunity to provide comments on PSE's TEP. Climate Solutions greatly appreciates the efforts of the utility in developing this plan to increase the adoption of widespread transportation electrification and we support its approval by the Commission. We also appreciate the details offered in the addendum and await the subsequent initial filings for commercial & fleets, residential multi-family, and education & outreach programs later this year. Heavy-duty vehicles and fleets are applications particularly critical for transportation electrification, given their current emissions, but require more support. Similarly, multi-family building residents will benefit from the option of EV ownership or use but often face greater barriers than those living in single-family homes. Thus, we are excited PSE will prioritize these two segments for program offerings in the near term.

Transportation electrification poses a tremendous opportunity to reduce pollution and maximize grid efficiencies, and we believe utilities will play a significant role in the transformation of our transportation sector. We look forward to further engagement with the Commission and with PSE as this TEP is adopted and programs are furthered designed and launched.

Sincerely,

Leah Missik
Washington Transportation Policy Manager
Climate Solutions

⁷ Green Car Reports, "Poll suggests more Americans might buy an EV—if only they had a place to charge"
https://www.greencarreports.com/news/1121698_poll-suggests-more-americans-might-buy-an-ev-if-only-they-had-a-place-to-charge.