

November 23, 2016

VIA ELECTRONIC FILING

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket UE-160799—Pacific Power & Light Company's Comments

In response to the Notice of Opportunity to File Written Comments issued by the Washington Utilities and Transportation Commission (Commission) on November 2, 2016, Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following written comments.

1. Is a rule or policy statement necessary to implement RCW 80.28.360?

Although a policy statement or rule is unnecessary for the Commission to implement RCW 80.28.360, a policy statement could provide guidance to utilities on electric vehicle supply equipment (EVSE) investments. Since the electric vehicle market is still considered to be a new and nascent market, it may be too early to establish precise rules to govern EVSE investments at this time. Pacific Power, however, supports and appreciates the Commission's intent to provide further guidance and clarification to utilities regarding EVSE investments, and believes that a policy statement is an effective avenue to do so.

2. How should the Commission consider whether an investment is eligible for the incentive rate of return?

As discussed in its comments filed on August 16, 2016, Pacific Power proposes that all of the components of an EVSE investment be reviewed as part of a formal filing with the Commission. Utilities would be able to provide the estimated rate impact and other relevant information that demonstrates that the proposed EVSE investment meets the requirements provided under RCW 80.28.360 in that filing. This would enable the Commission to review the details of the utility's proposal and ensure that the proposed projects meet the criteria outlined in the statute.

3. How do other relevant statutes and Commission rules and standards apply to utility investment in EVSE?

Pacific Power views existing statutes, Commission rules, and standards as flexible enough to accommodate utility investment in EVSE. As explained in Pacific Power's previous comments, existing cost-effectiveness tests may not produce the most accurate results as applied to EVSE. In addition, utility investment in EVSE may require clarification from the Commission regarding the application of existing cost recovery mechanisms, specifically as

it relates to the calculation of benefits. Adapting existing statutes, rules, and standards to the unique circumstances of EVSE may be most appropriately considered as part of a future rulemaking or future cost recovery proceedings.

4. Should the Commission consider or adopt other policies to improve access to electric vehicle supply equipment and allow a competitive market for charging services to develop?

In this rapidly changing market, Pacific Power encourages the Commission to maintain flexibility in its EVSE policies. Pacific Power believes it is premature to prescribe the extent of a utility's role in promoting access to EVSE and encourages the Commission to consider each proposed pilot/program on its own merits.

Please direct inquiries to Ariel Son, Regulatory Projects Manager, at (503) 813-5410.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bryce Dalley", with a long horizontal flourish extending to the right.

R. Bryce Dalley
Vice President, Regulation