



**NW Energy Coalition**  
for a clean and affordable energy future

July 30, 2021

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

RE: NW Energy Coalition's comments regarding Puget Sound Energy's Transportation Electrification Plan, Docket No. UE-210191

The NW Energy Coalition appreciates the opportunity to provide comments on PSE's Transportation Electrification Plan. The Transportation Electrification Plan (TE Plan) includes a thorough evaluation of current market conditions. We commend PSE's efforts to advance transportation electrification, especially PSE's guiding principles to create a resilient and modern grid as well as integrate social equity and environmental justice principles. The topics in the plan provide a helpful high-level view into the transportation electrification (TE) market in PSE's service territory and the addendum filed on July 14, 2021 provides important insight into PSE's future tariff filings. Our comments highlight key components of the TE Plan and areas that warrant additional consideration in PSE's subsequent filings, as detailed below.

#### Distribution System Planning and Load Management

We appreciate that the addendum provides further clarify into the steps PSE is taking to prepare its system for new transportation electrification load. This planning is vital in the transition to clean vehicles as a well-designed grid can lower bills for all customers by avoiding expensive system upgrades that provide fewer benefits. **We recommend PSE include the results of their geospatial forecasting tool as well as relevant targeted load management opportunities in their 2022 report.**

The TE Plan's load management component relies heavily on the development of time varying rates and the addendum notes that PSE plans to explore direct load management options. Meanwhile, PSE has already identified the need for demand response resources in its 2021 Integrated Resource Plan.<sup>1</sup> **We strongly urge PSE to integrate direct load control into its 2021 and 2022 tariff filings.**

#### Modeling System Load Impacts

Transportation electrification policy is rapidly evolving in Washington state and TE load forecasts can quickly become outdated. The passage of a Clean Fuel Standard, E3SHB 1091

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<sup>1</sup> PSE's preferred portfolio in the Final 2021 IRP includes 29 MW of Demand Response in 2022-2025, and an additional 167 MW of Demand Response in 2026.

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(2021), and the Department of Ecology’s plan to adopt California’s Zero Emission Vehicle program and Advanced Clean Trucks rule by the end of 2021 will likely result in changes to the load forecast.<sup>23</sup> **We recommend PSE file an updated load forecast on an annual basis, starting in 2022.**

#### PSE’s Investment in Transportation Electrification

Docket UE-160779, Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services, allows utilities to perform societal cost tests to inform program portfolio design. PSE’s TE Plan addendum states that they may include relevant results of societal cost test(s) in the 2024 report. **Instead, NWEAC supports staff’s recommendation that PSE include the results of a societal cost test for PSE’s proposed TE portfolio (including Phase 1 and Phase 2 programs) within the 2021 tariff filing.**

#### Accessible and Affordable Charging

The passage of 2SSB 5192 (2021) will result in increased access to public charging.<sup>4</sup> The bill includes new price transparency and reporting requirements as well as directs the Department of Agriculture, in consultation with the Department of Commerce and Washington Utilities and Transportation Commission, to develop rules determining minimum payment method requirements that support access for all current and future public charging users and interoperability standards. **We strongly encourage PSE and the UTC to engage in this rulemaking and we want to highlight the need for accessible and affordable EV charging for customers living in multifamily housing.**

We appreciate PSE recognizing the significant cost disparity between customers who have access to EV charging at home on a residential rate and customers who do not have access to EV charging at home. As EVs become more prevalent, this cost disparity will disproportionately burden renters, low-income customers, and folks living in multifamily housing. In addition to increasing access at public EV chargers, we encourage PSE to reduce cost disparities and increase access to charging through programs designed to benefit customers living in multi-family housing.

#### Diversity, Equity, and Inclusion (DEI)

NWEAC appreciates PSE’s acknowledgement of past harms to underserved customers, communities of color, and low-income households, commitment to design equitable and inclusive programs, and current work to implement projects that benefit low-income customers. The addendum provides a meaningful plan to integrate equity throughout future tariff filings and a target of approximately 30 percent to be spent towards specific DEI products.

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<sup>2</sup> <https://app.leg.wa.gov/billssummary?BillNumber=1091&Year=2021&Initiative=false>

<sup>3</sup> <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-423-400>

<sup>4</sup> <https://app.leg.wa.gov/billssummary?BillNumber=5192&Initiative=false&Year=2021>

**We look forward to engaging with PSE in the development and prioritization of programs that provide direct benefits to highly impacted communities and vulnerable populations.**

### Reporting

We appreciate the metrics PSE plans to track and report on the performance of their TE portfolio. We understand this is not an exhaustive list and we recommend the addition of the following metrics:

- Increased electrification (EVSE installed) of medium- and heavy-duty fleets and last-mile delivery fleets that serve or operate in highly impacted communities.
- Reduction in vulnerable customers' transportation energy burden.
- Reduction in cost disparities between customers who have access to charging at home (on a residential rate) and customers who don't have access to charging at home.
- Increased school bus electrification.
- Increased transit electrification. It's important that this outcome does not conflict with goals to expand transit. While expanding service hours is outside of the scope of the utility, we recommend tracking annual service hour status of the transit agencies the utility helps electrify to monitor for unintended consequences.
- Supported multiple types of electric transportation technology (i.e., personal vehicles, medium- and heavy-duty vehicles, bikes, forklifts, etc.).
- Increased outreach, capacity building to and participation of highly impacted communities, low-income service providers, community-based and community service organizations, non-profit organizations, small businesses (particularly minority and women owned businesses), and tribes in the development of a utility TE portfolio.
- Peak load curtailed and load shifted to off-peak periods as a result of demand side management program components.
- Avoided distribution and transmission costs and incremental renewable utilization resulting from demand side management program components.

### Conclusion

NWEC appreciates PSE's works to develop this plan and we look forward to engaging in the development of PSE's future TE programs. We support staff's recommendation that the Commission issue a letter acknowledging the TE Plan and encourage PSE to undertake a proactive strategy to effectively enable efficient grid and resource management, increase access to transportation electrification for vulnerable populations and highly impacted communities, and expand programs to accelerate TE market transformation.

Thank you for your consideration of NW Energy Coalition's comments.

Sincerely,

Annabel Drayton  
Policy Associate  
NW Energy Coalition