



WeaveGrid

July 30, 2021

Mr. 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**

Received
Records Management
07/30/21 16:55
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Mr. Johnson:

Weave Grid, Inc. (“WeaveGrid”) is pleased to submit comments to the Washington Utilities and Transportation Commission (“Commission”) in response to its May 26, 2021 Notice of Opportunity to File Written Comments regarding the 2021 Transportation Electrification Plan (“TEP”) filed by Puget Sound Energy (“PSE” and “the Company”).

I. Introduction

WeaveGrid is a vehicle-grid integration (“VGI”) software company that uses vehicle telematics – the intelligence and connectivity already embedded in electric vehicles (“EVs”) – and utility data to offer an interface for utilities to engage with automotive manufacturers and EV drivers. The onboard computer of EVs records and reports charging-related data, such as state of charge (i.e., the energy left in the battery), energy, and power draw, and the communications technology of EVs is employed to read this charging data and manage charging remotely, without a dedicated interface device. By leveraging integrations with automotive manufacturers and gaining authentication from drivers who opt in to share their data securely, WeaveGrid offers utilities both aggregated charging data and the ability to manage charging for enrolled EV customers. WeaveGrid is a market leader in providing these solutions, which are successfully deployed in multiple utility programs across the United States.

II. Comments

WeaveGrid has reviewed Puget Sound Energy's TEP. In our experience, we see many pieces to the puzzle supporting transportation electrification, and it is our view that developing utility TEPs requires significant amounts of work and thoughtfulness, including assessing the opportunity landscape and conducting stakeholder engagement. PSE's TEP is among the most comprehensive TEPs in the country, positioning the Company well to support its customers and meet Washington's goals for electric vehicles. We recommend that the Commission acknowledge the TEP.

At WeaveGrid, we view the role of utilities as essential in supporting the EV market and accelerating EV adoption. Utilities can provide products and services that help customers, including:

- Increasing customer awareness of EV options and familiarity with EV charging needs;
- Improving access to charging infrastructure and helping reduce the costs for customers; and
- Managing the integration of electric vehicles onto the grid, helping ensure that charging is affordable and incentivizing charging during off-peak times.

Puget Sound Energy's TEP recognizes these opportunities and takes a holistic approach to support the market, highlighting the barriers, laying out potential solutions, and identifying areas where PSE is already working and plans to do more. The broad portfolio approach PSE has presented is vital in supporting the EV market.

WeaveGrid agrees with PSE's position that there is a need to continue to expand its breadth of offerings and bring forward new pilots and programs that support transportation electrification.¹ However, it is sometimes easy for utilities and other program implementers to focus on developing new products and services without refining and improving existing ones. We are grateful that PSE, as part of this TEP, acknowledges the need to improve its existing programs, including its residential offerings, continuously.

¹ Puget Sound Energy 2021 Transportation Electrification Plan filed as part of Docket UE-210191, Page 65.

We urge the Commission to provide PSE significant budget flexibility in implementing this TEP to allow the Company to support the EV market where it is at over time. It is difficult to predict with certainty the pace of EV adoption, the program participation from varying market segments, and the benefits accrued by the various programs. Utilities can provide greater benefits to their customers by being able to move funds between programs over the course of the TEP. Other commissions have approved budget flexibility proposals for utilities implementing customer programs. For instance, the Colorado Public Utilities Commission recently approved Xcel Energy's proposal for budget flexibility, allowing the utility to increase the overall TEP budget to up to 125 percent of the annual estimated costs and move funds between transportation electrification programs.² This concept was influenced by best practices for demand-side management programs. We believe that this type of budget flexibility can help PSE be forward-looking in their TEP while adapting to market needs.

For residential programs, WeaveGrid supports PSE's approach to improving access to charging infrastructure, encouraging off-peak charging, and exploring load management approaches while being mindful of the customer experience.³ Many utility programs have been technology agnostic in their approach to managed charging, surveying several types of technologies that can provide managed charging, including charging equipment, onboard devices, and vehicle telematics. We appreciate that PSE has sought to pilot innovative approaches to managed charging while meeting the needs of its customers and the grid.

As a company that focuses on connecting utilities with automakers and EV drivers via vehicle telematics, WeaveGrid believes solutions leveraging vehicle telematics can complement other utility offerings well and provide significant advantages for program design and benefits for customers, including:

- **Improved data.** Vehicle telematics does not just indicate whether a vehicle is charging and the amount of demand and energy for charging at one location but also provides information on where the car is charging and, importantly, the state of charge. Vehicle

² Colorado Public Utilities Commission, Proceeding No. 20A-0204E, Commission Decision Granting Application With Modification In the Matter of the Application of Public Service Company of Colorado for Approval of Its 2021-2023 Transportation Electrification Plan, adopted December 23, 2020, Page 16.

³ PSE TEP, Table 5 on Page 67.

telematics can also be used for monitoring EV consumption and billing purposes (sometimes referred to as sub-metering). Baltimore Gas and Electric in Maryland, for instance, has been working with WeaveGrid to use the vehicles' measured energy consumption for participation in an EV-only time-varying rate.

- **Increased access.** Telematics offers more choices in charging for customers participating in managed charging programs. While telematics solutions are compatible with networked Level 2 charging, customers who are renting homes or are using non-networked and/or Level 1 charging can still participate in managed charging programs using vehicle telematics. With no physical installation requirements, vehicle telematics-based programs can be easy to enroll in; in some programs where utilities work with WeaveGrid, drivers enroll in no more than ninety seconds.
- **Enhanced control.** Using telematics, utilities have the potential to attract more participants and also generate more significant benefits for the grid; with data showing where the vehicles are charging and the state of charge, utilities can seek to optimize charging while having the appropriate visibility and user controls such that the cars and trucks can be fully charged to drivers' needs.

Over the course of PSE's TEP, vehicle telematics is well-positioned to support programs with high levels of participation. This space is evolving quickly with utilities, including Exelon, Xcel Energy, Pacific Gas and Electric, National Grid, and DTE Energy, deploying programs using telematics targeting thousands of participants while partnering with automakers and technology companies like WeaveGrid. We are encouraged that PSE continues to explore offering these types of solutions to its customers⁴ and believe that these programs can complement other efforts highlighted in PSE's plan.

III. Recommendations

Overall, WeaveGrid is highly supportive of PSE's TEP and recognizes the TEP as among the most comprehensive in the country. We recommend that:

- The Commission acknowledges PSE's TEP.

⁴Puget Sound Energy Addendum to Puget Sound Energy 2021 Transportation Electrification Plan filed as part of docket UE-210191, Pages 4-8.

- The Commission considers providing PSE budget flexibility while implementing the pilots and programs highlighted in the TEP.

IV. Conclusion

WeaveGrid appreciates PSE's effort to develop a comprehensive and holistic TEP. We believe the TEP offers valuable insights on the market and PSE's strategy for supporting transportation electrification. We look forward to continued engagement and thank the Commission for consideration of these comments.

Respectfully submitted,

/s/ Mathias Bell

Mathias Bell
Director of Policy and Regulatory Affairs
Weave Grid, Inc.
222 7th Street, 2nd floor
San Francisco, CA 94103
Email: mathias@weavegrid.com
Phone: 650-590-9021