Re: Electric Vehicle Supply Equipment Regulations Draft Nov. 19, 2021 - Comments of Avista Utilities

Dear Ms. Robinson,

Avista Utilities appreciates the opportunity to comment on the Nov. 19, 2021 draft rules related to electric vehicle supply equipment regulations, WAC 16-662-200, 210 and 215.

GENERAL COMMENTS

Avista Utilities is an electric and natural gas service provider based in Spokane. We serve nearly 400,000 electric customers and 365,000 natural gas customers in Washington, Idaho and Oregon.

Avista has developed a comprehensive transportation electrification program in its Washington service area, through which our utility acts as an electric vehicle supply equipment developer and operator. We also work to provide our customers with electrified transportation solutions to meet their transportation needs, including EV charging services, transportation support for low-income service agencies, and, most recently, electrification of transit services. Avista’s efforts are guided by our learnings from a three-year pilot project, during which we invested more than $3 million in EV infrastructure in our service area, including the installation of nearly 450 charging ports.

Our transportation electrification plan calls for the installation of hundreds of additional charging outlets, but the extent of our effort will depend a great deal on the provisions of this rulemaking. Adding costs to EVSE investments may limit the scope of new charging infrastructure buildout at a time when much more is needed to facilitate this transition to a cleaner transportation system. A balance must be achieved to ensure any additional costs through mandated EV charger capabilities provide a commensurate benefit to EV consumers, without unnecessarily limiting EVSE development.
We offer the following comments to the draft rule.

**WAC 16-662-200**

We propose the following clarifying amendments to WAC 16-662-200 subsection (1):

“(1) Any publicly available electric vehicle supply equipment subject to WAC 16-662-210 and WAC 16-662-215 that is eligible for a delayed compliance date based on installation dates specified under subsection (2) of this section must be clearly marked...:

This is intended to clarify that the section pertains to publicly available EVSE that is subject to the provisions of this rulemaking.

Additionally, the enacting legislation provides the Department of Agriculture discretion on the start date for compliance for both DC fast chargers and Level 2 EVSE. While the specifications for DC fast chargers is more uniform, Avista is concerned that the specifications of Level 2 EVSE on the market can vary and it may take additional time for equipment and consumer preferences in the use of this equipment to be standardized. We would propose the compliance with Level 2 EVSE apply to chargers installed on or after Dec. 31, 2025. This provides more time for the market to mature and avoid unnecessary capital costs that may not meet with evolving consumer preferences.

**WAC 16-662-210**

Avista appreciates the flexibility offered in this section of the draft rule, offering a list of allowable payment methods from which an EVSE developer can choose. We would reiterate the importance of ensuring these standards do not impose costs that will incumber EVSE installations.

Avista would propose the following amendment to WAC 16-662-210 subsection (2):

“(2) The electric vehicle supply equipment must provide means for conducting a charging session in at least one languages other than English, through either the equipment or mobile app user interface screen”

Avista serves a diverse service area. In some locations, offering charging services in several languages is certainly appropriate. In other areas, offering charging services in one additional language may be appropriate. This revision provides the EVSE developer to offer services appropriate to each location without incurring unnecessary costs. In addition, we propose that either the equipment or mobile app user interface screen that supports the alternative language is sufficient to comply with this requirement, as many equipment providers have limited interface screen capabilities.

Avista supports the language in WAC 16-662-210 subsection (3).

**WAC 16-662-215**
Avista supports the proposed language in WAC 16-662-215 to ensure interoperability and reliability to enhance the EV consumer experience.

We appreciate the opportunity to offer comments on this draft rule and look forward to continued engagement in this rulemaking.

Sincerely,

/s/ Rendall Farley
Rendall Farley
Manager, Electric Transportation
Avista Corp.