December 6, 2021

Washington State Department of Agriculture
Weights and Measures Program
P.O. Box 42560
Olympia, WA 98504-2650

Re: Climate Solutions comments on draft rule language for the Electric Vehicle Supply Equipment regulations

Dear Tim Elliott,

Climate Solutions thanks you for the opportunity to submit comments regarding draft rule language for Chapter 16-662 WAC, the Electric Vehicle Supply Equipment regulations. 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.

A key piece of the underlying legislation, SB 5192, was to ensure “minimum required payment methods [are] convenient and reasonably support access for all current and future users” of public electric vehicle chargers (or electric vehicle supply equipment, “EVSE”). Just as it is straightforward to fuel a vehicle at a gas station today, with multiple, standard payment methods and clear pricing, it should be at public EVSE.

Standardization and certainty are critical in supporting a growing electric vehicle (“EV”) market to meet our state’s statutory climate goals. Washington has aligned with California and Oregon on multiple clean transportation policies recently, including the Zero Emission Vehicle Mandate. This policy is one of the reasons why California is currently the largest EV market in the country. Notably, the California Air Resources Board found it necessary to standardize public EVSE payment options by requiring a minimum of three payment methods: mobile payment, a toll-free number, and a credit card reader physically located on the EVSE or a kiosk serving it. Given that the vast majority of people are used to paying for fueling their vehicle via a credit or debit card, it is important that Washington’s forthcoming regulations provide for similar, commonly understood and simple transactions.

The shared draft rules would not necessarily lead to user certainty with the current “choose any three” approach. Though the current draft specifies one of these methods must include payment by charge card, it includes the option to pay by number. This is cumbersome for users and may lead to security concerns.

Thus, we strongly recommend that Washington align with California’s approach as outlined in their EVSE Standards, § 2360.2, “Payment Method Requirements for Electric Vehicle Supply Equipment.” Not only will this benefit Washington residents by providing more certainty and ease in fueling their EVs here at home, but will
also help create alignment and a shared user experience along the West Coast as states together pursue policies to expand EVs.

We are happy to discuss any of our thoughts further and answer questions. Thank you for your important work on this rulemaking.

Sincerely,

[Signature]

Washington Transportation Policy Manager
Climate Solutions