RE: EVCA Comments on SB 5192 Draft Rule

Dear Mr. Elliot,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to provide feedback on Washington State Department of Agriculture’s (WSDA) rulemaking Chapter 16-662 WAC regarding rules for publicly available EV charging stations, as outlined in Senate Bill 5192 (SB 5192).

EVCA is a not-for-profit trade organization of twelve leading EV charging industry member companies and one zero-emission autonomous fleet operator. EVCA’s mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

The regulations currently under consideration in Chapter 16-662 WAC, as they relate to electric vehicle supply equipment (EVSE), will directly impact operations and costs for future EVSE deployed in the State of Washington. We have reviewed the draft text released on November 19th and submit the following comments for consideration.

I. EVCA Supports WSDA’s Proposed Payment Standards

Section 5 of SB 5192 directs Washington State Department of Agriculture (WSDA) to “adopt rules requiring all electric vehicle service providers to make available multiple payment methods.” It specifies further for WSDA to “minimize cost and maximize benefits to the public.”
This phrase in particular directly states the need for WSDA to balance its regulation by keeping these two factors in mind.

EVCA supports WSDA’s proposed language, which requires charging companies to choose at least three payment methods, of which one must include payment by charge card (debit, credit, and pre-paid). We appreciate the Department’s response to stakeholder input and the recognition for the need to strike the right balance between these requirements. We believe that this proposal allows WSDA the ability to both honor the goals set forth by SB 5192, while still offering site hosts the flexibility to choose the methods appropriate for them and their consumers.

II. **EVCA supports WSDA’s Proposed Roaming Interoperability Standards**

The proposed requirements to adopt Open Charge Point Interface (OCPI) achieve SB 5192’s goal of roaming interoperability, while allowing flexibility to charging networks to use the version best suited to their customer’s needs. Consumers need a simple and seamless way to move between charging networks – OCPI fulfills this need. We applaud WSDA’s practical approach to implementing this requirement.

EVCA appreciates your consideration of our recommendations and the opportunity to provide comments on this rulemaking. We look forward to continued engagement throughout the remainder of this stakeholder process.

Sincerely,

Dylan Jaff
Government Affairs
Electric Vehicle Charging Association