Dear Tim,

Thank you for the opportunity to provide comment on behalf of Electrify America regarding the proposed payment method standards for EV chargers in Washington. Electrify America recognizes the emphasis on conformance with the underlying statute in the approach to developing these standards, and the emerging consensus around the three payment methods specifically contemplated in the bill.

Electrify America supports limiting the required payment method standards to credit card readers, mobile app, and toll-free number, as standards that accomplish all of the bill’s underlying objectives while creating a clear and consistent path to compliance for EVSPs. Not only do these options provide multiple convenient methods of payment for EV drivers, but they specifically provide options that facilitate charging sessions for low and moderate income individuals, the unbanked or underbanked, those who do not own a smartphone, and those who wish to conduct a charging session in a language other than English. Furthermore, they provide these benefits without substantial new costs or burdens on much of the badly-needed charging infrastructure that has already been installed in Washington State.

We offer some specific additional feedback in response to topics raised on the last stakeholder call:

**Credit Card Usage Rates**
- Electrify America publishes information on credit card usage rates in its annual report, the latest version of which can be found on our website [here](#).
- On page 11 of the 2020 annual report, Electrify America reported that:
  - “In order to ensure that the Electrify America network is open and accessible to customers regardless of the brand of vehicle they drive or their charging network...
membership, Electrify America’s public DC fast charging stations accept credit and debit card payments via a card reader on every charger. However, Electrify America users increasingly preferred app activation in 2020, with only 24% of sessions activated by credit or debit card, down from 34% in Q4 2019.”

**Typical Bills for EV Charging**
- Electrify America provides a receipt for every charging session that indicates the location, charging time, energy delivered, pricing structure, idling time, and total cost of the session.
- An overview of the simple, transparent pricing structure in each state is available on our website at [https://www.electrifyamerica.com/pricing/](https://www.electrifyamerica.com/pricing/).
- We would be happy to schedule a brief meeting to walk through a typical EV charging bill at your availability.

**Payment Methods**
- As stated above, Electrify America supports establishing credit card readers, mobile app activation, and a toll-free number as the minimum required standards for payment methods, consistent with the methods contemplated in statute.
- “Interoperability” cannot be considered a mandatory payment method due to the underlying statute, which states that requirements “shall not require that companies maintain interoperability agreements with other companies.”
- RFID cards are a payment method that was common in the EV charging industry several years ago, but which is declining in use over time. Credit cards, in comparison to network-specific RFID cards that have to be obtained by mail, represent a far more universal means of payment to initiate charging, while mobile apps and emerging technologies like Plug&Charge offer greater flexibility and more features. The Washington standards should not require that EVSPs implement or maintain payment methods that are naturally becoming obsolete due to technological development.
- Plug&Charge is an innovative standard that makes the charging experience as seamless as possible by initiating a charging session automatically as soon as a vehicle is plugged in. If the proposed standards include requiring a certain number of optional payment methods, Plug&Charge should be eligible to count towards the optional methods.
- All Electrify America stations include a credit card reader, which is capable of accepting prepaid credit/debit cards. Anyone who is able to purchase a prepaid credit/debit card from a retailer using cash will be able to use the charging stations via this feature.
  - This option provides a straightforward path for the unbanked/underbanked – as well as low income individuals who may not have access to a smartphone app – to activate charging sessions on the stations.
  - While prepaid cards can easily be bought for cash at retailers, accepting cash payment directly at charging stations would be extremely burdensome. Existing charging equipment is not equipped to handle cash payments directly, and collecting cash from charging stations as well as modifying station design to accept cash and prevent vandalism would be difficult and costly. Prepaid cards therefore represent the most reasonable path towards accommodating unbanked/underbanked customers.
  - Electrify America opposes a requirement that site hosts be required to sell prepaid
cards, as EVSPs have no ability to compel site hosts, who are not regulated under this statute, to make product decisions. Prepaid cards are widely available in commerce and commonly sold at locations such as convenience stores, grocery stores, and large retailers.

- Similarly, Electrify America opposes a requirement that site hosts be required to accept cash payment for charging sessions. Unlike gas stations, where an attendant inside the store has the ability to activate pumps following cash payment, site hosts have neither the technical capability to activate charging equipment nor the financial relationships to remit payment to charging providers. This would be an extremely burdensome requirement to implement, technically, financially, and legally, and is unnecessary to meet the end goal of serving unbanked or underbanked customers, which is easily met using prepaid cards.

**Deadlines**

- Deadlines should take into account the length of the EV charging station development cycle to avoid affect projects that are already in development and equipment that has already been procured. Given the two-year development cycle for many EV charging projects, a minimum of three years is reasonable.
- Any future changes to the payment methods – and increasing number and complexity of requirements in general – will add to the burden on the charging industry to come into compliance and may necessitate longer lead times to avoid disruption to charger installations.
- Deadlines should be based on install date, not operation or in-service date. Equipment has often been bought and installed well in advance of charger commissioning, and should be considered compliant if it was compliant at its install date.

- Once again, Electrify America appreciates the opportunity to comment and to continue to support the development of these requirements for the State of Washington.

Regards,

**Andrew Dick**  
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