Hi Tim,

NWEC’s comments regarding Section 7 and 8 of 2SSB 5192 are relatively short so I’ve included them below. Please feel free to add this email to the rulemaking webpage.

**RCW 19.94.575 (Section 7 of 2SSB 5192)**

The statute requires that service providers report their information, equipment inventory for both active and retired, decommissioned, or removed equipment in Washington, and payment information at least once per year. Is there any additional information, besides what is currently required, that should be reported to NREL? Thoughts on mirroring California’s reporting list?

RCW 19.94.575 provides a nonexclusive list of items that should be reported but does not provide any guidance on how EVSPs should report this information. Since there is value in a consistent approach to reporting and further guidance is likely needed, NWEC recommends WSDA adopt California’s requirements for reporting to the National Renewable Energy Laboratory (NREL) Alternative Fuels Data Center (AFDC).

**RCW 19.94.175 (Section 8 of 2SSB 5192)**

RCW 19.94.175(2) was amended to provide WSDA the ability to establish additional fees to cover the remaining costs. Additional fees will be required, but the department is still analyzing what those fees will need to look like in order to cover the remaining costs associated with implementing and enforcing both the statute and the rule. Initial thoughts or relative information we should know? Consideration of differential fees to reduce the potential burden of the registration fee for service providers operating less than 25 publicly available charging stations in Washington.

NWEC recommends WSDA provide an estimate of annual revenue from the base fee established in RCW 19.94.175(1)(h) and the total anticipated cost to oversee EVSE related items within the Weights and Measures Program. This information may help stakeholders weigh in with more specific input on this topic.

Thank you,

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