Mr. Tim Elliott  
Washington State Department of Agriculture  
Weights and Measures Program  
1111 Washington ST SE  
Olympia, WA 98504-2560  
Via email: TElliot@agr.wa.gov

Re: Stakeholder feedback on WSDA multiple payment option requirement outlined in 2SSB 5192

Dear Mr. Elliott,

Plug In America is a nationwide 501C3 non-profit working to accelerate the shift to plug-in vehicles powered by clean, affordable, domestic electricity to reduce our nation's dependence on petroleum and improve the global environment. As the organization representing the more than fifty thousand Washington State EV drivers and millions of potential future consumers of plug-in hybrids and fully electric vehicles, we strongly support your proposed EVSE rulemaking outlined in 2SSB 5192.

Plug In America was one of the original supporters of California State Senator Ellen Corbett’s SB 454 (2013). Our goal was to make charging an EV as simple for a consumer as filling your tank with gasoline. We wish to thank WSDA staff for moving the concept of real open access for EV charging in Washington so much closer to fruition. We also support the comments of NW Energy Coalition, UCS, and NRDC especially concerning the availability of open access card readers on publicly available EVSE. The ability for any EV driver to pull up at a charging station and access EV charging through the simple use of a credit, debit, or cash (prepaid) card not only gives them a familiar fueling experience, but it makes access to driving an EV available to all.

In Washington one of the key goals of this law and requisite rulemaking is the need for more open access in disadvantaged communities. We hope that it will be addressed in the regulatory process and during the implementation phase. Disadvantaged communities are disproportionately impacted by the lack of credit/debit/prepaid card readers on EV chargers. According to the FDIC, more than 20% of all of Washington households are either unbanked or underbanked.1 This number is even larger for minority and underserved communities. We are certain you will hear from other parties that adding card readers will create increased expenses for EVSE providers, but the clear intention of SB 5192 is to provide open access to all. So called

“tap” credit cards are not yet available as “cash” or prepaid cards and EMV chip cards are likely to remain the dominant form of all payment cards for years to come. Many prepaid cards are still using magnetic stripe technology, so while the industry would have you believe that rapid adoption is likely, it is much more likely that consumers, especially in underserved communities, will still be using the “next generation” EMV chip technology well into the later part of the decade. Simply stated - as long as gas stations continue to accept EMV chip cards, EVSEs should as well.

We are just reaching the point where used EVs are becoming affordable for underserved communities and the state is making considerable investments to help make this happen. Prepaid cards widely available at grocery and convenience stores can help mitigate this issue with 20.7% of unbanked or underbanked households using them for a variety of purchases.² This is why Plug In America believes that card readers on EV chargers are a ubiquitous solution for all EV drivers and why we are providing this direct feedback for the rulemaking. In order to send the strongest possible signal to the market, we also believe that WSDA should encourage incentives to reward early adoption of card readers prior to the implementation dates, especially in disadvantaged communities, via both internal WA state programs and working with other State agencies.

We appreciate your consideration of our recommendations as you further refine the proposed rulemaking.

Sincerely,

Jay Friedland
Senior Policy Advisor
Plug In America

cc: Amy Clow, Quarantine and Rules Coordinator, WSDA
Andrew Rector, Regulatory Analyst, Utilities and Transportation Commission
Colton Misono, Energy Policy Advisor, Utilities and Transportation Commission
Michael Breish, Senior Energy Policy Specialist, Department of Commerce
Jeff Finn, Legislative Advisor, Plug In America
Peter Chipman, Policy Director, Plug In America

² Federal Deposit Insurance Corporation, The 2017 National Survey of Unbanked and Underbanked Households, https://economicinclusion.gov/surveys/2017household/prepaid-cards-findings/