Stakeholder Information (please provide):

- Name: Tacoma Power
- Contact information: Katherine Rice, krice@cityoftacoma.org; Cam LeHouillier, clehouillier@cityoftacoma.org
- Type of stakeholder: Electric utility

General Information – Please provide the following related to Section 6:

1. **What:** Any end goals, objectives, or issues needing to be addressed within the scope of the statute. What is the problem trying to be solved or the benefit trying to be achieved?

   EV chargers installed in our community need to be easily accessible and reliable for EV drivers. Due to the early stages of the market, a number of EVSE providers offer various charging services, software, and hardware. We need to ensure that all EVSE operators offer the same level of service and access to customers using EVSE and that all EVSE meets required national and international standards for operation.

   In Section 6 subsection 4, the language states “requirements of this section shall not apply to publicly available electric vehicle supply equipment provided by a manufacturer of electric vehicles for the exclusive use by vehicles it manufactures.” A proprietary charging model limits access to EV charging for all EV drivers. We believe this model should be discouraged in the EVSE community if we are to pursue a fully electric transportation future. By omitting these EVSE service providers from the statute, we are making exceptions for select communities and a subsect of EV drivers.

2. **How to achieve:** Any ideas for proposed language that meets the requirements of the statute and achieves objectives?

   Not at this time. We would like to discuss in the upcoming rulemaking work sessions.

3. **Other:** Anything else we should know? How does it affect you?

   As an electric utility and strong advocate for transportation electrification, Tacoma Power wants to ensure reliable and accessible EVSE service to all customers charging in our service territory. Interoperability standards protect both the EV driver using the charging station and promoters of electric vehicles, ensuring a smooth customer experience and charging session. Limiting issues with charging sessions for customers is crucial to expansive EV adoption in the coming years.

Section 6 Specifics – Please provide input for the following areas:

- **What should we be trying to achieve?**
  A WA statute that is in line with national and international standards, and incorporates market trends and lessons learned from other state regulations.

- **Which national and international best practices/standards should we be considering aligning the rule with?** OCPI? OCPP? Others? A combination of multiple standards?
  Tacoma Power would like to discuss the differences between OCPI and OCPP with the rulemaking group in order to determine which rule best fits the goal of the statute. We hope this will be on the agenda in the upcoming rulemaking session. In addition, a combination of multiple standards could prove confusing to EVSE providers. This new statute should align with
the already existing market and standards for EV charging stations rather than creating a new or combination of new standards.

- When selecting the standards that this rule will align with:
  - What version? Does a specific version need to be specified or can other requirements be used to meet this requirement and maintain flexibility?
    
    Tacoma Power would like to discuss this with the larger rulemaking group.

- Considering that California has already adopted certain standards, what should we be considering regarding standards that may not align exactly with theirs?
  
  The WA EV atmosphere is at a different point in the adoption phase than CA. Our standards should align with national and international standards, and we should incorporate lessons learned from CA statutes that may improve our language.

### Text from Statute for Reference

NEW SECTION. Sec. 6. A new section is added to chapter 19.94 RCW to read as follows:

(1) Interoperability standards provide safeguards to consumers and support access to electric vehicle supply equipment. In order for Washington to have reliable, accessible, and competitive markets for electric vehicle supply equipment that are necessary for the movement of goods and people by electric vehicles, interoperability standards that align with national and international best practices or standards are necessary.

(2) By January 1, 2023, the department, in consultation with the department of commerce and the Washington utilities and transportation commission, must adopt rules establishing requirements for all electric vehicle service providers to, at a minimum, meet and maintain nonproprietary interoperability standards for publicly available level 2 electric vehicle supply equipment and direct current fast charger electric vehicle supply equipment and may review and, if necessary, amend the rules every two years, to maintain consistency with evolving technology. The requirements shall not provide that any charging provider must purchase or license proprietary technology or software from any other company, and shall not require that companies maintain interoperability agreements with other companies.

(3) For the purpose of this section, "interoperability" means the ability of hardware, software, or a communications network provided by one party, vendor, or service provider to interact with or exchange and make use of information, including payment information, between hardware, software, or a communications network provided by a different party, vendor, or service provider.

(4) The requirements of this section shall not apply to publicly available electric vehicle supply equipment provided by a manufacturer of electric vehicles for the exclusive use by vehicles it manufactures.