**Stakeholder Information (please provide):**

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

**Please respond to the draft rules:**

We would like to know your response to the draft language to help us as we move forward in their development. The more detail the better you are able to provide the better.

**For each section:**

- If you’re not in support of the current draft language, please provide what the issue is and if you have any suggestions on how to improve it.
- If you’re in support of the current draft language, please make note of the aspects you support as currently written and if you have any additional suggested improvements.
- If you don’t have a strong opinion either way but you have suggestions for improvements, please provide them.

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**Tacoma Power Comments**

**Section WAC 16-662-200**

No new comments.

**Section WAC 16-662-210**

Tacoma Power is supportive of the intent of the rule language written in regards to payment methods. The rule as written provides options for EVSE providers to meet the requirements of the rule. Specifically, we support the options provided in the rule for meeting the payment requirements. The statute is permissive in the number of charging options and does not specify a minimum of three alternatives. With a requirement of three of six options, the rule goes beyond what is required in statute. The number of options must remain the discretion of the EV Service provider. Varieties of the outlined payment methods are largely available on the market, which will ensure a smooth adjustment period.

Tacoma Power does not support mandating credit card readers on EVSE due to vulnerability of these systems to tampering and fraud. The bill as passed reads that “Payment methods may include, but are not limited to.” Credit card readers on EVSE should be an option available for EVSE companies to comply with the law but should not be mandated. We request that the Director shares formally requested payment methods in item F with the public to provide stakeholders an adequate comment period and allow for feedback before implementation.

In the payment methods list as written, the difference between items C and D is unclear. What is the difference between “mobile payment” and “mobile wallet”? Would the use of apple pay or other similar modes of payment qualify here?

Tacoma Power advocates that apps associated with EVSE services be considered as an acceptable payment method in this list. The use of this payment method is widely accepted by EV drivers and is proven as a successful way to pay at EVSE stations.
Tacoma Power is supportive of exploring adding ISO 15118 Plug&Charge (PnC) as a possible payment option in the SB5192 draft language. PnC is supported by multiple EV manufacturers and CPOs, and streamlines the payment process for EV drivers. Has AGR considered this payment method in the list of acceptable methods?

Tacoma Power is also supportive of EVSE equipment that accounts for community language considerations and agrees that EVSE providers should consider the demographics of their area when configuring language settings on chargers. Absent a test or methodology prescribed by the department, any analysis or selection of language performed by an electric vehicle provider shall be deemed by the department to be sufficient to comply. We also request clarity around the parameters of the designated “area” served by the EVSE, which will need to meet the language requirements. We should be specific in terms of what “area” pertains to around the EVSE.

**Section WAC 16-662-215**

Our comments on this section are consistent with those provided in December 2021:

In regards to interoperability requirements related to EVSE, Tacoma Power feels that adopted requirements should align with the already existing market and standards for EVSE, rather than creating a new standard or combination of standards.

The statute indicates that WUTC, Commerce and Agriculture will establish a consistent set of standards. Does this rule language reflect the consensus approach established in Sec 6 (2)?