Topics

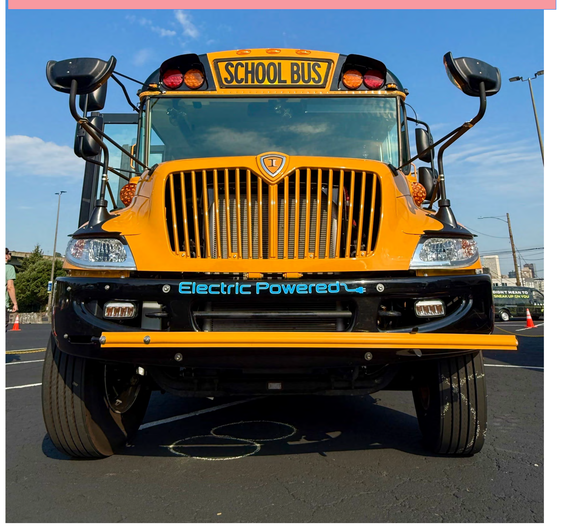
Making housing stock EV-capable

Utility revenue spending on EV charging and interconnection

Maximizing capacity credits

Decarbonizing electricity generation

Environmental justice considerations and additional considerations



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1. Making housing stock EV-capable

Background: Public chargers in WA have a utilization rate of 14-16%, so most EV charging happens at home.

Questions:

1. **At-home charging readiness**:
   a. What can the CFS support utilities in doing? E.g. installing Level 2 chargers, panel upgrades, meter collars (need to be approved by utility, could be incentivized through revenue requirements)
   b. What can the CFS support non-utility participants in doing?
2. **Multifamily charging**:
   a. What are the primary barriers?
   b. Where can the CFS help?

Local government | Electric and gas utilities | Fuel producers, distributors, and wholesalers | Community member | Environmental justice / climate / clean transportation organization | Credit aggregators | Tribal representative | Public transit agencies and ports | Electric vehicle producers and charging infrastructure providers | Other - please identify

Sticky note

2a: not all homes can install chargers due to local infrstructure issues of power distribution

Widespread electrification depends on long-term investment in grid infrastructure, utility coordination, and charging reliability.

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Utilities can help inform customers about the costs and benefits of EV ownership. Provide L2 EV Charger rebates & TOU rates including separately metered EV rates.

Not housing, but as a public entity, we've run into issues installing chargers in certain areas due to an underpowered and aging grid. Grid capability surveys have led to delays in our installation of chargers

Historically, utilities have not been able to "future" proof the grid. When it comes to TE investments, we need the ability to size the distribution system to meet the demands of electric vehicles. Policy to help governing bodies and rate payer advocacy groups feel more comfortable in this area would help utilities build out future growth in electrification.

👍 4

Support vehicle to grid integration

Do things outside of CFS like building codes

2a. Installing hundreds of individual L2 chargers in a condo can be a challenge on the grid.

1a. Helping utilities provide more education to homeowners on their ability to use existing outlets as L1 chargers and the value or use case for upgrading to L2; education for landlords of small properties (i.e., 1-3 units) on the value of providing EV charging and offering support (financial or education) to facilitate this.

1b. Similarly, more education on charging (L1/L2) and the value add in helping household save money on transportation fueling.

2a. It would be helpful to have an inventory of "easy to electrify" MFH. In our experience, parking garages are easier, while garden style (i.e., parking lots) are more expensive/difficult to electrify as they don't have the power capacity to support more than 6 L2 chargers. Helping building owners understand their power capacity and how many L1 or L2 chargers they could add with little or no electrical upgrades would be a good way to get the low-hanging fruit. For older buildings or large installations that require transformer upgrades, funneling them to incentive programs might make sense.

2b. Again, education is critical to adoption. There are so many myths around EVs and who benefits from them. Providing education about the affordability benefits of EVs to MFH -- including best practices for building owner pricing to maintain the affordability of residential rates-- is critical.

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2

Previous comments provided to Ecology

2. Utility revenue spending on EV charging and interconnection

Background: There are many barriers to rapid EV charger installation. Interconnection is a challenge, especially the time it takes for a project to be ready to install the charger.

Questions:
Would electric utilities be willing to prioritize revenue investment on at-home charger readiness in single-family homes?

- What about multifamily?
- What about using part of the revenue for solar power installations at homes that have EVs?

How can utilities prioritize revenue investment in grid decarbonization through renewable electricity generation, for example residential solar, time-use-charging, or vehicle-to-grid charging?

Would electric utilities be open to the putting a portion of CFS residential EV charging credit revenue to go into a state-wide fund for use on providing funding for:

- EV charger installation
- Interconnection readiness

If so, how could a fund be managed?

- By a joint-utility group
- By a third-party
- By Ecology
- Other – please suggest option

Local government | Electric and gas utilities | Fuel producers, distributors, and wholesalers | Community member | Environmental justice / climate / clean transportation organization | Credit aggregators | Tribal representative | Public transit agencies and ports | Electric vehicle producers and charging infrastructure providers | Other - please identify

Require a percentage of utility spending to go towards EV rebates and encourage or require partnership between utilities and OEMs, similar to LCFS holdback funds

Require or strongly encourage utilities to partner with public transit agencies to convert transit fleets to zero emission vehicles

Provide monies to help low income people purchase EVs?

If utilities receive credit revenue, they should be required to reinvest that revenue in ways that reward the EV buyer and grow the market/use of electricity as a clean transportation fuel. Funding EV purchase rebates is the clear choice for maximum impact and would be most closely aligned with the principles animating the CFS.

However, in our view we should revisit the premise that utilities receive residential credits. More on this in the "charging station parking lot" below.

👍 4 👎 4

How do you prioritize who gets a solar installation? power providers lose profit from distribution when solar is installed. Statewide net metering program for return on investment for both power providers and customerss.

Utility transparency: there should be clear reporting, by either Ecology or the utilities, on how credit revenue is being directed towards electrification.

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Participation in CFP is voluntary for electric utilities. Flexibility and certainty in program design from Ecology will help ensure utilities understand how to invest funds accordingly. Credit price stability is key and ensuring reporting doesn't overlap with existing requirements lowers program admin costs so funds can go to where they're needed most.

👍 4

There are concerns about use of energy for data centers, for diverting energy from local users.

Beyond transparency, is there a public process where stakeholders can provide ideas and feedback on proposed spending plans for holdback funds? How can Ecology mandate best practices to ensure those funds are spent effectively?

👍 2

The idea of part of the CFS from all (or just the large) utilities being directed to a joint fund of revenue has advantages. The revenue fund can then be used to further electrification efforts in a consistent way. The use of the revenue retained by the utilities (ex holdback) should also be reported. Administration of the fund is best done by Ecology, who can coordinate the use with other electrification efforts in the state led by other actors. Close attention should be paid to equity, such as determining shares of the fund going to disadvantaged communities or incipient markets

👀 1

Participation for utilities is voluntary, and backstop aggregators are ahead of vehicle OEMs for credit claims -- not a real backstop. ECY should revise priority order for residential holdback credits and allow vehicle OEMs to be on equal foot to utilities for credit claims -- with clear guidance on how funds should be spent.

👎 2

is there a difference in ev charging credit between in state, out of state, and municipal owned utililties that is known within the provider districts? How does this differ between metro and rural areas and can

Would like to know how new fund would target interconnection readiness

👍 2

How would fund improve interconnection timelines and costs across utilities in WA

CFS spending requirements are outlined by ECY guidance. Are these prioritizations missing from the CFS residential spending requirements? If so, they could be added to guidance documents.

Transportation electrification plans must be approved by the UTC or governing body.

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Electric utilities in WA are best placed to maximize CFS credits to invest in overburdened communities, grid modernization and readiness

👍 3

Encourage the timely expenditure of holdback funds by utilities. The hesitancy or delay in expenditure is directly tied to the glut of biofuels driving down the value of credits.

👍 4

Encourage pooling of holdback funds to facilitate timely expenditure according to best practices in cases where utilities don't have a clear plan to monetize and spend credits promptly...most critical time for investment is right now

3

Previous comments provided to Ecology

3. Maximizing capacity credits

Background: To better support EV charger installation in the state, how can we support/encourage more uptake of capacity credits?

Questions:

1. Are there barriers in the current capacity credit application process that are preventing/ discouraging you from applying?
2. Are there specific locations or types of chargers that you have observed being more or less utilized?
3. How do you view the state of the "chicken-or-egg" problem of public charging infrastructure and electric vehicles? Are there still problems with utilization of new public charging? In your experience, how many years does it take for a new public DC fast charger to get to around 20% utilization?

The cost reporting requirements for capacity credits - while understandable - can be cumbersome and administratively burdensome. Uptime does not take into account cable theft and is not always a clear marker for charger reliability

👍 2

2-4 years depending on location

Locations with free parking and easy access to other amenities are most popular

Local government | Electric and gas utilities | Fuel producers, distributors, and wholesalers | Community member | Environmental justice / climate / clean transportation organization | Credit aggregators | Tribal representative | Public transit agencies and ports | Electric vehicle producers and charging infrastructure providers | Other - please identify

Allow individual public sector fleets (with private chargers) to qualify, aligning with CARB's formula of 50% credits compared to public and shared sites)

❤️ 9

Extend light- and medium-duty (LMD) FCI application deadline to December 31, 2030

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Reform the MW cap to provide ample opportunity for capacity crediting for infrastructure for segments with high-capacity charging needs, like shore power.

👍 5

Reduce the number of fleets needed to qualify for shared eHDV capacity credits from 3 separate fleets to only 2. This especially limits transit agencies and public fleets who may be neighbors, but are excluded from FCI due to not having a 3rd party to share EV chargers with.

👍 4

Perhaps waivers for participation fees for small producers of opt-in fuels (i.e., small municipalities) or pathways for automatic enrollment?

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^^ Comment- Capacity credits exist to alleviate large upfront costs for building infrastructure ahead of demand, which is exactly the challenge that private fleets face during scaling.

👍 3

like CARB allow individual public sector eHDV fleets to earn credits but at a lower rate than shared depots or truck stops

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Allow for larger site capacity limits (increase from 2.5MW) for LMD.

👍 6

Rather than tie capacity credits to CAPEX, instead simply allow groups to generate FCI credits for a 10 year period. The CAPEX reporting is a major administrative undertaking for both program participants, as well as ECY staff.

👍 5

Allowing access to capacity credits for public sector fleets' heavy-duty EVs would provide them the capability to build out needed infrastructure early (and all at once) and help reduce diesel emissions - especially in overburdened communities

👍 7

Freight corridors and hubs, including warehouses, are a major source of highly toxic diesel pollution for large number of communities. M/HD charging infrastructure needs to be given special attention. Utilities should design programs that incentivize commercial charging infrastructure.

👍 4

As the largest aggregator of FCI credits in the CA LCFS under the new methodology, we can attest that FCI utilization is likely to remain well below 20% for many years to come.

👍 3

I've also heard concern from folks in the transit sector about the availability of advance credits, so this is a topic I'd like to learn more about. Could increasing access to advance credits help smooth the market as you heighten the stringency, while supporting key projects and not relying on fuels with dubious climate benefits?

👍 2

Private eHDV charging (non-shared) should be eligible for capacity crediting, just at a lower cap than shared infrastructure, as the CA LCFS regulation allows.

👍 6

Eliminate avoided methane that only benefits certain polluters.

👍 2

4

4. Decarbonizing electricity generation

Background: The Clean Fuel Standard (CFS) depends on low-carbon and zero-carbon electricity to meet the state's greenhouse gas emissions reduction goals.

Questions:

1. How can the CFS best incentivize additional zero-emission electricity generation?
2. How can the CFS help in promoting the installation of residential solar power at homes for EV charging?

Local government | Electric and gas utilities | Fuel producers, distributors, and wholesalers | Community member | Environmental justice / climate / clean transportation organization | Credit aggregators | Tribal representative | Public transit agencies and ports | Electric vehicle producers and charging infrastructure providers | Other - please identify

Look closely at bio-fuels. Do benefits actually pencil out?

👍 2

All electric energy provided in Washington will be carbon neutral by 2030

👍 2

Additional electrification mandates should be aligned with demonstrated grid reliability, transmission capacity, and long-term affordability for consumers.

support and promote battery storage programs to prevent need for net metering, close looped systems.

CFS can't solve every thing. Many other tools in the toolbox to address this question.

👍 1

The issue is not only total electricity generation, but whether sufficient capacity exists during peak demand periods.

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5

5. Environmental justice considerations and additional benefits / considerations

Background: Ecology is interested in learning any additional benefits or considerations you can identify relating to transportation electrification.

Questions:

1. What other ideas would you like to share with us to support transportation electrification in the absence of federal support?
2. What transportation electrification advancement opportunities does the CFS have that would create the most public benefit?
3. How can CFS credits and incentives promote equitable access to electric modes of transportation?

Charging station / Parking lot

Any additional questions or comments you'd like to share.

Consider how CFS credits can work together with state-funded incentive programs to front-load investments in infrastructure and rebates in the next few years when they are most needed to keep electrification on track.

reducing cost of verification with virtual checks of paperwork rather than site visits and relying on W&M or utility rules for meter accuracy checks.

👍 5 ❤️ 1

Ensure the same level of rigor that you are applying to electricity (e.g., EER methodology) is being applied to all credited fuels. That is, use the latest science and most reliable data sources.

👍 2

ECY has an opportunity in this rulemaking to revisit how residential credits are allocated, following in the footsteps of New Mexico and their recently finalized regulation. These credits, and the value they represent under the CFS, are in large part a product of investments made by automakers in developing EVs that customers buy.

Crossover meeting with stakeholders for ZEV regulations, so they can understand the CFS and provide input on how to continue support in the absence of Washington being able to enforce regulations.

One of the most important things you can do to ensure the CFS supports electrification is implement guardrails against over-generation by biofuels. A glut of credits from renewable diesel and biomethane threatens to drive down the credit price, especially if the CIs for those fuels is too high to be supported by the latest science.

👍 4 ❤️ 2

The residential charging credit pool is a significant value stream under the CFS. With appropriate policy frameworks in place, the market can better leverage this value to advance WAs goals.

ECY should establish EV manufacturers, alongside utilities, as the joint priority credit generator for base credits from residential EV charging, and the priority credit generator for all incremental credits.

In exchange, EV manufacturers should directly reinvest credit proceeds to grow the EV market in WA. Rivian recommends that ECY establish a relatively flexible menu of eligible investment options, that could include some or all of the following:

- Annual dividend checks returned to customers.
- Rebates on home EVSE purchases.
- Public charging infrastructure deployment.
- Vehicle-grid integration (“VGI”) technology development and implementation.

The ommercial agility of OEMs enables them to respond quickly to new incentives and direct new revenue streams to fund market-growth activities, creating a powerful, high-impact investment engine.

Check out: On a scale of 1 (least) through 5 (most), how effective do you think the whiteboard activity was to provide Ecology feedback on transportation electrification topics?

1
Not at all effective

👎 1

2
Not very effective

👍 1

3
Somewhat effective

👍 8

4
Effective

👍 7

5
Very effective

👍 1