



June 12, 2018

Docket Nos. 4770 & 4780

-Via Electronic Mail-

Luly Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

RE: Comments of Greenlots in Support of Settlement Agreement

Dear Ms. Massaro,

Greenlots respectfully submits these comments to the Rhode Island Public Utilities Commission (the Commission) in support of the Settlement Agreement (the Settlement) dated June 5, 2018 in Docket No. 4770 "The Narragansett Electric Company d/b/a National Grid's Application to Change Electric and Gas Base Distribution Rates" and Docket No. 4780 "The Narragansett Electric Company d/b/a National Grid's Proposed Power Sector Transformation (PST) Vision and Implementation Plan".

Greenlots is a leading provider of grid-focused electric vehicle charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and is increasingly supporting programs in the workplace and residential Level 2 space. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic electric vehicle (EV) charging loads.

While Greenlots is not a party to these proceedings, we have been following the transportation electrification (TE) elements closely and have reviewed the various provisions of the Settlement, which addresses the Narragansett Electric Company d/b/a National Grid ("National Grid" or "Company") proposed Power Sector Transformation ("PST") Vision and Implementation Plan before the Commission. Greenlots believes that the Settlement is reasonable, in the public interest, and urges the Commission to approve the Settlement.

In particular, Greenlots believes that the Settlement represents a meaningful step forward in advancing Rhode Island's transportation electrification efforts, while more broadly advancing the state's clean energy and grid modernization goals. Additionally, Greenlots is intrigued by the new utility revenue models built around outcome-based performance incentive mechanisms.

In resolving contested issues, the Settlement represents a reasonable compromise between different interests, balancing needed investments with rate affordability, grid reliability, resiliency, customer choice, cost recovery, supporting greenhouse gas emissions reductions goals and the piloting of new technologies. Moreover, the Settlement supports and is consistent

with the policy and environmental goals of the state as detailed in the Rhode Island PST Phase One Report to the Governor.<sup>1</sup>

Greenlots is excited about the prospect of making progress on this important and wide range of issues and supporting these various goals. Transportation electrification is a nexus issue in accelerating and supporting these goals in addition to being a key goal itself. Greenlots looks forward to the implementation process for these transportation electrification programs with an eye towards the future and building upon their learnings and successes.

Greenlots believes in a deeper and more flexible role for the utility in advancing transportation electrification, but recognizes that the Settlement represents progress in accelerating the market for electric vehicles and electric vehicle charging products and services. Greenlots looks forward to serving in the PST Advisory Group and working with the Company to ensure that the open communications and smart charging/grid integration elements of the electric vehicle program are appropriately realized.

Greenlots requests that the Commission approve the Settlement Agreement. Greenlots appreciates all the work that the Commission, the Company, and the settling parties contributed to this process. We look forward to engagement in the Commission's continued efforts on these critical topics and thank it for consideration of these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley  
VP, Policy

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<sup>1</sup> [http://www.ripuc.org/utilityinfo/electric/PST%20Report\\_Nov\\_8.pdf](http://www.ripuc.org/utilityinfo/electric/PST%20Report_Nov_8.pdf)