



Plug In America
6380 Wilshire Blvd
Suite 1010
Los Angeles, CA 90048
(415) 323-3329

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

June 14, 2018

Re: Support for National Grid Power Sector Transformation Vision and Implementation Plan Settlement Agreement – Docket 4790

Dear Ms. Massaro:

Thank you for the opportunity to provide comments on the proposed settlement for National Grid's Power Sector Transformation Vision and Implementation Plan. Our comments are focused on the Electric Transportation component of the Clean Energy Programs (Article 2, Part C, Section 17.a).

Plug In America is the national consumer voice for plug-in electric vehicles (PEVs) and works to promote policies and programs nationwide that put more PEVs on the road.¹ Our members are passionate PEV advocates and have driven PEVs for many years, affording Plug in America a unique perspective on how consumers think about PEVs and what actually inspires a consumer to purchase a PEV.

The development of a PEV program by National Grid represents the very timely opportunity to expand the charging infrastructure for PEVs in Rhode Island. On behalf of the current and future PEV drivers in Rhode Island, we urge RIPUC to accept the proposed settlement agreement.

The PEV market is quickly growing. From January 2011 through February 2018, U.S. consumers have purchased approximately 750,000 electric vehicles,² with sales expected to accelerate as new vehicle makes and models become available. Rhode Island, like many other states across the country, has been preparing for the mass adoption of these clean vehicles due to the significant benefits these vehicles offer to the consumer, electric grid and each state.³

Therefore, due to the anticipated near-term rapid acceleration in PEV adoption amongst drivers in Rhode Island, we are pleased to offer our support for the proposed settlement and National Grid's Electric Transportation program.

¹ More information available at: www.pluginamerica.org

² Vehicle count based on <https://autoalliance.org/energy-environment/advanced-technology-vehicle-sales-dashboard/>.

³ See Plug In America Factsheet on the Benefits of PEVs: https://pluginamerica.org/wp-content/uploads/2016/11/Plug-In-America-Benefits-of-PEVs_161110v1.pdf



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The proposed plan includes five elements; Plug In America supports each of these. We have a few specific comments.

- (i) **Off-Peak Charging Rebate Pilot:** this is an appealing option. Plug In America does support EV-only time-of-use rates. Some drivers may not be ready to transition their whole homes to a time-of-use rate, but EVs are a relatively flexible load. However, if submetering is not allowed (using the meter embedded in the EV or EVSE), then the cost of an additional meter can make this option cost-prohibitive. A rebate for off-peak charging does not have the same regulatory constraints and has been used successfully by Con Ed in New York, among others.
- (ii) **Charging Station Demonstration Program:** the proposed ownership limits seem sound. The areas in which utilities can own systems seem reasonable. The proposed demonstration project seems rather small, especially in the number of Level 2 ports, so we hope to see more investment in this area in the future.
- (iii) **Discount Pilot for Direct Current Fast Charging (DCFC) Station Accounts:** demand charge relief for DCFC stations is important, especially as the market is growing and their utilization is relatively low. We support this action.
- (iv) **Fleet Advisory Services:** this program could be more useful with ambitious goals. We encourage National Grid to, in the future, develop a goal of a specific number of fleets transitioned to EVs, not just a specific number of studies performed.
- (v) **Electric Transportation Initiative Evaluation:** this is a necessary component, and the proposal looks sound.

Additionally, we note that the previously proposed transportation outreach and education funding is now part of a Strategic Electrification Marketing Fund. Education and outreach are very important tools for fostering the success of clean transportation in Rhode Island. We look forward to the PST Advisory Group's discussions on the use of this fund, and strongly encourage the PST Advisory Group to consider designating a significant portion for clean transportation education and outreach.

Furthermore, we encourage that consumer protection standards are adhered to in the deployment of the charging infrastructure, regardless if the charging infrastructure is owned by National Grid or third party companies. Key consumer protection issues include the following as listed below. These principles should be strictly adhered to:

- a) **Open Access** – This is defined as the ability to get a charge at any public charger - including L1, L2 and DCFC - either via a credit card swipe or mobile app to enable the charge. PEV drivers should never be stranded at a public charging location where they cannot actually charge.



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- b) **Transparency** – The price of a charge should be clear when the PEV driver connects to the charger. This price should also be reported in mapping API so that drivers can consider the price when selecting a charging station during a trip.
- c) **Interoperability** - This is a key principle for the entire charging infrastructure ecosystem. Currently, many companies have their own card or key, which means drivers must either join multiple “clubs” or risk being unable to charge.
- d) **Mapping data** - all electric vehicle service providers (EVSPs) should provide mapping data for charging locations, including costs for charging (both in and out of network), and operational status.
- e) **Signage** – There is a critical need for charging station signage, from highway visibility down to the last several hundred feet where the charging station is. While the charging station may be listed on a smartphone, car navigation, or web-based maps, the stations are still challenging to locate as the physical hardware is not that large. Directional signage installed on streets around the stations would help immensely, and also reduce consumer range anxiety. Signage also plays a key role in educating *potential* EV drivers about the existence of a charging infrastructure.

Please send any questions to Pete O’Connor, Policy Specialist, at poconnor@pluginaustralia.org.

Best regards,

A handwritten signature in black ink that reads "Pete O'Connor".

Pete O’Connor
Policy Specialist
Plug In America