



August 10, 2017

VIA ELECTRONIC MAIL

Rhode Island Public Utilities Commission
Division of Public Utilities and Carriers
Office of Energy Resources
DPUC.powertransformation@dpuc.ri.gov

RE: Notice of Inquiry and Request for Stakeholder Comment Regarding a Utility's Role in Deploying Beneficial Electrification with Focus on Plug-in Electric Vehicles; Reply Comments of the Sierra Club

The Sierra Club appreciates the opportunity to provide these reply comments on the beneficial electrification of Rhode Island's transportation and heating sectors with particular focus on the role of the utility in the adoption of electric vehicles (EVs) and the goals of an EV program. To the extent not covered by these reply comments, the Sierra Club reiterates the points made in the initial comments it submitted on June 30, 2017.

I. Utility Role in Supporting Electrification of Transportation

There was near-uniform agreement among the initial commenters that utilities have an important role to play in supporting electrification of transportation. As outlined in many of the initial comments, this role encompasses four primary areas: (1) investments in infrastructure needed to support installation of electric vehicle charging stations; (2) appropriate incentives for active and/or passive management of increased electric demand, including time-of-use rates; (3) public education regarding electric vehicle benefits and offerings; and (4) appropriate incentives for private purchase of charging stations and services (e.g., matching funds). Sierra Club supports utility engagement in each of these areas guided by the principles outlined below. In particular, utility engagement in advancing vehicle electrification should:

- (a) effectively use price signals and load management practices to maximize benefits to the system, electricity customers and EV drivers, including facilitating the integration of renewable resources;
- (b) provide equitable deployment of services, including commitments to disadvantaged communities;
- (c) foster a competitive market and the engagement of third party vendors of EV supply equipment and services in a manner that supports continued growth of the broader EV charging industry; and

- (d) increase access to EV charging beyond single-family homes with a focus on multi-family dwellings, workplaces, and public high-power “fast charge” locations, in order to improve EV adoption and awareness.

Many of the comments received were in line with these principles. In particular, several commenters highlighted the role for utilities in supporting the development of charging stations in circumstances where the competitive market may not deliver such services, particularly for multi-family dwellings and overburdened and underserved communities. The Sierra Club notes that similar challenges to private sector investment are present with direct current fast chargers as well.

II. Proposed Utility Program to Accelerate Electrification of Transportation

Moving forward, the Sierra Club urges the Public Utility Commission to require the state’s primary electric distribution utility, National Grid, to submit a proposal with the goal of meaningfully accelerating EV deployment in its service territory by increasing access to EV charging infrastructure. As detailed in Sierra Club’s initial comments, the proposal could follow the “make-ready” approach advanced by Eversource and National Grid in Massachusetts, direct utility ownership of charging stations, or some combination of the two. The proposal should be aimed at filling gaps in the competitive market’s provision of public EV charging infrastructure with particular focus on charging locations that will directly enable EV ownership (e.g., because these locations are regularly visited by an individual driver, such as a multi-unit dwelling or workplace).

The infrastructure proposal should be complemented by EV-appropriate time-of-use rates and/or load management strategies designed to mitigate impacts of the new and growing EV load. The proposal should also include an education component to inform customers about electric vehicle and EV charging infrastructure rebates and tax incentives and EV-specific and whole house rate structures that can benefit EV owners. And finally, the proposal should expressly address how transportation electrification benefits will be directed to overburdened and underserved communities.

In order to facilitate stakeholder and Commission review and enable improvements to the program moving forward the program should incorporate a robust data collection and reporting component. In particular, National Grid should collect data regarding EV driver adoption, use rate by site type and by charger type, price of kilowatt-hour (kWh) and use of kWh by price, charging load profiles (aggregate and by site type), load impacts, difference in site costs and performance, effects on electric vehicle ownership in proximity to its charging infrastructure, surveys of host satisfaction, surveys of residential customers about their perceptions of electric vehicles, and calculations of avoided emissions based on projected increases in EV adoption. The data collected should regularly be made public (subject to appropriate anonymization) to enable meaningful review and public input. A review process, potentially facilitated by an advisory group comprising key stakeholders, should be structured into the program to enable mid-course modifications to the program to enhance its effectiveness in achieving the goal of increasing EV adoption in the state.

III. Need to Complement Utility Programs with Direct Incentives for Electric Vehicle Purchase, Funded by a Price on Carbon in the Transportation Sector

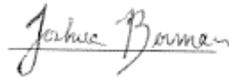
To accelerate EV adoption in Rhode Island, it will be necessary not only to address the shortage of public charging infrastructure, but also to provide financial incentives to reduce the up-front costs of purchasing electric vehicles. Presently, Rhode Island's electric vehicle rebate program has been halted due to a lack of available funds. See <http://www.drive.ri.gov/>. It is urgent that the state identifies an alternative source of funding. Many commenters observed that additional clean transportation funding could be raised by applying the approach and lessons learned from the Regional Greenhouse Gas Initiative in the power sector to the transportation sector. The Sierra Club strongly urges Rhode Island to move forward expeditiously with a strategy to price carbon from the transportation sector, in conjunction with other states in the region. Such a strategy will raise needed revenue to promote clean transportation options, including rebates for electric vehicles, while simultaneously curbing greenhouse gas and other harmful emissions from the transportation sector.

IV. Utility Role in Electrification of Home Heating

Finally, both the Sierra Club and Northeast Energy Efficiency Partnerships highlighted that beneficial electrification efforts should include heating in addition to transportation. As noted in the Sierra Club's initial comments, we encourage the Commission to require National Grid to develop a program to incentivize customers to install new efficient heat pumps for home heating. Incorporation of rebates for heat pumps and pricing carbon pollution from traditional heating fuels into the proposal will allow for the more significant emission declines needed to achieve Rhode Island's climate goals.

Thank you for your consideration.

Respectfully submitted,



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