



People's Power & Light Reply Comments Regarding a Utility's Role in Strategic Electrification with a Focus on Plug-In Vehicles

We appreciate the opportunity to reply to comments made by several stakeholders. We find ourselves in general agreement with most of the comments and believe that it may be time for some technical sessions on some discreet topics. Our reply comments are very brief:

We strongly agree with comments from Sierra Club and Acadia Center regarding consideration of the "Make Ready" model for building EV charging infrastructure and the importance of dynamic pricing to encourage off-peak charging.

Newport Solar made a good point about the importance of customer incentives for EVs. It is not helpful that rebate funding has lapsed. We strongly encourage the Raimondo administration to secure a stream of funding for EV rebates that would support a significant increase in the number of EVs purchased or lease in Rhode Island over the next three or more years. Having said that, the difficulty in securing rebate funding greatly increases the importance of offering consumers lower rates for charging vehicles off-peak.

We would have liked to see more from National Grid on the issues of dynamic pricing and off-peak charging because we feel that resolution of those issues are essential to meeting the state's ZEV goals for 2025. Again, perhaps we can discuss in further detail at a technical session or formal proceeding. But the longer we delay in putting forward and implementing a plan, the lower our chances are of reaching the 2025 target and capturing all of its associated benefits.

Sincerely,

Larry Chretien, Executive Director

larry@massenergy.org

Kat Burnham, Energy Programs Manager

kat@ripower.org.