



To: The Rhode Island Power Sector Transformation Team  
From: Larry Chretien, People's Power & Light  
Date: October 25, 2017  
Re: Comments on Draft Recommendations for Stakeholders

People's Power & Light (PP&L) is a nonprofit organization with a mission to harness the collective power of consumers to speed the transition to a low-carbon economy. PP&L appreciates the work that has gone on with all four work streams of the Power Sector Transformation process. We plan to intervene in the upcoming National Grid rate case but for now we have these comments regarding the Team's draft recommendations for Beneficial Electrification.

Overall, we are concerned that the Team has not provided National Grid and other stakeholders a clearer, more detailed sense of what the Team would want to see in terms of proposals intended to increase the adoption of electric vehicles.

Before getting into the weeds on the draft recommendations, I would like to make a point on process. In Massachusetts, our organization is an intervenor in EV charging infrastructure dockets initiated by both Eversource and National Grid. In the case of Eversource, the EV infrastructure piece is a relatively small part of a much larger rate case. Along with the Attorney General's office and many other stakeholders, we called upon the DPU to bifurcate the EV piece and to consider it on its own merits. The DPU did not heed our advice and we believe that was a big mistake given the contentious nature of that rate case. With that in mind, we urge the Team to call upon National Grid to propose an EV docket separate from the rate case they will be bringing forth in November.

I will go one step further. We suggest that, before National Grid submits an EV-related docket in Rhode Island, the PUC hold a technical session on EVs with stakeholders and that the



session begin with a discussion about National Grid's proposal in Massachusetts. The docket in Massachusetts has almost run its course and there is a large amount of good information on the record. By taking some time to hold a technical session, I believe we can identify key issues and come to a better consensus in less overall time.

Now regarding specifics in the Draft Recommendations:

Page 2: I would drop reference to light-duty transportation. EVs are cars, buses, trucks, and ferries.

Page 4: You have cited Rhode Island's EV deployment goals. In our view, the PUC needs to make decisions commensurate to those goals in the next twelve months to get Rhode Island on track.

Page 4: While there is an education role for utilities in the EV market, we would argue that other parties – car dealers, charge point companies, state and local government, and nonprofits (including PP&L) are better equipped for that role and that it's possible that utility efforts should be limited. Utilities should focus on what other parties cannot do.

Page 5: Again, I suggest we start by studying National Grid's proposal in Massachusetts, which is the "Make Ready" model.

Page 5: We encourage the Team to take the long-view and encourage proposals that will lead to market transformation in roughly the time frame of 2018-2025. There may be ideas that make little sense if accounted for in just the first year, but make enormous sense if the state is serious about meeting its deployment goals for 2025 and 2035.

Page 5: While we recommend a technical session, PP&L will argue that there is no way to achieve the state's deployment goals without time-of-use rates for EVs. Furthermore, time-of-use rates are obviously necessary to maximize net benefits. As we stated in the Massachusetts docket, this is the most glaring deficiency of National Grid's proposal.

Rhode Island has struggled to secure funding for EV consumer rebates. Consumer rebates are important in the short-term as a bridge to other, more sustainable policies, such as the build-



out of public charging infrastructure and time-of-use rates. Consider this fact: Many states offer \$2,500 rebates for all-electric vehicles. Offering such rebates to another 40,000 consumers would cost Rhode Island another \$100 million. Now is the time to honestly acknowledge it will not be possible to obtain that kind of money. Furthermore, 40,000 cars need infrastructure and time-of-use rates to manage load.

Page 9: Regarding education and outreach, having “everyone’s contact details” is not justification for handing this responsibility over to the utility. PP&L does favor the specific idea of the utility educating consumers about the availability of charging infrastructure and time-of-use rates, assuming that both are put into play.

Page 10: It is a good idea to look for supplemental sources of funding for EVs. But we caution against developing plans contingent upon speculative sources and sources that are simply not big enough for the job. For example, the VW settlement funds are a welcome drop in the bucket. Also, the federal tax credit of \$7,500 is on the table right now. And the longer Rhode Island takes to develop EV policy, the less likely consumers will benefit from that very generous tax credit. Policies that could get 5,000 more Rhode Islanders into EVs sooner rather than later would bring \$37,500,000 into the state’s economy. And that would still leave us about 30,000 vehicles short of the ZEV goal.

Page 12: Regarding point #17, we should acknowledge that achieving the EV deployment goals is going to cause load-growth driven infrastructure upgrades. But with load management tools, we can ensure that the benefits exceed the costs. To reduce expenditures on petroleum, we need to invest in EVs and infrastructure.

Thank you very much for your attention. PP&L is available to assist in any way as the Team proceeds to work on Beneficial Electrification and the other important aspects of Power Sector Transformation.