GREEN ENERGY CONSUMERS ALLIANCE

Memorandum

Date: August 13, 2021
To: Governor Daniel McKee, Joseph Polisena Jr., Victoria Scott, Commissioner Nicholas Ucci, Carrie Gill, Christopher Kearns
CC: Representative Joseph M. McNamara, Senator Frank Lombardo, III

Re: Recommendations for Rhode Island's EV Charging Plan

We at Green Energy Consumers Alliance are excited to see the Department of Transportation (DOT), the Division of Motor Vehicles, and the Office of Energy Resources (OER) tasked with developing a plan for EV charging infrastructure due to the enactment of H5031/S0994. We respectfully offer the following recommendations to develop a charging plan that will help to meet the 2030 Act On Climate mandate, based on our experience operating an electric vehicle buyer's program in Rhode Island since 2016 and participating in the development and review of similar plans in Massachusetts.

In our view, the statewide plan for charging infrastructure should include:

- An actionable, short-term plan to assess EV charging needs for the next 5 years (2022 – 2027). The plan should be sufficient to reduce transportation emissions in line with An Act on Climate.
- A clear target for necessary charging infrastructure by segment (Level 2 and DCFC, workplace, public, and residential) with a focus on supporting coordination among municipalities.
- Recommendations for how to best leverage federal dollars for charging infrastructure.
- Recommendations for how the utility company can support the deployment of charging programs that benefit both EV drivers and rate payers.
- A stakeholder process that consults with other government entities, including the Public Utilities Commission, RIPTA, and others, as well as non-government stakeholders, including charging vendors, businesses, environmental justice advocates, advocacy organizations, individuals, and others.
- An assessment of charging needs for medium- and heavy-duty vehicles.

The law dictates that the report be ready no later than January 1, 2022. Because this is not a lot of time, we encourage the responsible agencies to quickly assemble the resources and staff capacity to produce a comprehensive and practical study.

The plan should focus on the next five years to get Rhode Island on track to its ZEV goal and allow the state to adapt as technology changes.

As of June 2020, Rhode Island had roughly 3,000 EVs on the road[1]. In joining the Zero Emission Vehicle (ZEV) program established by California in 2013, the State set a goal of 43,000 EVs in the state by 2025. A five-year charging infrastructure plan can help Rhode Island meet this ambitious goal as soon as possible.

Focusing on the next five years would also be strategic because of the rapid pace of improvement for EV technology. Technology today is not a sound foundation to predict charging needs for the next thirty or even ten years, so a short-term plan will be more useful.

The plan should make charging recommendations based on location segment (residential, workplace, public).

We expect the plan to set an aggressive target for charging installation, working from a rule of thumb that recommends at least one publicly available charging port for every 5 – 10 EVs. This target should consider the exponential increase in EV sales expected in the coming years. The Department of Energy EVI Pro tool can be helpful tool to get a ballpark analysis of how many chargers are needed[2].

However, we find that charging infrastructure needs by town vary greatly and thus are highly speculative. For the purposes of planning, we urge the plan to focus its recommendations by segment (residential, workplace, public, and fast charging) rather than by municipality.

Because charging station availability is about creating a network that EV drivers may access at several different points, a prescriptive plan for the number of chargers needed in each town won't be as useful as a network-wide perspective. OER and DOT are in a unique position to help coordinate charging infrastructure across municipalities, so we hope the

[1] Report by Rhode Island Clean Transportation & Mobility Innovation Working Group, January 2021
[2] The Electric Vehicle Infrastructure Projection (EVI-Pro) tool was developed by the Department of Energy and has been used by Massachusetts and New York for their own charging plans. The publicly available "Lite" version of the tool is limited to assessing charging infrastructure for up to 10% EV market share.

plan includes strategies for coordination and planning within adjacent communities, especially to establish good coverage of DC fast charging stations for longer-distance travel.

The plan should identify funding sources and how to best leverage incoming federal resources to install EV charging, as the Biden Administration's Bipartisan Infrastructure bill includes $7.5 billion for EV charging stations. Rhode Island's participation in the Transportation & Climate Initiative program, which would provide an additional $20 million for clean transportation annually, could also help support charging infrastructure if there's a clear plan.

The plan should establish clear role and responsibility for utility companies.

National Grid has played a major role in the installation of EV infrastructure in Rhode Island through the programs established by the Power Sector Transformation filing in 2018. In just three years, the utility installed 275 charging ports across the state, according to documents the company has shared with stakeholders. National Grid also established SmartCharge Rhode Island, an incentive program that rewards EV drivers for charging during off-peak times, saving all ratepayers money and avoiding costly infrastructure upgrades to support EVs[3]. The state's plan to promote EV charging in Rhode Island should consider how utility programs can align with charging infrastructure deployment.

With the impending sale of National Grid to Pennsylvania-based utility PPL, we are concerned that utility support for Rhode Island's EV charging infrastructure may be at risk. We urge the plan written to establish a clear directive for the PUC to require National Grid, PPL, or any other investor-owned utility that serves Rhode Island to continue to offer EV charging programs that encourage EV adoption in a cost-effective way while delivering benefits to the overall system. We stand at the ready to help inform and guide this process.

The plan should not forget about medium- and heavy-duty vehicles.

In July 2020, Governor Gina Raimondo, along with sixteen other governors, signed an MOU to increase the sale of electric medium- and heavy-duty vehicles to 30% by 2030. Although the market is nascent, these vehicles will have unique charging needs that will require additional planning. We hope to see an assessment of what the charging challenges will be for this segment and how Rhode Island's charging plan can support achieving the goals in the medium-and-heavy duty MOU.

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[3] Studies by Synapse Energy Economics ("Electric Vehicles are Driving Electric Rates Down," Feb. 2019) and Applied Economics Clinic ("Comment on National Grid's response to information request CEP-1-2," Mar. 2019) show that off-peak EV charging reduces costs to all ratepayers and delivers benefits to the entire electric system.