



December 19, 2017

Brett Rude
Department of Ecology
Air Quality Program
PO Box 47600
Olympia, WA 98504-7600

Dear Brett,

RE: Proposed Volkswagen Beneficiary Mitigation Plan

Greenlots is pleased to submit these comments to assist Ecology in considering potential modifications to the Proposed Volkswagen Beneficiary Mitigation Plan.

Greenlots is a leading provider of grid-focused electric vehicle charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and works with a number of partners across the state. Greenlots' smart charging solutions are built around an open standards-based focus on future proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads.

To improve the efficacy of the Mitigation Plan, Greenlots suggests that:

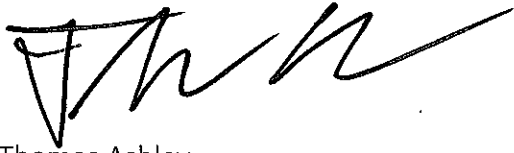
- A designee within the Governor's Office lead a stakeholder group comprised of representatives of the public and private sectors, including WSDOT, Ecology, Commerce, EV charging networks, transportation network companies, utilities, dealerships, automakers, non-profit environmental and consumer groups, mayors' offices, and other transit agency, private fleet, and government stakeholders
- An infrastructure strategy be created that assesses infrastructure needs in the region and aligns Mitigation Plan investment locations to best leverage all resources. This should include determination of where DCFC is needed and where AC charging is needed or sufficient. This strategy should also review and consider the reliability of existing infrastructure utilizing available data and consumer reviews.
- Deployed infrastructure be required to employ open communication guidelines, including Open Charge Point Protocol (OCPP) to ensure statewide connectivity and flexibility in network operations. Charging data should be made available to the state to assess network operations and the health of the deployed charging stations, as well as determine future infrastructure policy and deployment strategies.
- Fleet charging and fleet infrastructure that accompanies fleet electrification efforts should consider load management strategies to avoid unnecessary infrastructure upgrades, reduce demand charges, and be better able to react to evolving conditions on the grid, at the facility, and in fleet operations. Such strategies could include storage,

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managed charging, and grid-enabled charging. Fleet reporting could be utilized to exchange lessons learned and optimize future fleet electrification.

Greenlots looks forward to continuing to engage and support Ecology's on-going process. Please don't hesitate to reach out with questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'T Ashley', with a long horizontal flourish extending to the right.

Thomas Ashley
Vice President, Policy