

# City of Everett, WA

173-424-300 (vii) (B) states:

For nonresidential EV charging for on-road application, must provide the number of chargers located in Washington, their locations, the estimated annual discharge of electricity per location, the owner of the charging equipment, and the serial number assigned to the charging equipment by the original equipment manufacturer (OEM) and the name of the OEM. If there are multiple FSEs at the same location, each unique piece of equipment must be registered separately;

How is an agency or organization supposed to estimate their annual electrical charging kWh information if they currently use "dumb" chargers without meters to charge their vehicles? Obviously, there will have to be metering added either physically (with a meter install) or via some other means moving forward. But for forecasting for 2023, the data is simply not there. Recommend removing this requirement from the rule, and make it only if it is possible (if you have a meter or some other way to gather the estimated electrical use information, that agency or organization must provide it).

Also, that same section requires registration of each electric vehicle charger. If multiple electric vehicle chargers are on one metered line with one meter, then that one meter should be allowed to track the electric charging information for all chargers on that one electrical line.

See recommended wording below:

"For nonresidential EV charging for on-road application, must provide the number of chargers located in Washington, their locations, the estimated annual discharge of electricity per location (if available, if not available, explain), the owner of the charging equipment, and the serial number assigned to the charging equipment by the original equipment manufacturer (OEM) and the name of the OEM. If there are multiple FSEs at the same location, each unique piece of equipment must be registered separately (unless metered on one electrical meter, then the meter will be registered with a note stating what electric vehicle chargers by make, model, and serial number, are serviced by that meter);"