

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Tuesday, April 27, 2021 4:46 PM
To: 'lgoheen@steptoe.com'
Cc: Consumer Contact
Subject: FW: Notification of Unaccepted E-filing (E-filing ID = 26078)
Attachments: Comments to Florida PSC re Duke Petition_Docket No. 20210016-EI-c2.pdf

Good Afternoon, Ms. Goheen.

We will be placing the comments below in consumer correspondence in Docket No. 20210016, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

Toni Hover
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6467

From: Goheen, LeeAnn <lgoheen@steptoe.com>
Sent: Tuesday, April 27, 2021 4:37 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: David Fialkov (dfialkov@natso.com) <dfialkov@natso.com>
Subject: FW: Notification of Unaccepted E-filing (E-filing ID = 26078)

Good afternoon,

On behalf of the National Association of Truckstop Operators (NATSO), please find attached comments with regard to the petition for limited proceeding to approve 2021 settlement agreement, including general rate base increases, by Duke Energy Florida, LLC (Docket No. 20210016-EI). We respectfully request that you submit our comments to the Docket.

We mistakenly attempted to submit our comments through the e-filing website and appreciate you flagging for us that they should be submitted via email. Please let us know if we can provide anything else.

All the best,

LeeAnn Goheen

----- Forwarded message -----

From: Dorothy Menasco <DMenasco@psc.state.fl.us>
Date: Tue, Apr 27, 2021 at 4:26 PM
Subject: Notification of Unaccepted E-filing (E-filing ID = 26078)
To: dfialkov@natso.com <dfialkov@natso.com>

The document presented has been reviewed by the Office of Commission Clerk and has not been accepted as an e-filing. Comments should be submitted to clerk@psc.state.fl.us.

If you have any questions, please contact the Office of Commission Clerk at clerk@psc.state.fl.us

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David H. Fialkov
Vice President, Government Relations
Legislative and Regulatory Counsel
NATSO, Representing America's Travel Centers and Truckstops
dfialkov@natso.com
(703) 739 - 8501



April 27, 2021

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: *Petition for limited proceeding to approve 2021 settlement agreement, including general rate base increases, by Duke Energy Florida, LLC (Docket No. 20210016-EI)*

Dear Mr. Teitzman:

NATSO, the national trade association representing America's travel plazas and truckstops, appreciates the opportunity to provide comments to the Public Service Commission ("Commission") in Docket No. 20210016-EI, Duke Energy Florida, LLC ("DEF") Petition for Limited Proceeding to Approve 2021 Settlement Agreement, Including General Rate Base Increases. NATSO urges the Commission to deny DEF's petition.

NATSO is the premier trade association representing travel centers, truckstops, and off-highway fuel retailers. Our membership is comprised of both large, multi-billion dollar travel center and convenience store chains, as well as small, single-store operators. Almost every travel center location is in close proximity to an Interstate highway and includes multiple profit centers, from motor fuel sales and auto-repair and supply shops, to hotels, sit-down restaurants, quick-service restaurants, food courts, and convenience stores. Although the industry was once tailored solely to truck drivers, it now caters to the entire interstate traveling public, as well as the local population that lives in close proximity to a travel center location. NATSO's members' sole objective is to sell legal products, in a lawful way, to customers who want to buy them.

NATSO supports policies that incentivize fuel retailers to invest in alternative fuels and rewards businesses that make those investments. Should Florida desire a robust electric vehicle ("EV") charging marketplace (as the state has currently for liquid fuels), policies that encourage businesses to offer more alternatives and make those alternatives more economically attractive to consumers must be implemented. NATSO, therefore, strongly believes that the Commission should not permit DEF to utilize Florida's rate base to create – and then ultimately stall – the state's EV charging marketplace and certainly does not believe those decisions should be made behind closed doors.

Achieving market penetration of EVs will require a *partnership* between utilities and fuel retailers, with support from the Commission. If designed and implemented properly, such a partnership would benefit all players and ultimately achieve create a robust EV charging

marketplace. There are two components to this partnership: (1) power grid restructuring to accommodate the significant demands that an EV refueling network (and electrification of various other sectors such as home heating) will place on the grid as the world transitions away from fossil fuel; and (2) the consumer fueling experience to provide customers a safe, ubiquitous, reliable, affordable and competitive market for recharging activities.

The utility sector is best suited to perform the requisite generation development and power grid restructuring work. As such, NATSO supports a utility like DEF using the rate base to expand existing infrastructure to accommodate EV charging stations by restructuring the power grid. NATSO, however, strongly opposes forcing ratepayers to underwrite utilities' investment in EV charging stations or to subsidize the retail cost of electricity that charges electric vehicles. Where this occurs, the utilities are operating in a guaranteed rate of return environment without putting capital at risk. Retailers, like NATSO members, cannot compete with utilities in this environment. While there is good reason for ratepayers to help underwrite the cost of restructuring the power grid to accommodate EV charging, there is no public policy rationale as to why utilities should be given a leg up over private actors who wish to enter the market for chargers that consumers use to power their vehicles. Utilities' pursuit of this uncompetitive arrangement as DEF has requested from the Commission is the single greatest deterrent today to fuel retailers' investing in EV charging infrastructure. It also results in an extraordinarily regressive transfer of wealth from all ratepayers (regardless of income) to utilities and EV drivers.

What's more, as customers utilize EV charging stations, they will expect a seamless and predictable experience not unlike their current refueling experience; one that is grounded in safe, accessible amenities and affordable, competitive pricing. In essence, the current market dynamics that govern the liquid fuel retail sector should be replicated to facilitate a future where most consumers drive vehicles that run on electricity. Although we anticipate constant innovation and improvements, recharging an EV simply takes a lot longer than refueling a car with gasoline (20-40 minutes versus a two to three minutes to fill a gasoline tank). This underscores the need for safety, services, and other amenities at EV fueling locations. Utilities do not have the experience to offer this, but fuel retailers do. Failing to fulfill consumers' expectations with respect to their refueling experience will inevitably hinder their desire to shift to EVs.

NATSO urges the Commission to deny the DEF petition and instead requests a separate and unique docket to provide an avenue for utilities and fuel retailers the opportunity to partner to create a strong, long-term EV charging marketplace in Florida.

Sincerely,



David Fialkov

Vice President, Government Relations
Legislative and Regulatory Counsel
NATSO