

Jacob Veaughn

From: Jacob Veaughn on behalf of Records Clerk
Sent: Wednesday, April 28, 2021 8:50 AM
To: 'erigamonti@racetrac.com'
Cc: Consumer Contact
Subject: FW: Comments for Docket No. 20210016-EI (Resubmission in response to notification)
Attachments: RaceTrac_Comments for DEF FSPC Docket_042721.pdf

Good Morning, Eva Rigamonti

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

Jacob Veaughn

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Jacob.Veaughn@psc.state.fl.us
850.413.6656

From: Eva Rigamonti <erigamonti@racetrac.com>
Sent: Tuesday, April 27, 2021 6:08 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: Eva Rigamonti <erigamonti@racetrac.com>
Subject: Comments for Docket No. 20210016-EI (Resubmission in response to notification)

Good afternoon,

I received the below notification and am resubmitting the comments of RaceTrac Petroleum, Inc. for Docket No. 20210016-EI.

Thank you for your consideration,

Eva

Eva Rigamonti

Associate General Counsel | Executive Director of Public Policy
RaceTrac Petroleum, Inc. | erigamonti@racetrac.com
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From: Dorothy Menasco <DMenasco@PSC.STATE.FL.US> **On Behalf Of** Records Clerk
Sent: Tuesday, April 27, 2021 3:59 PM
To: Eva Rigamonti <erigamonti@racetrac.com>
Subject: Notification of Unaccepted E-filing (E-filing ID = 26072)

The document presented has been reviewed by the Office of Commission Clerk and has not been accepted as an e-filing per GCL/Weisenfeld. 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



BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

Petition for limited proceeding to approve)
2021 settlement agreement, including general rate base) Docket No. 20210016-EI
increases, by Duke Energy Florida, LLC) Filed: April 27, 2021

COMMENTS OF RACETRAC PETROLEUM, INC.

RaceTrac Petroleum, Inc. (“RaceTrac”) hereby submits 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. RaceTrac appreciates the opportunity to provide written comments.

RaceTrac employs more than 3,800 individuals and operates 286 convenience stores in Florida that have long provided fueling services in a competitive marketplace. As is evident in the liquid fuels marketplace, competition drives investment in emerging technologies, including renewable fuels, and benefits consumers in the form of better products and services at competitive prices. If Florida wishes to develop a robust electric vehicle (“EV”) charging marketplace, similar to what we see in the liquid fuels space, it must ensure there is a competitive environment for such investment.

Private sector investment and competition in the installation of EV charging infrastructure is **vital** to the long-term adoption of EV charging services. RaceTrac firmly believes that the Commission should not permit DEF to utilize the regulatory levers available in an opaque and closed Commission settlement and rate case to plan for Florida’s EV future.

When the Commission allows utilities to employ ratepayer funds to bankroll their investments in electric vehicle charging, utilities are exploiting the regulatory framework to occupy a superior market position in an otherwise competitive marketplace. Permitting utilities to own and operate charging infrastructure without putting a single capital investment at risk has a chilling effect on every segment of the marketplace. This un-level playing field discourages fuel retailers from investing in EV charging because they cannot compete with utilities in this

environment. The end result will be fewer electric vehicle charging stations for consumers as well as poorly distributed EV charging coverage for consumers at less than ideal locations and ultimately, fewer electric vehicles will be adopted.

RaceTrac's position is that rate cases are not the venue to address issues that will affect Florida's EV infrastructure public policy for decades to come. Utility investment, ownership, and operation in and of electric vehicle charging infrastructure should be dealt with in a single, open public comment docket available to all participants in the EV marketplace including, EV owners, equipment manufacturers and network operators, site hosts, and, of course, utilities. To exclude public comment and/or intervention, as is the case in the current DEF docket, in a critical rate case docket that will shape public charging infrastructure and EV adoption for the foreseeable future is inappropriate and potentially damaging to the whole EV sector and to the state of Florida.

Assuming that the convenience store model for EV charging becomes widely adopted, existing gas stations could be an essential part of any large-scale infrastructure deployment effort. Utilities, like DEF, tend to think it is necessary to own and operate EV charging stations to provide "sufficient coverage." Convenience stores are located at well-traveled intersections or other easy-to-reach sites for vehicle refueling, providing optimal locations for EV charging, and these businesses already have local name-brand recognition. Thus, the ownership and operation of EV charging infrastructure by utilities is unnecessary. Moreover, at RaceTrac all decisions are built on a foundation of consumer demand. We are closely aligned with our customers and quickly provide resources to meet those demands. Ensuring a level playing field for EV charging infrastructure investment will best serve consumer needs and ensure the development of a robust EV charging network in Florida.

What is needed is a conversation between electric utilities, infrastructure companies, and convenience store owners (site hosts) to lay the groundwork for the installation of EV chargers. A separate and unique docket open to all participants would provide an avenue for a robust conversation about the future of EVs and public charging infrastructure. RaceTrac believes the free-market ideas that we support will in the end prevail over a monopolistic view of the world. **RaceTrac urges the Commission to deny the DEF settlement case and open a free and fair public docket on EV charging infrastructure investment, ownership, and operation.**

Sincerely,

A handwritten signature in black ink that reads "Eva V. Rigamonti". The signature is fluid and cursive, with a prominent flourish at the end.

Eva V. Rigamonti
Associate General Counsel
Executive Director of Public Policy
RaceTrac Petroleum, Inc.