

Jacob Veaughn

From: Jacob Veaughn on behalf of Records Clerk
Sent: Friday, April 30, 2021 12:02 PM
To: 'George Cavros'
Cc: Consumer Contact
Subject: RE: Letter in support of DEF settlement agreement and electric vehicle provisions

Good Morning, George Cavros

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: George Cavros <george@cavros-law.com>
Sent: Friday, April 30, 2021 10:58 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Letter in support of DEF settlement agreement and electric vehicle provisions

Dear PSC Clerk,

Southern Alliance for Clean Energy provides the attached comment letter, to be filed in Docket No. 20210016, in support of the Duke Energy Florida settlement agreement, including the electric vehicle provisions.

Sincerely,

George Cavros

George Cavros, Esq.
120 E. Oakland Park Blvd., Suite 105
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954/295-5714

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April 30, 2021

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Re: Docket No. 20210016

Dear Chairman Clark and Commissioners Graham, Fay, and La Rosa:

Southern Alliance for Clean Energy (“SACE”) respectfully offers the following comments to help inform the Commission as it considers the Duke Energy Florida (“DEF”) 2021 settlement agreement in the above docket, specifically the electric vehicle charging infrastructure (“EVSE”) provisions.

SACE is a non-profit clean energy organization that promotes responsible and equitable energy choices that ensure clean, safe, and healthy communities throughout the Southeast. SACE advocates for a lower-cost, lower-risk clean energy future. Ramping up the electrification of transportation is a critical component of realizing that future.

SACE supports the 2021 Settlement Agreement, including the provisions designed to support electric vehicle (“EV”) adoption, because it is in the public interest.

The EV market needs a range of utility investment approaches to support EVSE deployment across a range of customer segments. DEF's program as proposed in the settlement agreement meets this need. **DEF's approach addresses a wide diversity of customer segments and includes different EV adoption-supporting approaches including residential off-peak charging incentive, rebates for EVSE installations, and utility owned and operated public fast chargers (“DCFC”).** All of these approaches are necessary to scale the nascent EV market.

SACE believes that utility owned and operated DCFC investments are critical. Current business models for owning and operating DCFC are challenging and slow to scale while the need for widespread DCFC deployment to support growing consumer EV adoption is urgent. Targeted utility DCFC ownership and operation is an essential and valuable part of DEF's program, especially when it comes to filling corridor charging gaps, providing access for underserved consumers in fiscally constrained counties and low-to-moderate income communities, and ensuring adequate DCFC deployment along evacuation routes. **DEF's program strikes a healthy balance by funding both rebates and utility ownership equally, and thus, not favoring one type of incentive over the other.**

SACE supports the growth of the entire EVSE industry and the variety of business models at play, including EVSE owner/operators, companies that sell EVSE hardware and software to end customers, including utilities, and companies that provide installation and maintenance services. Utility ownership and operation investments and rebate programs play complementary roles in accelerating EVSE deployment, spurring the EV market, and befitting the full range of EVSE business models. **And by increasing the demand side of the equation, utility investment incentivizes more EVSE suppliers, strengthening long-term market competitiveness to the benefit of consumers.**

SACE supports the EVSE provisions within the 2021 settlement agreement because utility investment in a suite of rate incentives, rebates, and owned and operated EVSE has demonstrated success in advancing EV adoption and increasing business opportunities for EVSE companies. We request that you approve the 2021 settlement agreement.

Respectfully Submitted,

/s/ Stan Cross

Stan Cross

Electric Transportation Policy Director

Southern Alliance for Clean Energy

stan@cleanenergy.org