

**Antonia Hover**

**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Friday, April 30, 2021 2:43 PM  
**To:** 'oscar@novacharge.net'  
**Cc:** Consumer Contact  
**Subject:** FW: Docket #: 20210016-EI  
**Attachments:** FL PSC\_Docket\_No\_20210016\_NovaCharge\_043021.pdf

Good Afternoon, Mr. Rodriguez.

We will be placing your 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

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**From:** Oscar Rodriguez <oscar@novacharge.net>  
**Sent:** Friday, April 30, 2021 2:13 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Docket #: 20210016-EI

Dear Sirs,

Attached is a letter from our company, NovaCHARGE, Inc., in support of Duke Energy Florida's petition for limited proceeding approved 2021 settlement agreement in the Proceeding before the Florida Public Service Commission (PSC) in Docket No. 20210016.

We look forward to answering any questions you may have during this process.

Respectfully,

**Oscar Rodriguez**  
CEO, NovaCHARGE, LLC

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April 30, 2021

Mr. Adam Teitzman  
Florida Public Service Commission  
Tallahassee, Florida

Dear Mr. Teitzman,

NovaCHARGE, Inc. is pleased to submit this letter in support of Duke Energy Florida's petition for limited proceeding approved 2021 settlement agreement in the Proceeding before the Florida Public Service Commission (PSC) in Docket No. 20210016. We believe that approval of the proposed 2021 Settlement Agreement aligns with state goal to provide for an expansive electric vehicle marketplace, while also creating new high technology supplier jobs in the state.

*About NovaCHARGE*

NovaCHARGE is a comprehensive solutions provider for EV charging infrastructure, founded in 2008 and with headquarters in Orlando, FL. NovaCHARGE is a Florida Based company, and a 100% Minority, Woman-Owned Business. We are a focused EV infrastructure technology company, service provider, and manufacturer of EV charging solutions, including NovaCharge branded Level-2 EV hardware and the *ChargeUP™* Administrative Cloud and EV driver service software. In conjunction with our EV infrastructure product solutions, NovaCHARGE delivers turnkey EV infrastructure deployment services, and we are committed to customer success by delivering uncompromising world-class design, project management, and EV infrastructure installation.

Over the past 12 years, we have acquired a distinct expertise in advising, designing, and deploying high-quality, curated EV charging systems for Workplace, Industrial, Commercial, Fleet, Residential, and Public charging customers, across the US and Puerto Rico. We specialize in providing the right solution that best fits our customer's charging needs, and in ensuring the highest levels of customer satisfaction. Our customers include a wide number of county and municipal governments and electric utilities in the state of Florida.

We were honored to have been selected as the prime contractor for the Duke Energy FL EV (DEFL EV2018) infrastructure deployment program that began in 2018 - FL State statute 339.287 SB7018. The NovaCHARGE team has been in charge of delivering complete turnkey EV infrastructure solutions for Duke Energy, across the State of Florida. The solutions we have deployed, on behalf of Duke Energy, include a wide variety of products from NovaCharge and select manufacturers of DCFC hardware.

### *Enabling new EV Charging Products Designed in Florida*

As a result of being selected as a key supplier to the DEFL EV2018 program, the NovaCharge team had the opportunity to expand our company, and thereby invest in the design and development of new software and hardware solutions. During this time, we were able to introduce new hardware products into the market and that we now offer to the general marketplace, including customers across the USA. As of today, over 1000 of these new units have been shipped to customers across the US and Puerto Rico. We also invested in new software development to deliver the next-generation ChargeUP cloud services. In contrast to many competitors in the EV charging infrastructure market, we are proud to say that all software at NovaCharge is designed by the company (no outsourcing to foreign staff in venues) and all development is based in Orlando FL, and cloud services are delivered from data centers, based in Tampa FL.

As a result of this added investment, we have been able to triple the staff of NovaCHARGE over the past 2 years. Despite the unfortunate impact of COVID-19 on our state economy, the Duke Energy FL program has allowed NovaCHARGE to expand its workforce beyond pre-COVID levels. and our business grew year-over-year. In speaking with our suppliers, they are very pleased to be able to create new jobs, many with average salaries above the median for FL workers.

### *Enabling a Wide and Diverse Supplier Eco-system in Florida*

The opportunity to deploy NovaCHARGE products in the DEFL EV2018 program has had a highly positive impact on NovaCHARGE and has also enabled a growing eco-system of Florida-based suppliers, who have each been a critical part of ensuring the expansion EV charging infrastructure in Duke Energy service territory in Florida. Below are just a few of the local suppliers who are part of the eco-system of Florida-based companies who are key suppliers to the Duke energy deployment, and the NovaCharge eco-system.

Several Florida-based Design Engineering companies that have been a key part of the NovaCharge new product design cycle, including:

Hi-Velocity, based in Tampa FL, provides continuous cloud infrastructure services for NovaCharge that enable highly secure cloud operations around the clock.

Creative Sign Designs, based in Tampa FL, manufactures aluminum pedestals that enable NovaCharge to meet critical wind ratings that ensure resiliency in stormy weather.

Design Launchers, an Orlando-based mechanical design company that is housed at the UCF Business Incubator in Research Park, provided critical design services for NovaCharge product designs.

PK Capital Ventures, a software consulting company in Orlando FL, provided critical software architectural design services for the ChargeUP cloud solution.

Speedpro of Orlando, providing high quality product labeling, designed to survive the heat and humidity of the Florida environment.

Several Florida-based licensed electrical contractors that have demonstrated the ability to deliver high-quality and cost-effective electrical design and installation services to enable EV Charging, as well as parking lot preparation companies, including:

Accurate Electrical Connection, based in Orlando FL – 16 employees involved in EV infrastructure services.

Sam's Electric, based in Tarpon Springs FL – 9 employees involved in EV infrastructure services.

Gemco Electric, Inc., a diverse supplier, based in Orlando FL - 8 employees involved in EV infrastructure services.

Windemuller Technical Services, based in Sarasota FL - 8 employees involved in EV infrastructure services.

D&C Parking Lot Maintenance, based in Orlando FL - 3 employees involved in EV infrastructure services.

Line Striping of Tampa Bay, based in St. Petersburg FL - 3 employees involved in EV infrastructure services.

The impact of the work done in the DEFL EV2018 by these companies has been transformational for those involved. We feel it's important to point out that by enabling local suppliers such as NovaCharge, who can in-turn leverage a wide eco-system of local suppliers to deliver critical parts and services, the DEFL EV2018 program has served to create high paying jobs across the state.

The diverse employees who work for these Florida-based companies are gaining lasting EV charging technical design skills and deployment experience that will serve to drive continuous employment to benefit their families. Most of these jobs require highly skilled staff, often with technical degrees and certifications, who typically earn compensation above the average pay for employees in the State of Florida. We expect that the use of local suppliers for EV infrastructure products and deployments will continue to add a positive impact to Florida's tax base over the years to come.

#### *The Need for More Investment to Drive Ubiquitous Electric Fueling Solving Range Anxiety in Remote Locations*

To anyone who owns an electric vehicle today, it's clear that more EV infrastructure is needed before wide adoption becomes a reality. While there are growing numbers of investments in many metro locations throughout FL, there is simply not enough to fuel the number of vehicles expected to hit the streets over the next few years. Moreover, without increased deployments in key inter-city transportation arteries and in rural communities, range anxiety will plague the ability for Floridians to comfortable travel from Key West to Pensacola, or Jacksonville to Naples. We feel that the only way to solve this is to enable early investments in EV infrastructure that drive market expansion of electric transportation.

In nearly every early technology market, private investment typically waits until the business models are clearly defined, and the expected ROI is deemed viable, before wholesale private investment begins. This is especially true for markets that require high capital investment and where pricing for the services delivered (in this case dispensing of power to vehicles) is still not well established. The ROI for a charging station in a remote location, with few charges per year, may not seem viable to a private investor unless the pricing is high enough to cover the

associated costs. If pricing is set too high, many of us would quickly see this as gouging. However, while it may be hard to justify the private investment of locating a station in such a location, I'm sure we all understand the need for the single mother with her children to never face the circumstance of being stuck on a lonely road with no battery left to continue their journey.

#### *Ensuring EV Fueling During Critical Evacuations*

Beyond the need to ensure EV fueling for daily rural electric driving, these remote places also need to support high-capacity EV fueling during natural disasters. Those of us who grew up in Florida, and have faced several hurricanes, are keenly aware that many of Florida's normally less traveled roads become critical components of our evacuation plans during natural disasters. During these times, traffic moves slowly and can exhaust the batteries of EVs as they slowly roll along, with the air conditioning running. In addition the distances between towns on these secondary roads can be long and the ability to recharge is key to a successful evacuation. Without strategically deployed high-capacity EV charging, an evacuation may become a true disaster as vehicles with exhausted batteries pile up on the side of the road, with no clear way to move them and with stranded families in greater danger as the forecasted natural disaster looms.

#### *Early Utility Investments Enable a Lasting & Positive Economic Impact*

Florida needs EV infrastructure that is eventually as densely deployed as the current Gasoline fueling infrastructure. It will take time to get there, but we must begin now – we simply can't wait for private investment to take up the task alone. We must encourage investment across the state to cover the needs of all citizens. The question then becomes, who will invest to deploy EV charging in these places, when the private markets may not? This is the dilemma we are now all facing and the challenge we must all solve together, during the early market days of EV transformation. The need for safety of citizens, in addition to the need to enable evacuation in times of natural disaster, demand that we solve this problem, today.

It is our belief that electric utilities have a key role to play in both the investment of EV infrastructure and in ensuring that the technology deployed work for the betterment of the public good. We believe that Florida-based utilities have clear roles to play that provide a true benefit to the citizens of Florida in deploying more EV infrastructure, for the following reasons:

- Given the real-world evidence of the positive economic impact to suppliers and the associated tax base, we strongly support the ability for utilities like Duke Energy to "seed the market" with the early investment required to deploy EV infrastructure in the State of Florida.
- With the clear need for ubiquitous infrastructure that is available, both in metro locations and in the remote places, to ensure the safety of citizens, both during daily use and during the peak times of evacuation for natural disasters, we strongly support the efforts of utilities like Duke Energy to invest for the betterment of Florida's transformation to safe and available electric transportation.

In summary, NovaCharge pleased to submit this letter in support of Duke Energy Florida's petition for limited proceeding approved 2021 settlement agreement in the Proceeding before the Florida Public Service Commission (PSC) in Docket No. 20210016.

Respectfully,

J. Oscar Rodriguez  
Chairman & CEO  
NovaCHARGE, Inc.