

**Brian Schultz**

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**From:** Brian Schultz on behalf of Records Clerk  
**Sent:** Wednesday, September 23, 2020 12:50 PM  
**To:** 'slinton@eei.org'  
**Cc:** Consumer Contact  
**Subject:** FW: Interested Person Request and Letter Submittal; Docket No. 20200170-EI  
**Attachments:** FINAL\_EEI FPL EV Pilot Petition Letter\_Sept 2020.pdf

Good Afternoon,

We will be placing your comments below in parties and interested persons correspondence in Docket No. 20200170-EI and forwarding your comments to the Office of Consumer Assistance and Outreach. Also per your request we have added Edison Electric Institute Attn: Shelby Linton-Keddie as to DKT 20200170-EI as an interested person.

Sincerely,

*Brian Schultz*

Commission Deputy Clerk II  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
850.413.6770

*PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are considered to be public records and will be made available to the public and the media upon request. Therefore, your e-mail message may be subject to public disclosure.*

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**From:** Linton-Keddie, Shelby <slinton@eei.org>  
**Sent:** Wednesday, September 23, 2020 11:01 AM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Interested Person Request and Letter Submittal; Docket No. 20200170-EI

Dear Commission Clerk,

Please add me on behalf of the Edison Electric Institute (EEI) as an interested person in Docket No. 202000170-EI. In addition, please also note that we are submitting a letter in support of FPL's Petition for Approval of Optional EV Public Charging Pilot Tariffs at this docket (attached).

My business address is below. Please don't hesitate to contact me directly if you need anything else in order to accept this letter to the docket.

Best,

Shelby Linton-Keddie

**Shelby A. Linton-Keddie**

Senior Director, State Energy & Regulatory Policy

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September 23, 2020

**VIA ELECTRONIC FILING**

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

**Re: Docket No. 20200170-EI; Florida Power & Light Company's Petition for Approval of Optional Electric Vehicle Public Charging Pilot Tariffs**

Dear Mr. Teitzman,

The Edison Electric Institute (EEI) respectfully submits this letter to the Florida Public Service Commission (Commission or PSC) in support of Florida Power & Light Company's (FPL) Petition for Approval of Optional Electric Vehicle Public Charging Pilot Tariffs (Petition) in the above-referenced docket. EEI has been monitoring electric vehicle (EV) proceedings across the country and appreciates the opportunity to provide the PSC with a national perspective on the integral role electric companies can play in supporting the deployment and growth of EV charging infrastructure and the market in general, while also describing some of the positive attributes of EVs that benefit all customers.

EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for 220 million Americans and operate in all 50 states and the District of Columbia. Collectively, the electric power industry supports more than 7 million jobs in communities across the United States. EEI's member companies, including FPL, deliver safe, reliable, affordable and increasingly clean electricity that power the economy and enhances the lives of all Americans. One of the ways electric companies meet this commitment is by proposing and offering well designed EV pilots that are able to gather data while also removing obstacles to EV charging infrastructure development.

Electric companies are well positioned to make targeted and strategic investments in EV charging infrastructure that benefit the broader community and accelerate EV adoption. As illustrated by recently enacted legislation, Senate Bill 7018, the Florida legislature understands the benefits expanded EVs have on climate,<sup>1</sup> encourages the installation and availability of reliable charging stations,<sup>2</sup> and supports electric utility participation in the marketplace.<sup>3</sup> As indicated in FPL's Petition, as of year-end 2019, Florida accounts for 4 percent of the U.S. market.<sup>4</sup> In addition, FPL

<sup>1</sup> See §339.287(1) (a)-(c), Fla. Stat. (2020).

<sup>2</sup> See *id.* at (d)-(f).

<sup>3</sup> See § 339.287(3).

<sup>4</sup> See FPL Petition at 6.

anticipates significant growth in the EV market going forward, with a projected 600,000 EVs on Florida's roads by 2030.<sup>5</sup> The Company's Petition proposes two pilot programs in order to reduce or eliminate barriers to this growth and gather valuable data regarding EV fast charging and infrastructure deployment.

The current lack of EV charging infrastructure is one the primary barriers to widespread EV adoption. EEI and the Institute for Electric Innovation (IEI) released a report in 2018 forecasting 18.7 million electric vehicles on the road by 2030.<sup>6</sup> To support that many EVs by 2030, 9.6 million charging ports will be needed.<sup>7</sup> This penetration is unlikely to be successfully achieved without significant utility investment.

It is also important to note that greater availability of infrastructure can also drive the adoption of EVs. Within two years of Evergy deploying its Clean Charge Network in the Kansas City Region, it had experienced a 95 percent increase in EV adoption across its service territories.<sup>8</sup> Market growth will not be linear and requires investments from automakers and electric companies alike.

To date, 48 electric companies in 26 states and the District of Columbia have received approval to invest more than **\$2.6 billion** in EV programs.<sup>9</sup> This includes two recent approvals in New York<sup>10</sup> and California<sup>11</sup> that together represent more than \$1.1 billion in investment. While this is an impressive number, more is needed. The type of EV program can vary by state and electric company, but usually includes at least one of the following elements: (1) investments in, or ownership of, charging infrastructure; (2) rebates and incentives to customers for charging infrastructure deployment; (3) customer education and outreach; and (4) EV-specific rates. Together, these programs can unlock value for all customers by growing the EV market for all participants, by helping to integrate EV charging into the energy grid in a cost-effective manner, and by driving outcomes that protect customer interests and maximize customer value.

Here, FPL proposes two pilot programs in order to gather data and begin to address current obstacles that exist in the near-term. The first allows FPL the ability to allow EV drivers to purchase charging services directly from FPL, and the second is an optional program, designed to limit demand charges for public Direct Current Fast Charge (DCFC) stations while load factors improve. Collectively, both programs are designed "to facilitate research and development related to public charging infrastructure"<sup>12</sup> and "to study a potential solution for mitigating the economic challenges that demand rates cause for public fast charge stations."<sup>13</sup> Neither goal can be

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<sup>5</sup> See *id.*

<sup>6</sup> See Appendix Edison Electric Institute and the Institute for Electric Innovation, Electric Vehicle Sales Forecast and the Charging Infrastructure Required Through 2030, November 2018, available at [https://www.edisonfoundation.net/-/media/Files/IEI/publications/IEI\\_EEI-EV-Forecast-Report\\_Nov2018.ashx](https://www.edisonfoundation.net/-/media/Files/IEI/publications/IEI_EEI-EV-Forecast-Report_Nov2018.ashx)

<sup>7</sup> *Id.*

<sup>8</sup> Clean Charge Network, "Five Years: A Timeline of EV Growth in Our Region," March 2020, <https://cleanchargenetwork.com/five-years/>

<sup>9</sup> See Edison Electric Institute, "Electric Transportation State Biannual Regulatory Update: June 2020," [https://www.eei.org/issuesandpolicy/electrictransportation/Documents/FINAL\\_ET%20Biannual%20State%20Regulatory%20Update\\_June%202020.pdf](https://www.eei.org/issuesandpolicy/electrictransportation/Documents/FINAL_ET%20Biannual%20State%20Regulatory%20Update_June%202020.pdf)

<sup>10</sup> See State of New York Public Service Commission, *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs*, Case 18-E-0138

<sup>11</sup> See Public Service Commission of the State of California, *Decision Authorizing Southern California Edison Company's Charge Ready 2 Infrastructure and Market Education Programs*, Application 18-06-015

<sup>12</sup> FPL Petition at 9

<sup>13</sup> *Id.* at 15.

realistically achieved without real world examples. Relying on hypotheticals and projections in perpetuity is not enough.

The availability of public DCFC is important to enable long-distance travel, provide charging solutions for drivers who do not have dedicated parking, and accommodate shared-use applications such as ride hailing, car sharing, and fleet charging. The proposed pilot programs allow FPL to address the charging needs of EV drivers in two complementary ways: directly providing access to the charging infrastructure needed to support the market (in this case, the associated tariff to do so), *and* providing rate design options that encourage more third-party development of charging infrastructure.

Third-parties developing DCFC infrastructure face a “chicken-and-egg” problem: widespread EV adoption is impeded by the lack of DCFC infrastructure, but the business case for DCFC infrastructure may be challenged by low utilization, which causes a low load factor, in the near-term. Today, electric companies like FPL and others are rethinking rate designs to recover costs appropriately, while encouraging third-party development of DCFC stations.<sup>14</sup> They are also implementing a variety of solutions to address this issue, including demand mitigation strategies.<sup>15</sup> Given the early stage of DCFC infrastructure development and deployment, experimentation and “learning by doing” like FPL proposes are important initiatives to encourage and support.

EEI is proud to support member companies, like FPL, that propose beneficial pilots designed to mitigate and remove obstacles to the growth and development of the EV market while, at the same time, creating opportunity to put downward pressure on rates for all customers. Giving FPL the ability to increase the availability of public DCFC stations, while collecting valuable data for EV fast charging and infrastructure deployment, meets the goals of Senate Bill No. 7018 and should be approved by the Commission.

Respectfully submitted,



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<sup>14</sup> For example, companies that offer rate options that place limits on demand-related charges include Duke Energy’s Rate DS, available in Kentucky, and Xcel Energy, who offers a cap mechanism that is available in Michigan, Minnesota, North Dakota and Wisconsin.

<sup>15</sup> Similar to FPL’s 5-year proposal, other companies are reducing demand charges temporarily with a phase-in period. Two examples of this include Southern California Edison’s three commercial rates (TOU-EV-7, 8 and 9), applying to different customer sizes, which do not assess demand charges for a five-year period, then phase in demand charges for a subsequent five-year period; and Pacific Power’s Schedule 45, which moves a portion of the demand charge to on-peak energy, and reduces the demand charge discount 10 percent each year until reverting to normal over a nine-year transitional period.