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June 9, 2025

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

**Re: Docket No. 20250011**

Dear Mr. Teitzman

Please find enclosed for filing in the above-referenced docket the Direct Testimony and Exhibits of Jigar J. Shah on behalf of Electrify America, LLC. This filing is being made via the Florida Public Service Commission's Web Based Electronic Filing portal.

Please contact the undersigned if you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Bright'.

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cc: All Parties of Record

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

Electronic Mail to the following parties of record this 9<sup>th</sup> day of June 2025:

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Senior Counsel  
Qualified Representative of Electrify  
America, LLC via ORDER NO. PSC-2025-  
0 107-FOF-OT (Issued April 3, 2025)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's	)	Docket No. 20250011-EI
Petition for a Base Rate Increase	)	Filed: April 1, 2025
	)	

**DIRECT TESTIMONY AND EXHIBITS OF**

**JIGAR J. SHAH**

**ON BEHALF OF**

**ELECTRIFY AMERICA, LLC**

**Filed: June 9, 2025**

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**DIRECT TESTIMONY  
OF  
JIGAR J. SHAH**

**I. INTRODUCTION AND QUALIFICATIONS OF JIGAR J. SHAH**

**Q. Please state your name, business address, and by whom you are employed.**

A. My name is Jigar J. Shah. My business address is 1950 Opportunity Way, Suite 1500, Reston, Virginia 20190. I am employed by Electrify America, LLC (“Electrify America”) as the Director of Energy Services.

**Q. On whose behalf are you testifying?**

A. I am testifying on behalf of Electrify America. To date, Electrify America has built a coast-to-coast network of Direct Current (“DC”) Fast Charging (“DCFC”) stations across over 1000 locations and with over 4,700 individual DC fast chargers in total, including 53 locations with 260 individual DC fast chargers in Florida. Within Florida Power & Light Company’s (“FPL” or “Company”) service territory, Electrify America currently operates 35 stations with 164 individual DC fast chargers. The chargers range from 150 kilowatts (“kW”) to 360 kW of power based on anticipated needs and use cases, as well as available real estate and power. The hyper-fast 360 kW chargers are among the most powerful public chargers on the market today, capable of recharging speeds close to gasoline fueling.

**Q. Have you previously testified before the Florida Public Service Commission (“Commission”)?**

A. No, I have not.

1

2 **Q. Please state your educational background and professional experience.**

3 A. As the Director of Energy Services, I am responsible for optimizing Electrify America's

4 energy portfolio. I have a Bachelor of Science degree in Electrical and Computer

5 Engineering, with a minor in Business, from Cornell University, and a Master of

6 Engineering degree in Electrical Engineering from Princeton University. Prior to my role

7 at Electrify America, I was a Principal Consultant at West Monroe Partners, advising

8 utility clients on smart grid modernization topics, rate structures, and energy storage.

9 Previously, I was a Senior Researcher at Envision Energy focused on wind farm (plant

10 level) controls and analytics, and an Edison Engineer at General Electric Global Research

11 focused on wind turbine control systems and distributed energy resource controls,

12 including for electric vehicle fleet charging to minimize demand charge costs. I have

13 journal publications and issued patents in the fields of electric vehicle charging, vehicle-

14 grid integration, and renewable energy.

15

16 **II. PURPOSE OF TESTIMONY**

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to provide Electrify America's recommendations

19 regarding the Company's proposed modifications to the ("GSD-IEV") and General

20 Service Large Demand ("GSLD-IEV") tariffs, as well as the Company's proposed

21 pricing in the Company's Utility-Owned Public Charging tariff ("UEV Tariff").

22

23 **Q. Are you sponsoring any exhibits with your testimony?**

1 A. Yes, attached are the following exhibits:

- 2 • Exhibit JJS-1, which includes the combined discovery responses relied upon in this
- 3 testimony;
- 4 • Exhibit JJS-2, a document demonstrating Electrify America’s calculations
- 5 supporting its recommendations in this proceeding, and
- 6 • Exhibit JJS-3, Florida Power & Light Company's 2024 Public Electric Vehicle (EV)
- 7 Optional Pilot Tariffs Report and EVolution Pilot Program Summary (“2024
- 8 Report”).<sup>1</sup>

9

10 **III. SUMMARY OF THE COMPANY’S PROPOSED MODIFICATIONS TO THE**

11 **GSD-1EV AND GSLD-1EV TARIFFS AND ELECTRIFY AMERICA’S**

12 **RECOMMENDATIONS**

13 **Q. What does the Company propose regarding the GSD-1EV and GSLD-1EV tariffs?**

14 A. As stated by Company Witness Oliver, the GSD-1EV and GSLD-1EV tariffs are demand

15 limiter voluntary tariffs designed to support existing and new EV charging stations.<sup>2</sup>

16 These rates are designed to provide a lower initial electric rate to customers during the

17 critical early stages of operations.<sup>3</sup> The Company characterizes the GSD-1EV and

18 GSLD-1EV tariffs as a success, stating that as of December 31, 2024, only 42 customers

19 were enrolled in the GSD-1EV and GSLD-1EV tariffs, with 34 out of the 76 total

20 customers that took service under the tariffs since their introduction in 2021 transitioned

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<sup>1</sup> Docket No. 20200170; *Petition for approval of optional electric vehicle public charging pilot tariffs*, by Florida Power & Light Company, Florida Power & Light Company's 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and EVolution Pilot Program Summary at 7, FN 6 (filed January 30, 2025) (“2024 Report”).

<sup>2</sup> Direct Testimony of FPL Witness Tim Oliver at 35, lines 9-12.

<sup>3</sup> *Id.* at lines 12-15.



1 to regular rates.<sup>4</sup> Given the stated success of the GSD-1EV and GSLD-1EV tariffs, the  
2 Company proposes to make them permanent.<sup>5</sup>

3  
4 **Q. Does the Company explain what it means by the “success” of the GSD-1EV and**  
5 **GSLD-1EV tariffs?**

6 A. Yes. The Company states that success for the GSD-1EV and GSLD-1EV tariffs is  
7 indicated by the following factors: “[t]he transition of customers from pilot rates to  
8 standard rates upon achieving higher load factors and consistent utilization,” “[t]he  
9 financial sustainability of charging stations receiving the demand limiter benefits,” and  
10 “[t]he overall growth in EV charging infrastructure and usage within FPL’s service area,  
11 indicated by the increase in the number of fast charging stations and the total energy  
12 dispensed through these stations.”<sup>6</sup> With respect to customers transitioning to standard  
13 rates, the Company explains that in its annual review of the demand limiter tariffs,  
14 including the GSD-1EV and GSLD-1EV tariffs, it transitions customers with load factors  
15 greater than ten percent to regular rates.<sup>7</sup> The Company notes that it did not seek input  
16 from third-party DCFC providers in establishing this ten percent threshold as being the  
17 appropriate load factor limit at which it would transition customers to standard rates.<sup>8</sup>  
18 Based on the above factors, the Company proposes to make the existing GSD-1EV and  
19 GSLD-1EV tariffs permanent without modification, as it views doing so as “the best  
20 approach to continue supporting the growth of EV infrastructure and adoption.”<sup>9</sup>

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<sup>4</sup> *Id.* at lines 14-18.

<sup>5</sup> *Id.* at 37, lines 1-5.

<sup>6</sup> Exhibit JJS-1 at 5; Company response to EVgo 1-1(a).

<sup>7</sup> Exhibit JJS-1 at 2; Company response to SACE 1-1(a).

<sup>8</sup> Exhibit JJS-1 at 1; Company response to SACE 1-3(c).

<sup>9</sup> Exhibit JJS-1 at 3; Company response to EVgo 1-6(a) (Corrected).

1   **Q.    What is Electrify America’s position on the proposal to make the GSD-1EV and**  
2       **GSLD-1EV tariffs permanent?**

3    A.   Exhibit JJS-2 shows a monthly utility bill calculation for two scenarios based on the  
4       Company’s 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and  
5       EVOlution Pilot Program Summary.<sup>10</sup> Utilizing the 2024 energy dispensed per site from  
6       the Company’s owned-and-operated fast charging stations<sup>11</sup> and assuming an average of  
7       four DCFC ports per site with an average demand of 100 kW/port for GSD-1EV and an  
8       average of 150 kW/port for GSLD-1EV, Electrify America estimates a representative  
9       monthly utility bill increase of seventeen to nineteen percent. This assumes that all  
10      energy delivered and billed in these scenarios, which does not account for operational  
11      needs and losses for DCFC sites. Such an increase in utility costs is substantial, and  
12      equates to an increase of roughly \$0.04 to \$0.06 per kilowatt hour (“kWh”) for the two  
13      scenarios demonstrated. While Electrify America supports the GSD-1EV and GSLD-  
14      1EV tariffs supporting lower load factor stations, Electrify America encourages the  
15      Commission to reduce the proposed rate increases to the extent possible given the  
16      operating cost burden imposed by the proposed increases demonstrated by Electrify  
17      America’s analysis. Electrify America recommends that the Demand sections in both the  
18      GSD-1EV and GSLD-1EV tariffs be modified such that the hours per month used to  
19      calculate the billed demand be increased from 75 hours per month to 150 hours per  
20      month, as follows:

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<sup>10</sup> Exhibit JJS-2; *See also* 2024 Report at Attachment 1.

<sup>11</sup> 2024 Report at Attachment 1.

1 “The Demand is the kW to the nearest whole kW, as determined from the Company's  
2 metering equipment and systems, for the 30-minute period of Customer's greatest use  
3 during the month as adjusted for power factor. In no month shall the billed demand be  
4 greater than the value in kW determined by dividing the kWh sales for the billing month  
5 by ~~75~~ 150 hours per month.”<sup>12</sup>

6  
7 Such a modification would help offset the proposed increases while continuing to provide  
8 support to new stations in the Company’s service area that may often begin service with  
9 low load factors.

10  
11 **IV. SUMMARY OF THE COMPANY’S PROPOSED MODIFICATIONS TO THE**  
12 **UEV TARIFF AND ELECTRIFY AMERICA’S RECOMMENDATIONS**

13 **Q. What does the Company propose regarding the UEV tariff?**

14 A. The Company’s UEV Tariff allows FPL to collect fees from drivers charging at its  
15 company-owned public fast charging stations.<sup>13</sup> Under the current version of the UEV  
16 Tariff, customers currently pay \$0.30 per kWh, plus applicable taxes and fees, for electric  
17 vehicle (“EV”) charging at company-owned stations.<sup>14</sup> As stated by Company Witness  
18 Oliver, the variation in local utility taxes and fees results in an effective 2024 after-tax  
19 rate of \$0.33 per kWh to \$0.39 kWh, with the average cost being \$0.37 per kWh.<sup>15</sup>  
20 Witness Oliver outlines FPL’s proposal to make the UEV Tariff permanent, and to

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<sup>12</sup> See Florida Power & Light Company Electric Tariff, First Revised Sheet 8.106; First Revised Sheet 8.311.

<sup>13</sup> Direct Testimony of FPL Witness Tim Oliver at 34, lines 17-18.

<sup>14</sup> *Id.* at 34, lines 21-22.

<sup>15</sup> *Id.* at 35, lines 1-2.

1 increase the market-based charging fee from \$0.30 per kilowatt hour (“kWh”) to \$0.35  
2 per kWh.<sup>16</sup>

3  
4 **Q. Why does the Company propose to increase the charging fee at its company-owned**  
5 **charging stations?**

6 A. Witness Oliver states that its proposed \$0.35 per kWh, or “~\$0.43 per kWh effective  
7 rate” is “market-based and comparable to the EV pricing options offered by non-utility  
8 providers.”<sup>17</sup> According to Witness Oliver, this pricing aims to balance affordability for  
9 consumers with ensuring the financial viability of charging infrastructure investments,  
10 noting that the “market-based pricing” will allow for the recoverability of all costs and  
11 expenses over the life of the assets.<sup>18</sup>

12  
13 **Q. How many Company-owned charging stations does the Company currently**  
14 **operate?**

15 A. FPL has installed 321 public fast charging ports as of December 31, 2024.<sup>19</sup> The  
16 Company indicates that by the end of 2025 it expects to have a total of 585 public fast  
17 charging ports installed.<sup>20</sup>

18  
19 **Q. How does the Company define the term “market-based rate?”**

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<sup>16</sup> *Id.* at 36, lines 15-16.

<sup>17</sup> *Id.* at 36, lines 16-18.

<sup>18</sup> *Id.* at 34, 18-21.

<sup>19</sup> Exhibit JJS-1 at 6; Company response to EVgo 1-11.

<sup>20</sup> Exhibit JJS-1 at 7; Company response to EVgo 1-12.

1 A. As stated by the Company in response to discovery, it uses the term “market-based” to  
2 refer to pricing “set by referencing comparable rates in the marketplace rather than being  
3 solely determined by regulatory or internal factors.”<sup>21</sup> The Company states that it  
4 considered a range of pricing options offered by non-utility providers within Florida to  
5 ensure its pricing remains competitive, benchmarking its pricing against current market  
6 standards.<sup>22</sup> The Company states that the rates it charges at company-owned stations do  
7 not undercut others in the EV charging landscape, specifically referencing Tesla,  
8 Electrify America, and EVgo as its “competitors” in the public DCFC market.<sup>23</sup>  
9 Additionally, the Company notes that “third-party charging companies are not required to  
10 remit taxes that FPL must collect, so there is an effective \$0.04-\$0.07/kWh that must be  
11 added to FPL’s EV charging fees.”<sup>24</sup>

12  
13 **Q. Does the Company elaborate on taxes that it claims it is required to collect, but**  
14 **other third-party charging providers are not?**

15 A. In the Company’s 2024 Public Electric Vehicle Optional Pilot Tariffs Report and  
16 EVolution Program Summary (“2024 Report”), the Company states that non-utility EV  
17 charging providers are not required to remit taxes that FPL must collect clarifying that it  
18 is referring to “gross receipts tax, sales tax, local option tax, municipal utility tax and  
19 franchise fees were (sic) applicable.”<sup>25</sup>

20  

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<sup>21</sup> Exhibit JJS-1 at 8; Company response to EVgo 1-2(a).

<sup>22</sup> Exhibit JJS-1 at 8; Company response to EVgo 1-2(b).

<sup>23</sup> Exhibit JJS-1 at 10; Company response to SACE 1-5(c).

<sup>24</sup> Exhibit JJS-1 at 8-9; Company response to EVgo 1-2(c).

<sup>25</sup> Exhibit JJS-3; 2024 Report at 8, FN 6.

1 **Q. Is the claim that Electrify America is not required to apply taxes to station end-**  
2 **users for charging services accurate?**

3 A. No, it is not. Currently, Electrify America collects sales tax from end customers.  
4 Electrify America then pays those taxes to the appropriate collector of such taxes. Per  
5 modifications recently made to Rule 5J-28.007, Florida Administrative Code, the Florida  
6 Department of Agriculture and Consumer Services recently made clear that “[a]ll costs to  
7 the consumer, including taxes, must be included in the cost per unit of energy or total cost  
8 of the subscription-based service.”<sup>26</sup> This law applies to all charging providers, including  
9 FPL, Electrify America, and any other company providing such services.

10  
11 **Q. What is Electrify America’s position with respect to the Company’s proposal to**  
12 **make the UEV tariff permanent at what it characterizes as “market-based” pricing?**

13 A. Electrify America is strongly opposed to the Company’s proposal, as the Company’s  
14 argument that its proposed pricing of \$0.35 per kWh is “market-based” is flawed and  
15 misleading. As the Company points out, Electrify America advertises guest and pass  
16 member pricing of \$0.48 per kWh.<sup>27</sup> Electrify America likewise offers Pass+ Member  
17 pricing at \$0.36 per kWh, however, such pricing requires a user to pay a \$7 monthly  
18 fee.<sup>28</sup> The Company has otherwise stated in this proceeding that pricing its charging at  
19 the proposed rate of \$0.35 per kWh does not undercut Electrify America’s pricing.<sup>29</sup> By  
20 its own admission, this is inaccurate. FPL is proposing to offer pricing that is  
21 unequivocally lower than Electrify America’s, and, given the Company’s intended

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<sup>26</sup> F.A.C. 5J-28.007.

<sup>27</sup> Exhibit JJS-3; 2024 Report at 8.

<sup>28</sup> *Id.*

<sup>29</sup> Exhibit JJS-1 at 10; *See* Company response to SACE 1-5(c).

1 deployment of 585 DCFC ports by the end of 2025, the Commission's approval of such  
2 pricing would give FPL a significant competitive advantage within FPL's service  
3 territory.

4  
5 **Q. Can you expand on the competitive advantage that the Company's DCFC stations**  
6 **have over third-party DCFC charging providers such as Electrify America?**

7 A. Yes. As stated by the Company, it "does not take service under any tariff for its public  
8 fast charging stations," and therefore does not have to remit to a utility the costs of the  
9 energy that its stations use in the same manner that a third party DCFC provider does.<sup>30</sup>  
10 Furthermore, not every kWh billed to third parties such as Electrify America by the  
11 Company will result in a kWh sold to DCFC customers given the operational energy  
12 needs of DCFC stations, including lighting and AC to DC conversion losses. The  
13 Company need not pay for such losses in the same manner that a third party DCFC  
14 provider has to, as its company-owned stations do not take service under an FPL tariff.  
15 Even before considering its supposed "market-based" pricing, which undercuts the third-  
16 party charging providers in the state, FPL is at a distinct advantage as compared to third  
17 party charging providers in its service territory.

18  
19 **Q. Why is the Company's proposed UEV tariff pricing a concern for ratepayers?**

20 A. The Company's 2024 Report identifies the 2024 revenue requirements for the UEV  
21 tariff.<sup>31</sup> The Company indicates that its revenue requirement for the UEV tariff is

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<sup>30</sup> Exhibit JJS-1 at 4; Company response to EVgo 1-4.

<sup>31</sup> Exhibit JJS-3 at 14; 2024 Report at Attachment 1.

1       \$5,741,000, and that it collected \$3,354,000 in revenues for those charging at company-  
2       owned stations in 2024.<sup>32</sup> The Company's report demonstrates that it operated its  
3       company-owned stations installed through December 2024 at a loss of \$2,387,000. This  
4       is concerning for two reasons: the first is that, as explained above, the Company is  
5       seeking to give itself a distinct competitive advantage as compared to third-party  
6       charging providers within its service territory. The Company is seeking to provide such  
7       energy at a lower rate than that of companies such as Electrify America. The second  
8       concern is that this structure will eventually set up FPL as the main provider of DCFC  
9       services within its service territory to the detriment of its ratepayers. The Company is  
10      operating its company-owned stations at a significant loss currently, and it is seeking to  
11      expand its DCFC deployments. Using the 2024 Report as a reference for the Company's  
12      future deployments, doing so will require additional, significant ratepayer funding to both  
13      construct and operate future company-owned charging. The Commission should not  
14      approve the Company's proposal to make the UEV tariff permanent as currently  
15      proposed given the significant costs borne by its ratepayers.

16  
17   **Q.   How do the Company's proposed rate increases in the GSD-1EV and GSLD-1EV**  
18   **tariffs and the Company's proposed UEV Tariff pricing impact future non-utility**  
19   **DCFC investment in the Company's service territory?**

20   **A.**   Electrify America owns and operates stations that directly compete with the Company's  
21       for EV fast charging customers. If the Commission approves the Company's proposed  
22       rate increases in this proceeding, prices for end customers at the Company's public

---

<sup>32</sup> *Id.*



1 charging stations are likely to be lower than those at Electrify America's and as a result  
2 utilization at Electrify America's DCFC stations is likely to decrease. In this scenario,  
3 lower utilization could erode or entirely eliminate profit margins for third-party charging  
4 providers within FPL's service territory. Reduced profit margins frequently have an  
5 impact on investment decisions, which given the circumstances described above, will  
6 likely result in a reduction in further investment by third party public charging providers  
7 in FPL's service territory in equipment upgrades, new DCFC sites, and the installation of  
8 technology innovations. In addition, as part of its current business model Electrify  
9 America offers to install and maintain fast charging infrastructure on behalf of  
10 commercial partners, and has faced resistance when exploring potential commercial  
11 partnership opportunities in the Company's service territory because of the competitive  
12 pricing concerns posed by the UEV Tariff. In sum, the Commission's decisions in this  
13 proceeding will have a significant impact on the quality and availability of public  
14 charging services for EV drivers in the Company's service territory.

15  
16 **Q. What is Electrify America's ultimate recommendation in this proceeding regarding**  
17 **the UEV tariff?**

18 A. Electrify America recommends that the Commission thoroughly review the 2024 Report  
19 and specifically the revenue requirement needed to support a permanent UEV Tariff.  
20 Given the Company's advantage within its service territory, the Commission should not  
21 approve any pricing at FPL's company-owned stations lower than a value that recovers  
22 all its operating costs, a reasonable portion of its capital costs, and the total utility costs it  
23 would have incurred if subject to the commercial tariffs it imposes on competitors, as

1 applicable. Based on Exhibit JJS-2, which uses reported operating costs and energy  
2 dispensed by FPL's company-owned fast charging stations in 2024<sup>33</sup>, and assuming a  
3 scenario where all capital costs are excluded, the lowest UEV Tariff pricing the  
4 Commission should approve should be no lower than \$0.50/kWh, depending on the final  
5 rate increases adopted by the Commission. Doing so will ensure that the Company's  
6 stations compete on a level playing field with third-party charging providers, collect the  
7 revenues necessary to avoid a significant burden being placed on ratepayers for UEV-  
8 Tariff-related revenue requirement shortfalls, and will help support the legislature's goal  
9 of expanding access to public fast charging infrastructure.<sup>34</sup>

10  
11 **Q. Does this conclude your testimony?**

12 **A.** Yes, it does.

13  

---

<sup>33</sup> See Exhibit JJS-3 at 14; 2024 Report at Attachment 1.

<sup>34</sup> See Section 339.287, Florida Statutes.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's                     )  
Petition for a Base Rate Increase                            )  
  )

Docket No. 20250011-EI  
Filed: April 1, 2025

**VERIFICATION**

I, Jigar J. Shah, hereby state I am the Director of Energy Services for Electrify America, LLC, that I am authorized to and do make this verification; and that the facts set forth in my testimony and exhibits are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter.

Signature:

  
Jigar J. Shah

Address:       1950 Opportunity Way  
Suite 1500  
Reston, VA 20190

Dated: June 9, 2025

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**SACE's First Set of Interrogatories**  
**Interrogatory No. 3**  
**Page 1 of 1**

QUESTION:

Please refer to page 11 of FPL's 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and Evolution Pilot Program Summary, document no. 00576-2025, filed on January 30, 2025. Please describe the purpose and function of using a load factor limit to remove customers from participation in the voluntary demand limiter tariffs. Please also include:

- a. An explanation of why the load factor limit was set at 10%;
- b. How FPL has determined that a 10% load factor limit is the appropriate threshold to incentivize third party DCFC investment.
- c. Whether FPL has sought input from third party DCFC providers regarding the appropriate load factor limit from their perspective.

RESPONSE:

- a.-b. Please see Attachment No. 1. In addition, for an explanation of why the load factor limit was set at 10% and how the Company arrived at the formula and load factor threshold for the GSD-1EV and GSLD-1EV rates, refer to FPL's Petition for Approval of Optional Electric Vehicle Public Charging Pilot Tariffs (Petition) filed in Docket No. 20200170 on June 19, 2020 (Document No. 03204-2020, linked below) and Order No. PSC-2020-0512-TRF-EI granting approval of FPL's Petition in Docket No. 20200170 (also linked below).

<https://www.floridapsc.com/pscfiles/library/filings/2020/03204-2020/03204-2020.pdf>

<https://www.floridapsc.com/pscfiles/library/filings/2020/13675-2020/13675-2020.pdf>

- c. No, FPL has not sought input from third-party DCFC providers.

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**SACE's First Set of Interrogatories**  
**Interrogatory No. 1**  
**Page 1 of 1**

QUESTION:

Please refer to the direct testimony of Tim Oliver, page 35, lines 14 -18.

- a. Please describe the steps FPL has taken to determine why 42 of the total 76 customers that have enrolled in the voluntary demand limiter tariffs since 2021 have not successfully transitioned to regular rates.
- b. Please describe in detail FPL's findings resulting from any steps identified in response to interrogatory 1 a.

RESPONSE:

- a. FPL reviews the demand limiter tariffs through an annual process. This review looks at the billed demand, total demand limiter rate bills, and compares the bill to a standard GSD rate for all customers enrolled in the demand limiter rates over the past twelve months. This analysis identifies customers that are still benefiting from the tariff or not. If a customer is no longer deriving value from the demand limiter, they are transitioned to a standard rate. The remaining customers continue to benefit from the rate since their load factor remains below 10%.

As of March 2025, out of the 76 customers enrolled in the demand limiter tariffs since 2021, 40 have not yet transitioned to standard rates due to their load factor remaining under 10%. This indicates that these customers have not yet reached the utilization level that would make them eligible for a standard rate.

Please see FPL's response to EVgo's First Set of Interrogatories, No. 6 for the current count of customers enrolled since 2021 in the voluntary demand limiter tariffs and those customers that have transitioned from the demand limited tariffs to standard rates.

- b. In 2024, after the annual review was complete, 18 demand limiter customers were identified and successfully moved to standard rates, as a part of the ongoing evaluation and adjustment process to ensure optimal tariff alignment with customer usage patterns and the overall goals of the tariffs.

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**EVGO First Set of Interrogatories**  
**Interrogatory No. 6 Corrected**  
**Page 1 of 1**

**QUESTION:**

At page 37, Mr. Oliver states: “The company is also seeking approval to make permanent the GSD-1EV and GSLD-1EV demand limiter optional pilot tariffs as permanent tariffs.”

- a. Did the Company consider modifying its pilot tariffs? If so, please explain the options the Company considered for modifying its tariffs, and why the Company did not choose those options.
- b. Please provide the number of total charging stations enrolled in each of GSD-1EV and GSLD-1EV, by year, since pilot inception

**RESPONSE:**

- a. The Company did not consider modifying the GSD-1EV or GSLD-1EV pilot tariffs. The existing tariffs have proven effective in achieving the objectives of promoting EV adoption and supporting infrastructure investment. Initial feedback and the observed transition of 34 out of 76 customers (45%), since year-end 2024, from the pilot tariffs to regular rates demonstrate the success of the current structure. This number may change over time as more customers transition out of this rate. Therefore, the Company determined that retaining the existing tariffs without modifications was the best approach to continue supporting the growth of EV infrastructure and adoption.
- b. Since 2020, 76 locations have enrolled in the demand limiter rate, with 60 on the GSD-1EV and 16 on GSLD-1EV. As of March 2025, there are 40 locations currently enrolled in the program.

See corrected Table 1 below for the number of locations/accounts enrolled in each of GSD-1EV and GSLD-1EV, by year, since pilot inception:

**Table 1:**

End of Year	GSD-1EV	GSLD-1EV	Total
2021	45	1	46
2022	50	4	54
2023	50	10	60
2024	35	7	42
March 2025	33	7	40

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**EVGO's First Set of Interrogatories**  
**Interrogatory No. 4**  
**Page 1 of 1**

QUESTION:

Under what rate schedule(s) do FPL-owned public fast charging stations take service? Do FPL-owned public fast charging stations receive any discounts on their electric utility charges?

RESPONSE:

FPL does not take service under any tariff for its public fast charging stations. Instead, FPL's public charging stations are directly connected to FPL's grid. These stations do not receive discounts on their electric utility charges.

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**EVGO's First Set of Interrogatories**  
**Interrogatory No. 1**  
**Page 1 of 1**

QUESTION:

At page 21 of Ms. Cohen's testimony, she states: "Based on the success and experience of certain pilot programs, FPL is proposing to make the following programs permanent tariffs:", before listing six programs, including CEVCS-1, GSD-1EV and GSLD-1EV.

- a. How does FPL define "success" for each of the CEVCS-1, GSD- 1EV and GSLD-1EV pilot programs?
- b. Please provide any metrics the Company developed or reviewed to reach the conclusion that CEVCS-1, GSD-1EV and GSLD-1EV have experienced "success", as well as the supporting data or workpapers used to develop those metrics.

RESPONSE:

Success for CEVCS-1 is indicated by the interest and enrollment of commercial customers, the operational feasibility of the installed charging equipment, and positive feedback from the participants.

Success for the GSD-1EV and GSLD-1EV (General Service Demand and General Service Large Demand EV Charging Tariffs) tariffs is indicated by:

- The transition of customers from pilot rates to standard rates upon achieving higher load factors and consistent utilization.
- The financial sustainability of charging stations receiving the demand limiter benefits.
- The overall growth in EV charging infrastructure and usage within FPL's service area, indicated by the increase in the number of fast charging stations and the total energy dispensed through these stations.

FPL has developed and reviewed specific metrics to assess the success of CEVCS-1, GSD-1EV, and GSLD-1EV pilot programs. These metrics include:

Enrollment and Participation:

- 42 active customer accounts under GSD-1EV and GSLD-1EV as of December 31, 2024.
- One customer enrolled in CEVCS-1 by 2024, with installation in 2025.

Utilization and Transition to Standard Rates:

- 34 customers transitioned from pilot to standard rates as of December 31, 2024.
- Increased load factors for charging stations moved to standard rates.

Refer to FPL's response to EVGO's First Set of Interrogatories, No. 6 for additional information on GSD-1EV and GSLD-1EV pilot programs.



**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**EVGO's First Set of Interrogatories**  
**Interrogatory No. 11**  
**Page 1 of 1**

QUESTION:

As of the end of 2024, how many FPL-owned public fast charging ports has the Company built or installed?

RESPONSE:

As of the end of 2024, FPL has installed 321 public fast charging ports under its EVolution program. These ports are strategically located in various public spaces such as workplaces, tourist destinations, and along Florida's main highways, including Interstate 95, Florida's Turnpike, SR60, and SR70. This network aims to provide accessible and reliable charging options to support the growing adoption of electric vehicles in FPL's service area.

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**EVGO's First Set of Interrogatories**  
**Interrogatory No. 12**  
**Page 1 of 1**

QUESTION:

Assuming the Company's proposals in this proceeding are approved, please estimate the number of FPL-owned public fast charging ports the Company will have installed by the end of 2025, 2027 and 2030.

RESPONSE:

By the end of 2025, FPL expects to have installed a total of 585 public fast charging ports. This includes the 321 installed by the end of 2024 and additional ports planned for installation in 2025. This is the maximum number of ports planned at this time, so port count by the end of 2027 and 2030 will also be 585.

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**EVGO's First Set of Interrogatories**  
**Interrogatory No. 2**  
**Page 1 of 2**

QUESTION:

At page 36 of his testimony, Mr. Oliver states: "The Company is requesting to make the UEV Tariff permanent and increase the market- based charging fee from \$0.30 to \$0.35 per kWh. The Company asserts that the proposed \$0.35 per kWh (~\$0.43 per kWh effective rate) is market-based and comparable to the EV pricing options offered by non- utility providers."

- a. Please define the term "market-based", and explain whether the Company considered the national market, Florida market, FPL service territory market, and/or some other market in asserting that its proposed charging fee is "market-based."
- b. How did the Company determine that its proposed charging fee is "market-based"?
- c. Please identify and provide the "EV pricing options offered by non-utility providers" FPL references.
- d. Please provide all analyses, Studies, and other Documents supporting the Company's assertion that its proposed charging fee is "market-based."

RESPONSE:

- a. The term "market-based" refers to pricing that is set by referencing comparable rates in the marketplace rather than being solely determined by regulatory or internal factors. In asserting that its proposed charging fee is market-based, the Company considered a range of EV pricing options offered by non-utility providers within Florida to ensure the fee aligns with existing competitive pricing for similar services.
- b. The Company determined that its proposed charging fee is market-based by benchmarking it against the rates offered by non-utility EV charging providers. This involves analyzing the current rates within the competitive landscape, considering both the fixed and variable costs associated with EV charging services, and ensuring that the proposed rates are comparable and competitive. The proposed \$0.35 per kWh fee was set to reflect the market rates for EV charging services, balancing affordability for consumers while ensuring financial viability for the infrastructure investments.
- c. Refer to FPL's 2024 EV Annual Report for details of the EV charging providers used to determine market rates. Of important note, these third-party charging companies are not required to remit taxes that FPL must collect, so there is an effective \$0.04-\$0.07/kWh that must be added to FPL's EV charging fees.

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**EVGO's First Set of Interrogatories**  
**Interrogatory No. 2**  
**Page 2 of 2**

- d. Benchmarking against non-utility EV charging providers' rate structures ensures that the proposed rate of \$0.35 per kWh (~\$0.43 per kWh effective rate) aligns with current market standards. Further detailed analysis and supporting documentation can be found in FPL's 2024 EV Annual Report and related filings in Docket No. 20200170-EI. These documents demonstrate the basis for the proposed market-based rate.

**Florida Power & Light Company**  
**Docket No. 20250011-EI**  
**SACE's First Set of Interrogatories**  
**Interrogatory No. 5**  
**Page 1 of 1**

QUESTION:

Please refer to the direct testimony of Tim Oliver, page 36, lines 15 -21. Please explain in detail:

- a. FPL's basis for the company's determination that \$0.35/kWh is the appropriate rate to charge users of company-owned public fast charging stations under the UEV tariff.
- b. FPL's support for the statement at page 36, line 17, that the proposed rate is a "market rate."
- c. FPL's determination, if any, that, regarding the UEV tariff, the current rate or the proposed rate will or will not undercut other market participants.
- d. How, if at all, FPL considered the use of time-of-use pricing for users of company-owned public fast charging stations to encourage off-peak usage, and the findings of that consideration

RESPONSE:

- a. Please refer to FPL's Petition for Approval of Optional Electric Vehicle Public Charging Pilot Tariffs (Petition) filed in Docket No. 20200170-EI on June 19, 2020 (Document No. 03204-2020, approved in Order No. PSC-2020-0512-TRF-EI, for the basis of FPL's development of the UEV Tariff rate. Also see FPL's response to EVgo's First Set of Interrogatories, No. 2, subparts b. and d. Additionally, refer to FPL's 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and EVolution Pilot Program Summary ("Annual Report") filed on January 30, 2025, in Docket No. 20200170-EI (Document 00576-2025) for details and support for this rate.
- b. Please see FPL's response to EVgo's First Set of Interrogatories, No. 2.
- c. Based on FPL's understanding of current market dynamics and EV charging rates of market participants, FPL's UEV tariff pricing is set at \$0.30/kWh plus applicable taxes moving the average effective rate to \$0.37/kWh. This approach is market-aligned, ensuring the rates stay competitive without undercutting others in the EV charging landscape. Based on comparable rates from competitors like Tesla, Electrify America, and EVgo. FPL's proposed UEV tariff rate is consistent with current market EV charging rates and will allow for effective cost recovery over the life of the FPL EV charging assets.
- d. FPL did not consider TOU pricing for its public fast-chargers.

FPL UEV Pilot Tariff Energy Sales (kWh)	11,162,344
FPL Fast Charge Charging Ports as of December 31, 2024	321
FPL Evolution Fast Charging Sites as of December 31, 2024	76
FPL Average Ports / Site (Calculated, Rounded)	4
FPL Average kWh / Site / Month (Calculated)	12239
Total Operating Costs For January through December 2024	\$2,430,000
Total 2024 Operating Costs / kWh Dispensed for 2024 (Calculated)	\$0.22

**Scenario 1 - GSD-1EV with 100 kW/Port Demand for 4-Port Site**

Demand kW/Port	100
Demand kW	400
kWh for 30-day Month	12,239
Load Factor	4.25%
Demand Limiter Hours Per Month	75
EV Rider Limited Demand kW	163.19

June 2025 GSD-1EV Customer Charge	\$	30.41
June 2025 Total kWh Rate GSD-1EV	\$	0.0611
June 2025 Total kW Rate GSD-1EV	\$	13.41
June 2025 Energy Cost	\$	747.46
June 2025 Demand Cost	\$	2,188.41
June 2025 GSD-1EV Monthly Bill	\$	2,966.28
June 2025 GSD-1EV Effective \$/kWh	\$	0.24

Proposed 2025 GRC GSD-1EV Customer Charge	\$	38.36
Proposed 2025 GRC Total kWh Rate GSD-1EV	\$	0.0623
Proposed 2025 GRC Total kW Rate GSD-1EV	\$	16.53
Proposed 2025 GRC Energy Cost	\$	762.27
Proposed 2025 GRC Demand Cost	\$	2,697.57
Proposed 2025 GRC GSD-1EV Monthly Bill	\$	3,498.20
Proposed 2025 GRC GSD-1EV Effective \$/kWh	\$	0.29

<b>Total Monthly Bill Change</b>	<b>\$</b>	<b>531.92</b>	<b>17.93%</b>
<b>June 2025 GSD-1EV + 2024 Operating Costs per kWh</b>	<b>\$</b>	<b>0.46</b>	
<b>Proposed 2025 GRC GSD-1EV + 2024 Operating Costs per kWh</b>	<b>\$</b>	<b>0.50</b>	

**Scenario 2 - GSLD-1EV with 150 kW/Port Demand for 4-Port Site**

Demand kW/Port	150
Demand kW	600
kWh for 30-day Month	12,239
Load Factor	2.83%
Demand Limiter Hours Per Month	75
EV Rider Limited Demand kW	163.19

June 2025 GSLD-1EV Customer Charge	\$	89.26
June 2025 Total kWh Rate GSLD-1EV	\$	0.0548
June 2025 Total kW Rate GSLD-1EV	\$	15.74
June 2025 Energy Cost	\$	670.35
June 2025 Demand Cost	\$	2,568.64
June 2025 GSLD-1EV Monthly Bill	\$	3,328.26
June 2025 GSLD-1EV Effective \$/kWh	\$	0.27

Proposed 2025 GRC GSLD-1EV Customer Charge	\$	113.60
Proposed 2025 GRC Total kWh Rate GSLD-1EV	\$	0.0549
Proposed 2025 GRC Total kW Rate GSLD-1EV	\$	19.59
Proposed 2025 GRC Energy Cost	\$	672.19
Proposed 2025 GRC Demand Cost	\$	3,196.93
Proposed 2025 GRC GSLD-1EV Monthly Bill	\$	3,982.72
Proposed 2025 GRC GSLD-1EV Effective \$/kWh	\$	0.33

<b>Total Monthly Bill Change</b>	<b>\$</b>	<b>654.47</b>	<b>19.66%</b>
<b>June 2025 GSLD-1EV + 2024 Operating Costs per kWh</b>	<b>\$</b>	<b>0.49</b>	
<b>Proposed 2025 GRC GSLD-1EV + 2024 Operating Costs per kWh</b>	<b>\$</b>	<b>0.54</b>	

**Current Tariff Effective February 2025**

<https://www.fpl.com/content/dam/fplgp/us/en/rates/pdf/electric-tariff-section8.pdf>

GSD1EV			GSLD1EV		
	\$/kWh	\$kW		\$/kWh	\$kW
Fuel Billing Adjustment	\$0.02718		Fuel Billing Adjustment	\$0.02715	
Conservation Billing Adjustment		\$0.45	Conservation Billing Adjustment		\$0.51
Capacity Billing Adjustment		\$0.32	Capacity Billing Adjustment		\$0.35
Environmental Billing Adjustment	\$0.00295		Environmental Billing Adjustment	\$0.00269	
Storm Protection Billing Adjustment		\$1.42	Storm Protection Billing Adjustment		\$1.44
Transition Rider Credit		-\$0.24	Transition Rider Credit		-\$0.24
2025 Interim Storm Restoration Recovery	\$0.00545		2025 Interim Storm Restoration Recovery	\$0.00522	
Base Demand Charge		\$11.46	Base Demand Charge		\$13.68
Base Energy Charge	\$0.02549		Base Energy Charge	\$0.01971	
<b>Total</b>	<b>\$0.06107</b>	<b>\$13.41</b>	<b>Total</b>	<b>\$0.05477</b>	<b>\$15.74</b>

**Proposed Rates (pg 8 & 10)**

<https://www.floridapsc.com/pscfiles/library/t>

GSD1EV			GSLD1EV		
	\$/kWh	\$kW		\$/kWh	\$kW
Fuel Billing Adjustment	\$0.02718		Fuel Billing Adjustment	\$0.02715	
Conservation Billing Adjustment		\$0.45	Conservation Billing Adjustment		\$0.51
Capacity Billing Adjustment		\$0.32	Capacity Billing Adjustment		\$0.35
Environmental Billing Adjustment	\$0.00295		Environmental Billing Adjustment	\$0.00269	
Storm Protection Billing Adjustment		\$1.42	Storm Protection Billing Adjustment		\$1.44
Transition Rider Credit		-\$0.12	Transition Rider Credit		-\$0.12
2025 Interim Storm Restoration Recovery	\$0.00000		2025 Interim Storm Restoration Recovery	\$0.00000	
Base Demand Charge		\$14.46	Base Demand Charge		\$17.41
Base Energy Charge	\$0.03215		Base Energy Charge	\$0.02508	
<b>Total</b>	<b>\$0.06228</b>	<b>\$16.53</b>	<b>Total</b>	<b>\$0.05492</b>	<b>\$19.59</b>



**William P. Cox**  
**Senior Counsel**  
**Florida Power & Light Company**  
**700 Universe Boulevard**  
**Juno Beach, FL 33408-0420**  
**(561) 304-5662**  
**(561) 691-7135 (Facsimile)**  
**E-mail: will.p.cox@fpl.com**

January 30, 2025

**-VIA ELECTRONIC FILING-**

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

**RE: Docket No. 20200170-EI: Petition for approval of optional electric vehicle  
public charging pilot tariffs, by Florida Power & Light Company**

Dear Mr. Teitzman:

Please find attached Florida Power & Light Company's 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and EVolution Pilot Program Summary.

If there are any questions regarding this filing, please contact me at (561) 304-5662.

Sincerely,

s/ William P. Cox  
William P. Cox  
Fla. Bar No. 0093531

WPC:cw  
Attachment  
cc: Shaw Stiller, Senior Attorney (sstiller@psc.state.fl.us)





# 2024 Public Electric Vehicle (EV) Optional Pilot Tariffs Report and FPL EVolution® Pilot Summary

Jan. 30, 2025



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## I. BACKGROUND

Florida Power & Light Company (“FPL” or the “Company”) began implementation of FPL EVolution in 2019 with the goal of installing more than 1,000 public charging ports throughout the Company’s service area. The initial pilot primarily targeted deployment of Level 2 workplace and destination charging ports, as well as limited public fast charging, residential charging, and commercial and municipal fleet charging. The primary objective of this pilot was to gather data and learnings ahead of mass electric vehicle (“EV”) adoption.

In 2020, the Florida Legislature affirmed the importance of EVs and EV infrastructure to the future of the state, recognizing in Section 339.287, Florida Statutes, the need to “encourage the expansion of electric vehicle use” and establishing that “the prompt installation of adequate, reliable charging stations is in the public interest.” On June 19, 2020, FPL filed a petition, approved in Order No. PSC-2020-0512-TRF-EI (“Order 0512”), for two types of optional EV public charging pilot tariffs under its EVolution Program for the purpose of studying and supporting the development of EV public fast charging infrastructure in FPL’s service area. The tariffs are as follows:

- Utility-Owned Public Charging for Electric Vehicles (Rate Schedule UEV); and
- Electric Vehicle Charging Infrastructure Riders for General Service Demand and General Service Large Demand (Rate Schedules GSD-1EV and GSLD-1EV).

As part of FPL’s 2021 Settlement Agreement approved by the Commission in Order No. PSC-2021-0446-S-EI (“Order 0446”) issued December 2, 2021, FPL was authorized to expand its EVolution Program investment beyond the initial pilot, adopting a more comprehensive approach for EV charging. Order 0446 authorized investments over the settlement term (minimum of four years, 2022 through 2025) across several programs, including the following:

- **EVolution** – A pilot program that supports the growth of electric vehicles with the primary objective being to gather data and learnings ahead of mass EV adoption to better plan for and design possible future EV investments, focusing on infrastructure build-out impacts of EV adoption rates, rate structures and demand models, and grid impacts of fast charging.
- **Public Fast Charging Program** – A pilot program that expands access to public fast charging, including access in underserved areas and evacuation routes. The total investment in the Public Fast Charging Program is forecast to be approximately \$100 million over the four-year period 2022-2025. The expected revenues received under FPL’s UEV pilot tariff approved in Docket 20200170-EI, which established a rate for utility-owned public EV fast charging stations are expected to exceed revenue requirements over the useful life of the charging stations.
- **Residential EV Charging Services Pilot** – A voluntary tariff for residential customers who desire EV charging service, for a fixed rate, through the installation of a Level 2 EV charger that is owned, operated, and maintained by FPL. The subscription includes unlimited off-peak charging and flexibility to charge during on-peak periods, if needed, at the on-peak time of use (“TOU”) rate. FPL provides full installation and equipment-only installation options.
- **Commercial EV Charging Services Pilot** – A voluntary tariff for Commercial customers who desire EV charging services for fleet vehicles through the installation of FPL-owned, operated, and maintained EV supply equipment on a customer’s premise. Under the tariff,



the customer will pay a fixed monthly charge, established via a formula-based rate to allow for individual customer pricing designed to recover all costs and expenses over the life of the assets and be Cumulative Present Value Revenue Requirements (“CPVRR”) neutral to the general body of customers over the applicable term.

Pursuant to Order 0512 issued December 21, 2020, FPL provides this annual report on the status of the Company’s 5-year Optional EV Public Charging Pilot Tariffs, which became effective January 1, 2021. Further, Order 0446 required FPL to provide an annual report beginning in 2023 regarding Residential and Commercial EV Charging Services.

Ultimately, the Optional Electric Vehicle Infrastructure Riders and all pilot programs under FPL’s EVolution Program serve to enable electric vehicle charging across the state of Florida. Florida continues to rank second in the nation for EV adoption with an estimated 365,000 registered electric vehicles as of October 2024.<sup>1</sup> FPL estimates that there are 266,000 EVs in FPL’s service area as of July 2024, and FPL forecasts this amount to exceed 1.5 million by 2030.<sup>2</sup>

## II. FPL EVOLUTION

The FPL EVolution strategy is to ensure a comprehensive approach to EV charging to enable electrification across the Company’s service area. Enrollment in the initial pilot is now closed due to the exhaustion of the limited funding allocated for the program. In 2022, FPL began execution of the public fast charging, residential EV charging services and commercial EV charging services (“fleet”) pilot programs approved in Order 0446. The key objectives of each segment of FPL EVolution are to gather data and learnings ahead of mass EV adoption, advance future EV charging investments, enhance service, reduce costs, and enable electrification throughout the state.

FPL EVolution is leveraging an equipment agnostic network that is inclusive of private market electric vehicle charging infrastructure providers including but not limited to ChargePoint, Blink, Power Electronics, ABB, TECO Westinghouse, Wallbox, and others to unlock electrification for its customers, while ensuring a safe, reliable, and cost-effective network.

The following sections provide information about the various programs under FPL EVolution.

### A. FPL EVolution Public

FPL EVolution’s public charging programs began in 2019 with a pilot providing destination and workplace Level 2 charging and limited public fast charging. While enrollments in the Level 2 program have ended due to the conclusion of the EVolution pilot outlined above, the Public DC Fast Charging Program continues through the ongoing installation of fast chargers throughout the state. Insights on the Level 2 installations may be found in the tables and charts below. The EVolution public fast charging strategy goes beyond providing access in busy urban and highway locations, extending its reach into the untapped potential of rural areas and less traveled roads, creating a network with chargers placed within 25 miles of each other and increasing driver confidence that EVs can easily be repowered along their route. The deployments aim to increase the availability of public charging for EVs in Florida through

<sup>1</sup> IHS Markit sourced from Atlas EV Hub. Vehicles in Operation as of 10/2024. Includes Battery Electric Vehicles (BEV) and Plug-in Hybrid Vehicles (PHEV).

<sup>2</sup> FPL 2024 Ten-Year Site Plan. Response to Staff’s 1st DR No. 20

investments in infrastructure that will increase driver confidence and spark adoption in locations that are unlikely to be served by the competitive EV charging market – including low- and moderate-income and rural areas.<sup>3</sup>

#### Deployments

As of December 31, 2024, FPL EVolution Public has installed 910 Level 2 charging ports and 321 fast charging ports.

#### Sessions and Energy Dispensed

FPL EVolution Public has dispensed 34,434 MWh over 1,350,365 charging sessions since launching in 2019. Refer to Table 1 for energy (MWh) dispensed by segment and Table 2 for a breakdown of charging sessions by segment in 2024.

**Table 1: Energy (MWh) Dispensed by Segment as a % of Total**

Charger Type	Charger Segment	2024	% of 2024 Total
Level 2	Workplace & Destination	6,933	34%
Fast Charge	Public	13,644	66%
<b>Total</b>		<b>20,577</b>	<b>100%</b>

**Table 2: Charging Sessions by Segment**

Charger Type	Charger Segment	2024	% of 2024 Total
Level 2	Workplace & Destination	353,900	50%
Fast Charge	Public	353,415	50%
<b>Total</b>		<b>707,315</b>	<b>100%</b>

#### Session Length and Energy (kWh) Dispensed per Session

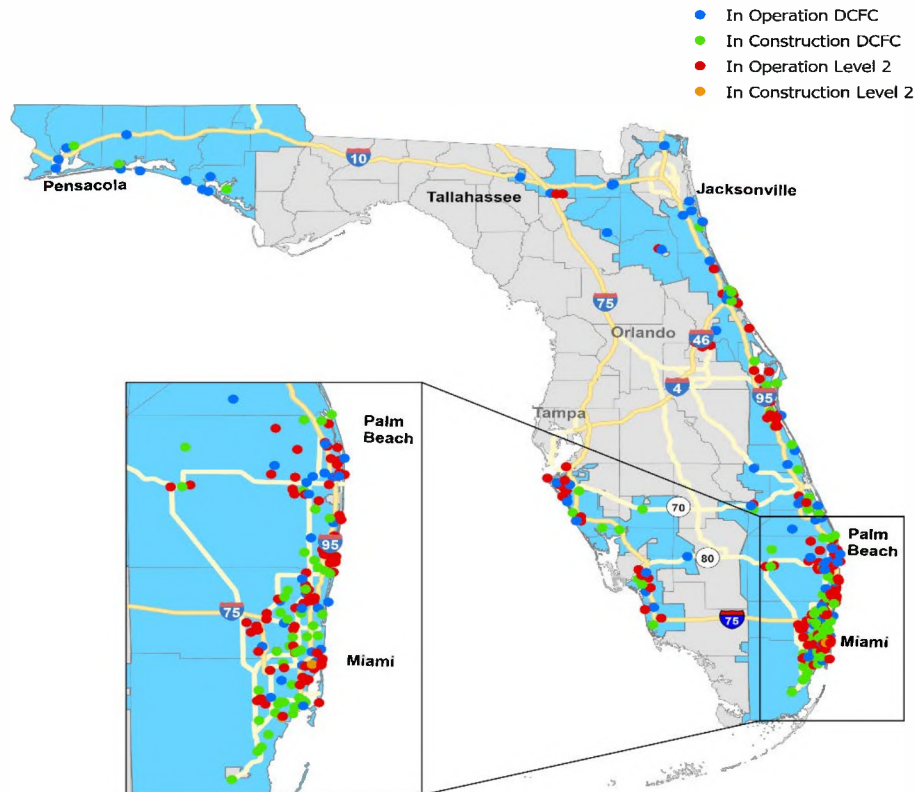
*Session Length:* Session length for Level 2 chargers averaged 1 hour and 48 minutes, and session length at DC fast chargers averaged 28 minutes in 2024.

*Energy (kWh) Dispensed per Session:* The average kWh per session at a Level 2 station was 19.5 kWh in 2024. The average kWh per session dispensed at a public fast charging station was 38.6 kWh in 2024.

Map of installed locations: Figure 1 shows the location of all FPL EVolution Public installations, including those taking service under the UEV tariff and GSD-1EV described in Section II of this report, as of December 31, 2024.

<sup>3</sup> The information provided for the FPL EVolution public fast charging stations includes those stations under the UEV tariff and 35 accounts under the GSD-1EV tariff.

**Figure 1: Map of FPL EVolution Public Locations as of Dec. 31, 2024**



i. Rate Schedule UEV

Rate Schedule UEV was developed to enable FPL to charge drivers for electricity at Company-owned stations. As of December 31, 2024, 76 FPL EVolution fast charging sites are operating under the UEV rate schedule.

Costs, Revenues, and Energy Sales

Attachment 1 provides specific information regarding capital and operating costs, revenue requirements, and revenues collected. As reflected on Attachment 1, the 2024 revenue requirement for the UEV program is \$5.7 million, which will be increasingly offset by higher utilization as the nascent market grows compared to the cost of installation and technology.

Updated Market Rates

Market rates from major public EV charging providers in Florida helped inform and establish guidance for UEV tariff development. As FPL indicated in Docket No. 20200170-EI, pricing structures vary by provider. In Florida, Tesla, Electrify America, and EVgo advertise pricing based on \$ per kWh.

- Tesla: Pricing varies by station within the state ranging from approximately \$0.24/kWh to \$0.50/kWh. Specific pricing by station is shared with Tesla drivers via the vehicle's onboard infotainment system and the Tesla app. Some stations charge users a flat \$/kWh rate while other stations charge TOU pricing. Idle fees of up to \$1.00 per minute may apply.<sup>4</sup>
- Electrify America: Advertises guest and pass member pricing of \$0.48/kWh. A Pass+ Member option is available at \$0.36/kWh plus a \$7 monthly fee. Station users are subject to idle fees of \$0.40 per minute after a 10-minute grace period.<sup>4</sup>
- EVgo: Advertises four per kWh pricing plans in Florida. Pricing is determined by the plan, location, and TOU with prices ranging from \$0.20/kWh to \$0.61/kWh. The "Pay as You Go" program provides charging rates from \$0.29-\$0.35/kWh with a \$3.00 pre-paid reservation fee and a session fee of \$0.99, with no subscription fee. The "EVgo Basic" program offers rates of \$0.27-\$0.32/kWh with a required monthly subscription fee of \$0.99. The "EVgo Plus" program has rates ranging from \$0.22-\$0.28 per minute and requires a monthly subscription payment of \$6.99. Lastly, the "EVgo PlusMax" has rates of \$0.20-\$0.26/kWh and requires a monthly subscription payment of \$12.99.<sup>4</sup>

Non-utility EV charging providers are not required to apply taxes to station end-users for charging services.<sup>5</sup> Accordingly, EV charging providers do not have tax applications for rendered services versus for the resale of electricity.

Under FPL's UEV tariff, participating customers pay \$0.30/kWh plus applicable taxes and fees.<sup>6</sup> Because local utility taxes and fees vary by location, the effective after-tax rate in 2024 under the UEV tariff ranged from \$0.33/kWh - \$0.39/kWh, averaging \$0.37/kWh.

#### Charging Times

Chart 1 illustrates total hourly load<sup>7</sup> for the 76 FPL EVolution fast charging locations that operated under the UEV tariff in 2024. Public fast charging utilization varies throughout the day, with the greatest utilization occurring between the hours of 9 am and 10 pm ET.

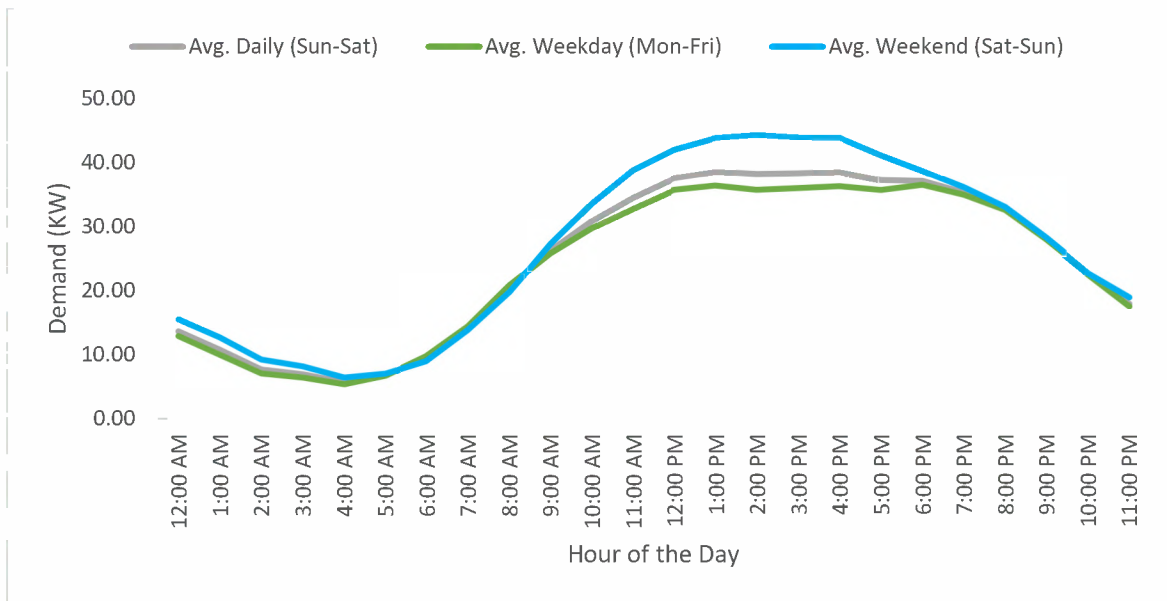
<sup>4</sup> Electrify America Fast Charging Pricing, Florida. <https://www.electrifyamerica.com/pricing/> Verified as of Jan 16, 2025. Tesla and EVgo pricing verified as of Jan. 16, 2025, using the Tesla app and the EVgo app.

<sup>5</sup> Florida Statute 366.94

<sup>6</sup> Includes gross receipts tax, sales tax, local option tax, municipal utility tax and franchise fees were applicable.

<sup>7</sup> Load Charts for UEV, RS-1EV, and GSD-1EV/GSLD-1EV include data from December 1, 2023 through November 30, 2024.

**Chart 1: UEV Average Load Shape**



## B. FPL EVolution Residential

Enrollments in the Residential Electric Vehicle Services Rider Pilot (RS-1EV) began in July 2022. As of December 31, 2024, 9,007 Level-2 chargers in single family homes are operational and the corresponding customers are being billed under RS-1EV. The average cost per port was \$1,700<sup>8</sup> in 2024.

### Costs, Revenues, and Energy Sales

Attachment 2 provides specific information regarding capital and operating costs, revenue requirements, and revenues collected. As reflected on Attachment 2, the 2024 revenue requirement for the FPL EVolution Residential program is \$6.0 million.

### Sessions and Energy (kWh) by Month

Table 3 includes information on monthly total charging sessions and energy (kWh), and Charts 2 and 3 illustrate monthly average 24-hour load shapes.<sup>7</sup>

**Table 3: FPL EVolution RS-1EV Sessions and Billed Energy by Month**

Category	Jan	Feb <sup>9</sup>	Mar	Apr	May	June	July
<b>Sessions</b>	76,792	83,529	94,661	99,869	114,726	110,078	115,182
<b>Energy On-Peak (kWh)</b>	34,986	9,698	44,304	48,100	52,369	49,235	44,121
<b>Energy Off-Peak (kWh)</b>	1,585,186	1,880,318	1,952,602	2,359,656	2,749,297	2,795,034	2,885,468

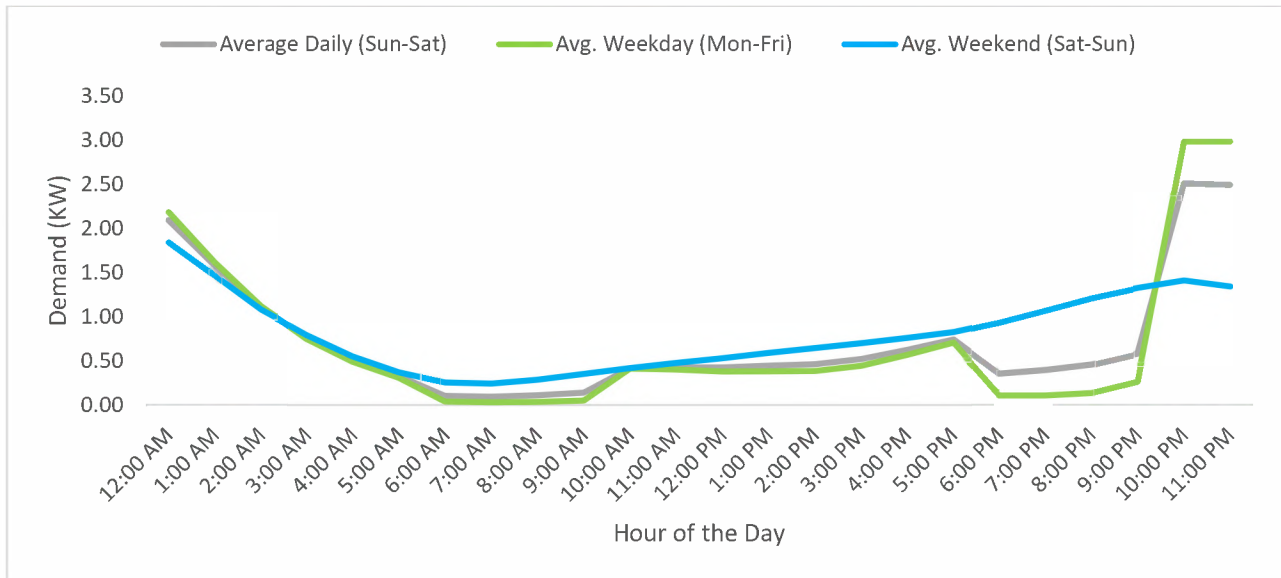
<sup>8</sup> \$1,700 cost per port is an average across all electrical installers and a 60/40 split between full and equipment only installations.

<sup>9</sup> Due to a server and connectivity issue for the billing of on-peak kWh usage, adjustments were made on-peak kWh usage and billing for EV Home customers in Feb 2024.

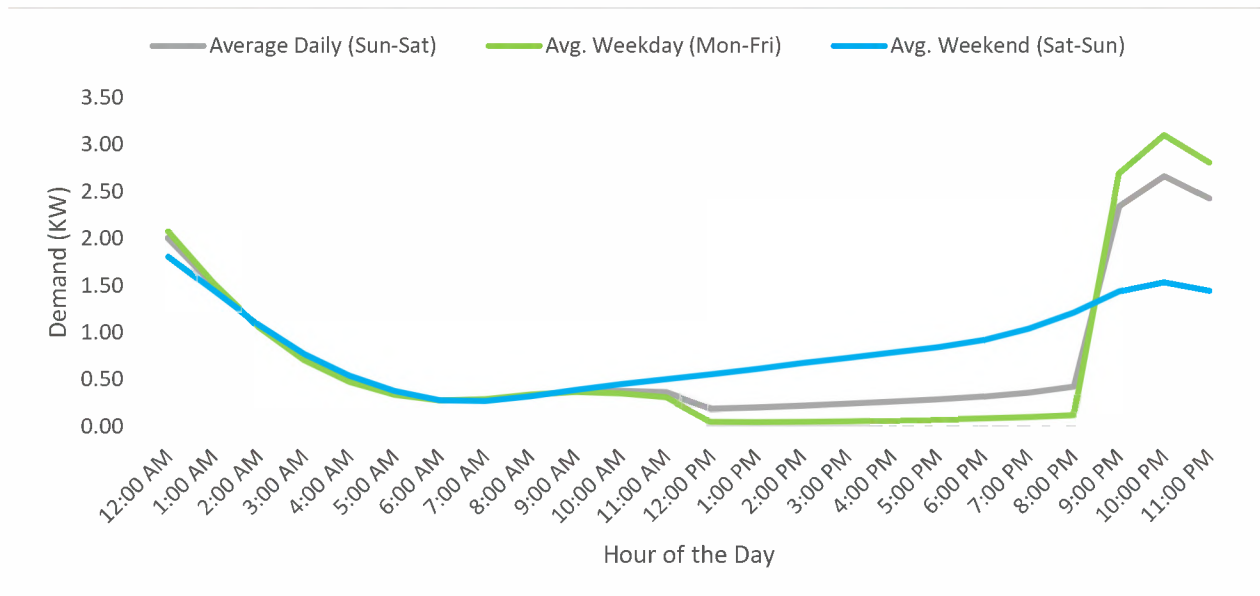


Category	Aug	Sep	Oct	Nov	Dec	Total
Sessions	136,606	144,261	152,096	159,876	162,973	1,450,649
Energy On-Peak (kWh)	53,134	56,455	70,430	96,144	95,054	654,030
Energy Off-Peak (kWh)	3,017,680	3,619,229	3,598,628	3,874,132	4,053,366	34,370,596

**Chart 2: RS-1EV Average Load Shapes: Dec. 2023 – Mar. 2024 and Nov. 2024**



**Chart 3: RS-1EV Average Load Shapes: Apr. – Oct. 2024**



### Participating Customer Energy Cost Savings Compared to a Traditional TOU Tariff

Attachment 3 includes a demonstration of participating customer’s cost savings under RS-1EV as compared to a traditional time of use tariff (RTR-1).

### C. FPL EVolution Fleet

The FPL EVolution Fleet program includes a subset of the initial EVolution pilot and the Commercial EV Charging Services pilot. Program uptake of the initial fleet pilot was delayed due to a variety of factors including technical, economic, and operational feasibility of electrification by fleet operators and vehicle availability. As of December 31, 2024, 11 fleet customers including five school districts were enrolled. Of the 11 customers participating in the pilot, 10 sites were placed in-service in 2024. Customer enrollments in the initial pilot ceased in 2022, and charging stations are expected to be in-service by mid-2025. Table 4 includes a summary of installed and planned ports by charger type for the initial fleet pilot.

**Table 4: FPL EVolution Fleet Pilot Installed and Planned Ports by Charger Type**

Charger Type	Ports			Average Port per Site	Average Cost per Installed Port
	Installed	In Progress	Total		
Level 2	94	0	94	10	22,500
Fast Charge	180	10	190	10	63,407

In 2022, FPL launched the Commercial EV Charging Services Pilot, a voluntary tariff for Commercial customers who desire EV charging services for fleet through the installation of FPL-owned, operated and maintained electric vehicle supply equipment on a customer’s premise, which was approved by the FPSC under Order 0446. Under the tariff, customers will pay a fixed monthly charge, established via a formula-based rate to allow for individual customer pricing designed to recover all costs and expenses over the life of the assets and be CPVRR-neutral to the general body of customers over the applicable term. Program participation depends on technical, economic, and operational feasibility of electrification and fleet vehicle availability among other factors. Given the nascent stage of fleet electrification, the CEVCS-1 tariff enrolled one customer as of December 31, 2024. The charging stations for the initial customer enrollment are expected to be in-service in early 2025. Early learnings from this pilot indicate that fleet customers need long lead times to transition their fleets, and initial adoption will require significant utility support. FPL incurred approximately \$60,000 in customer outreach and origination related O&M expenses in 2024 associated with the Commercial EV Charging Services Pilot.

## III. RATE SCHEDULES GSD-1EV AND GSLD-1EV

As of December 31, 2024, there are 42 active customer accounts taking service under FPL’s GSD-1EV rate schedule and GSLD-1EV rate schedule. The rates were specifically designed to incentivize and support third-party customers in developing charging infrastructure, recognizing that minimal utilization can discourage private investment because it can make the chargers cost prohibitive due to

long payback periods. The Company provides this rate as an incentive to promote infrastructure development. This offer aims to assist customers until utilization increases and the overall load factor improves.

#### Number of Fast Charging Stations (i.e., Customer Accounts) Taking Service Under the Tariffs

Table 5 provides the number of enrolled customer accounts by month during 2024.

**Table 5: Enrolled Customer Accounts by Month**

Rate Schedule	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
GSD-1EV	50	50	52	54	46	42	41	41	41	39	38	35
GSLD-1EV	10	10	10	10	8	4	4	4	4	4	4	7
Total	60	60	62	64	54	46	45	45	45	43	42	42

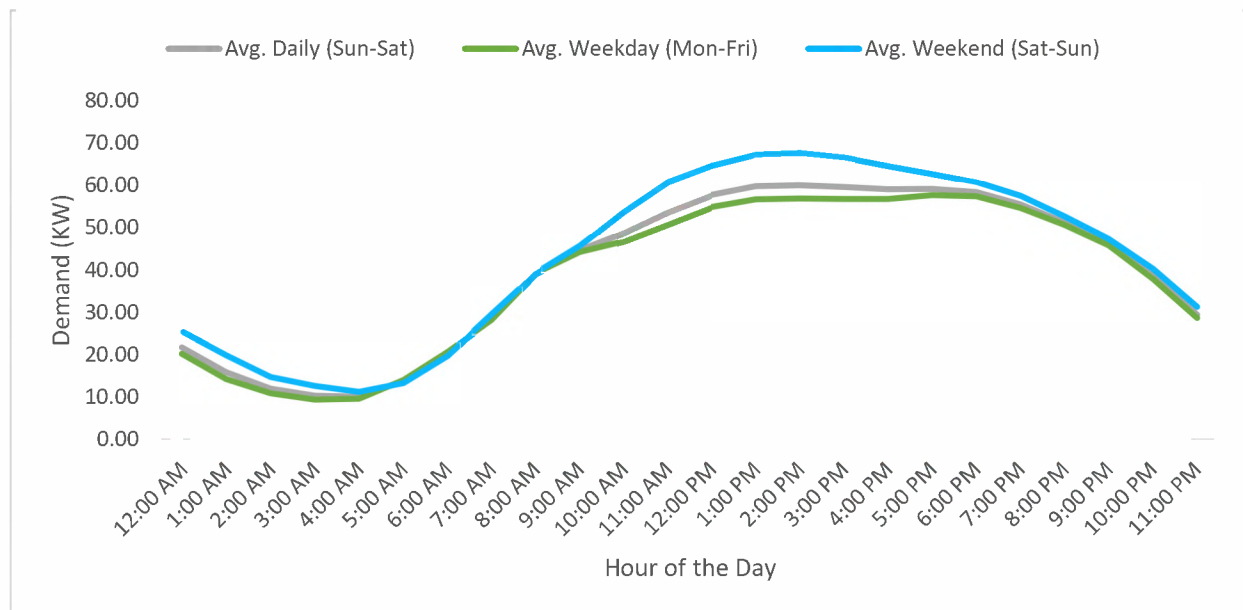
#### Number of Fast Charging Stations that Received the Benefit of Mitigated Demand Charges

As of December 31, 2024, there are 35 customers on GSD-1EV and seven customers on GSLD-1EV, of which 29 customers (45%) have transitioned onto regular rates demonstrating success as utilization grows. A total of 60 stations enrolled in GSD-1EV and GSLD-1EV received the benefit of the demand limiter since January 2024. The stations that did not receive the benefit for 12 consecutive months prior had load factors greater than 10% and were moved to the applicable standard rate.

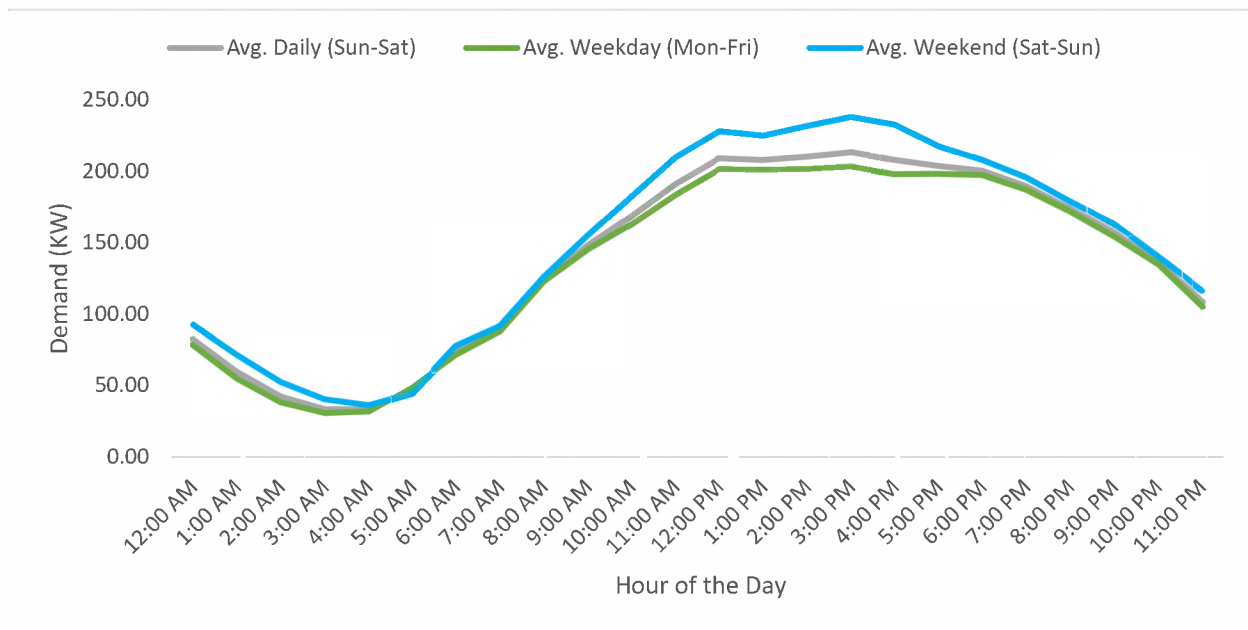
#### Charging Times

Charts 4 and 5 illustrate average hourly load for 42 fast charging locations that operated under the GSD-1EV and GSLD-1EV rate schedules.<sup>7</sup> The load shapes from the stations taking service under the GSD-1EV and GSLD-1EV rate schedules illustrate that public fast charging utilization varies throughout the day, with the greatest utilization occurring between the hours of 8 am and 10 pm ET.

**Chart 4: GSD-1EV Average Load Shape**



**Chart 5: GSLD-1EV Average Load Shape**



#### Annual Revenue Loss Resulting from the Reduction in Demand-Related Revenues

Table 6 summarizes energy sales, revenue billed, and demand limiter offset<sup>10</sup> by rate schedule as of December 31, 2024.

**Table 6: Energy Sales, Revenue and Revenue Offset by Rate Schedule**

Rate Schedule	Energy Sales (MWh)	Base Revenue Billed	Clause Revenue Billed	Total Revenue Billed	Demand Limiter Offset
GSD-1EV	14,962	\$1,566,211	\$718,172	\$2,284,382	\$197,377
GSLD-1EV	7,537	\$727,372	\$352,209	\$1,079,582	\$7,013
Total <sup>11</sup>	22,499	\$2,293,583	\$1,070,381	\$3,363,964	\$204,390

The EV demand limiter tariffs (GSD-1EV and GSLD-1EV) were designed as a catalyst for EV charging services investments. While FPL shows demand-related revenue loss in these early years, there is also \$2.3 million in revenues collected from customers through these tariffs that may not have otherwise materialized. Further, as these customers transition to a standard rate with increased EV charger utilization, full demand-related revenues are expected from these customers over the long term.

<sup>10</sup> Demand limiter offset represents additional revenue that would have been collected, had the charging locations been billed under GSD-1 and GSLD-1, instead of GSD-1EV and GSLD-1EV, respectively; assuming that the charging locations were still constructed and operated the same.

<sup>11</sup> Totals may not add due to rounding.

<div style="text-align: right;"> <b>Florida Power &amp; Light Company</b>  <b>2024 UEV Revenue Requirements</b>  <b>Attachment 1</b>  <b>Page 1 of 1</b> </div>		
<b>ANNUAL REPORT <sup>(1)</sup></b> <b>UTILITY OWNED FAST CHARGING STATIONS - UEV PILOT TARIFF</b> <b>FOR THE PERIOD: JANUARY THROUGH DECEMBER 2024</b> <b>(\$000)</b>		
		<b>Actual</b>
		<b>2024</b>
1	Energy Sales (kWh)	11,162,344
2	Capital Expenditures <sup>(2)</sup>	\$ 49,367
3		
4	<b><u>Charging Station Revenue Requirements</u></b>	
5	<b><u>Operating Costs</u></b>	
6	Depreciation Expense	\$ 1,739
7	Operating and Maintenance Expenses	480
8	Taxes Other Than Income Taxes (Property and Payroll Taxes)	210
9	Total Operating Costs	\$ 2,430
10		
11	<b><u>Capital Costs</u></b>	
12	Rate Base <sup>(3)</sup>	\$ 26,205
13	Pre Tax Rate of Return <sup>(4)</sup>	8.85%
14	Return on Rate Base	Line 12 x Line 13 \$ 2,318
15		
16	<b>Charging Station Revenue Requirements</b>	Line 9 + Line 14 <b>\$ 4,748</b>
17		
18	Income Tax Credits <sup>(5)</sup>	<b>\$ (668)</b>
19		
20	<b>Net Charging Station Revenue Requirements</b>	Line 16 + Line 18 <b>\$ 4,080</b>
21		
22	<b><u>Revenue Requirements for Electricity Sold from Charging Stations</u></b>	
23	Base Revenue Requirements <sup>(6)</sup>	\$ 1,275
24	Clause Revenue Requirements <sup>(7)</sup>	387
25	<b>Total Rev Req for Electricity Sold from Charging Stations</b>	Line 23 + Line 24 <b>\$ 1,661</b>
26		
27	<b>Total Revenue Requirements</b>	Line 20 + Line 25 <b>\$ 5,741</b>
28		
29	Revenues Collected	\$ 3,354
30		
31	<b>Net (Revenues)/Costs for December 2024</b>	Line 27 - Line 29 <b>\$ 2,387</b>

**Notes:**

- <sup>(1)</sup> Represents reporting requirements for FPL's utility owned fast charging stations placed in-service through December 2024 under the UEV Tariff as required by Order No. PSC-2020-0512-TRF-EI, Docket No. 20200170-EI.
- <sup>(2)</sup> Represents total capital expenditures incurred for all utility fast charging stations through December 2024 to be recovered under the UEV tariff rate.
- <sup>(3)</sup> Represents the December 2024 13-month average of net plant in-service of utility-fast charging stations recovered under the UEV tariff rate.
- <sup>(4)</sup> Based on FPL's 2024 Forecasted ESR using a ROE of 10.8% as approved in Docket No. 20210015-EI, Order No. PSC-2022-0358-FOF-EI approving FPL's Notice of Triggering Revised Authorized Return on Equity.
- <sup>(5)</sup> Includes income tax credits allowed for 30% of the costs of any qualified alternative fuel vehicle refueling property placed in-service after 2022 and started construction before January 29, 2023. For qualified locations placed in-service in 2024, the income tax credits were reduced to 6% of the costs. This income tax credit is limited to \$100,000 per qualified location. Note this amount includes credits for assets in 2023 and 2024.

<div> <div>Florida Power &amp; Light Company</div> <div>2024 RS-1EV Revenue Requirement</div> <div>Attachment 2</div> <div>Page 1 of 1</div> </div>		
<div> <div>ANNUAL REPORT<sup>(1)</sup></div> <div>RESIDENTIAL ELECTRIC VEHICLE SERVICES RIDER PILOT (RS-1EV)</div> <div>FOR THE PERIOD: JANUARY THROUGH DECEMBER 2024</div> <div>(\$000)</div> </div>		
		Actual 2024
1	Energy Sales (kWh)	35,024,626
2	Capital Expenditures <sup>(2)</sup>	\$ 14,557
3		
4	<b>Level 2 Charger Revenue Requirements</b>	
5	<u>Operating Costs</u>	
6	Depreciation Expense	\$ 546
7	Operating and Maintenance Expenses	2,512
8	Taxes Other Than Income Taxes (Property and Payroll Taxes)	140
9	Total Operating Costs	\$ 3,198
10		
11	<u>Capital Costs</u>	
12	Rate Base <sup>(3)</sup>	\$ 8,574
13	Pre Tax Rate of Return <sup>(4)</sup>	8.85%
14	Return on Rate Base	Line 12 x Line 13 \$ 758
15		
16	<b>Level 2 Charger Revenue Requirements</b>	Line 9 + Line 14 <b>\$ 3,956</b>
17		
18	Income Tax Credits <sup>(5)</sup>	\$ -
19		
20	<b>Net Level 2 Charger Revenue Requirements</b>	Line 16 + Line 18 <b>\$ 3,956</b>
21		
22	<b>Revenue Requirements for Electricity Sold from Level 2 Chargers</b>	
23	Base Revenue Requirements <sup>(6)</sup>	\$ 670
24	Clause Revenue Requirements <sup>(7)</sup>	1,408
25	<b>Total Rev Req for Electricity Sold from Level 2 Chargers</b>	Line 23 + Line 24 <b>\$ 2,077</b>
26		
27	<b>Total Revenue Requirements</b>	Line 20 + Line 25 <b>\$ 6,034</b>
28		
29	Revenues Collected	\$ 2,532
30		
31	<b>Net (Revenues)/Costs for 2024</b>	Line 27 - Line 29 <b>\$ 3,502</b>

Notes:

- (1) Represents reporting requirements for FPL's RS-1EV level 2 chargers placed in-service through December 2024 under the new voluntary tariff for residential customers as required by Order No. PSC-2021-0446-S-EI in Docket No. 20210015-EI.
- (2) Represents total capital expenditures incurred for all RS-1EV level 2 chargers through December 2024 to be recovered under the new voluntary tariff for residential customers.
- (3) Represents the 2024 December 13-month average of net plant in-service of RS-1EV level 2 chargers recovered under the new voluntary tariff for residential customers.
- (4) Based on FPL's 2024 Forecasted ESR using a ROE of 10.8% as approved in Docket No. 20210015-EI, Order No. PSC-2022-0358-FOF-EI approving FPL's Notice of Triggering Revised Authorized Return on Equity.
- (5) RS-1EV level 2 chargers do not qualify for income tax credits.
- (6) Revenue requirements were calculated using FPSC approved base rates for the RTR-1 rate schedule and actual kWh billed to RS-EV customers from Jan 2024 to Dec 2024.
- (7) Revenue requirements were calculated using FPSC approved clause factors for the RTR-1 rate schedule and actual kWh billed to RS-EV customers from Jan 2024 to Dec 2024.

**Florida Power & Light Company**  
**2024 RTR-1 Bill Comparison to RS-1EV**  
**Attachment No. 3**  
**Page 1 of 1**

**RTR-1 Bill Comparison to RS-1EV**

	<b>Component</b>	<b>December 2024 Actuals</b>	<b>Average RS-1EV Customer<sup>(1)</sup></b>	
1	Customers	8,389	1	
2	Sales (KWH)	4,148,420	495	
3	First 1000 kWh		495	
4	Over 1000 kWh		0	
5	On-Peak	2.29%	11	
6	Off-Peak	97.71%	484	
7				
8				
9	<b>RTR-1 (TOU)</b>	<b>Unit</b>	<b>Rate<sup>(2)</sup></b>	<b>Amount</b>
10	First 1000 kWh	495	\$0.07117	\$35.23
11	Over 1000 kWh	0	\$0.08116	\$0.00
12	On Peak kWh	11	\$0.12793	\$1.41
13	Off Peak kWh	484	-\$0.05594	-\$27.07
14	Fuel <1,000	495	\$0.02670	\$13.22
15	Fuel >1,000	0	\$0.03670	\$0.00
16	On-Peak Fuel	11	\$0.00533	\$0.06
17	Off-Peak-Fuel	484	-\$0.00226	-\$1.09
18	Capacity	495	\$0.00170	\$0.84
19	Conservation	495	\$0.00124	\$0.61
20	Environmental	495	\$0.00332	\$1.64
21	Storm Protection	495	\$0.00557	\$2.76
22	<b>Total<sup>(3)</sup></b>			<b>\$27.61</b>
23				
24				
25	<b>RS-1EV</b>	<b>Unit</b>	<b>Rate</b>	<b>Amount</b>
26	On Peak kWh	11	\$0.23710	\$2.61
27	Off Peak kWh	484	\$12.81	\$12.81
28	<b>Total</b>			<b>\$15.42</b>
29				
30				
31				
32	<b>Difference (RS-1EV Savings)</b>			<b>-\$12.19</b>

**Notes:**

- (1) Average RS1-EV Customer Usage based on FPL's most current analysis.  
(2) Based on FPSC approved rates for December 2024.  
(3) Excludes Transition Rider/Credit and all taxes.