BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. UNDOCKETED

DEVELOPMENT OF ELECTRIC VEHICLE (EV) MASTER PLAN FOR EV CHARGING STATION INFRASTRUCTURE FOR STATE HIGHWAY SYSTEM, PURSUANT TO CHAPTER 2020-21, LAWS OF FLORIDA.
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PROCEEDINGS:	COMMISSION STAFF WORKSHOP
COMMISSIONERS PARTICIPATING:	COMMISSIONER ART GRAHAM COMMISSIONER JULIE I. BROWN COMMISSIONER DONALD J. POLMANN COMMISSIONER ANDREW GILES FAY
DATE:	Wednesday, October 21, 2020
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PLACE:	Betty Easley Conference Center Room 148 4075 Esplanade Way Tallahassee, Florida
REPORTED BY:	DEBRA R. KRICK Court Reporter

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P R O C E E D I N G S

MR. CRAWFORD: All right. It's ten o'clock so I guess we can get started.

Good morning. First can we please have the attorney read the notice? Adria?

MS. HARPER: Yes, I am here. Give me just a second here.

MR. CRAWFORD: Thank you.

MS. HARPER: Make sure my phone sound is good. Can you guys hear me okay?

MR. STADEN: We can hear you just fine. Go ahead.

MS. HARPER: Great.

Pursuant to notice, this time and place a Commission Staff Workshop for the development of an electric vehicle, EV, master plan for the EV charging station infrastructure pursuant to Chapter 2020-20 -- excuse me, Chapter 2020-21 Laws of Florida.

UNIDENDIFIED SPEAKER: Okay. I will make you some lunch if you want, like, half a sandwich. No sandwich. Cereal?

MR. CRAWFORD: Let me please remind everybody to please mute your phone, if you have not already muted your phone, if you are not speaking. We just

had somebody who I think was ordering -- right.

Thank you, Adria, for the notice.

My name is Ben Crawford. I am a Public Utility Supervisor in the Office of Industry Development Market Analysis at the Public Service Commission.

Today's workshop is intended to consult with the stakeholders in the electric vehicle industry who filed comments concerning the PSC's obligations from Senate Bill 7018 in response to our September 2nd, 2020, request for comment.

Senate Bill 7018 was passed by the Legislature on March 11th, 2020, and approved by the Governor on June 9th, 2020. The bill requires the Florida Department of Transportation, in consultation with the Florida Public Service Commission and the Energy Office of the Florida Department of Agricultural and Consumer Services, coordinate, develop and recommend a master plan in the development of electric vehicle charging station infrastructure along the State Highway System. This plan is due to the Governor, the President of the Senate and the Speaker of the House of Representatives on July 1st, 2021.

Senate Bill 7018 assigned numerous duties to

the Commission in support of the development of the master plan. These duties include projecting the deployment of electric vehicles in Florida over the next 20 years in determining how to ensure an adequate supply of charging stations, evaluating and comparing the types of electric vehicle charging stations available now and in the future, and any advantages to developing particular types or uses of these things.

Considering strategies to develop the supply of charging stations, including partnerships with other governmental and private stakeholders, identifying regulatory structures necessary for the delivery of electricity to charging stations and reviewing emerging technologies in the electric and alternative vehicle market, including alternative vehicle sources.

While some of these obligations are in the process of being met through staff research, others of these staff sought out comments from stakeholders in the industry through a request for comment on September 2nd asking for a response by October 2nd, 2020.

Staff received 15 sets of comments from the following commenters: City of Tallahassee, Duke

Energy Florida, Florida Power & Light and Gulf Power Company, JEA, OUC, Tampa Electric Company, Advanced Energy Economy, Alliance for Transportation Elecrification, ChargePoint, Incorporated, Drive Electric Florida, EVgo, Greenlots, Tesla, Sierra Club and the Southern Alliance for Clean Energy.

The purpose of today's workshop is to discuss the comments filed by these stakeholders and Commission Staff's initial impressions received from stakeholders. The format will be a roundtable discussion, with commenters going in the order listed in the notice, which is the order I just read. The discussion will be divided into three sections, each dedicated to one of the broader questions asked in our initial request for comments.

A little about the format. In order to avoid people talking over each other, I will be calling on each participant in order to give everyone an opportunity to respond. So feel compelled to respond to every question. If you don't feel like you have anything meaningful to add to the topic, you are free to say no response.

Also, I said this once and I can't emphasize

it enough. Please mute your phone or microphone -- (inaudible) -- speak.

Additionally, I would like to add that this workshop does not address any specific dockets, and I would ask that all participants please avoid discussing any open dockets or dockets they anticipating opening in 180 days.

And with that, I would like to move to the first question.

For the first question, the Commission asked stakeholders to project the increase in the use of electric vehicles in Florida over the next 20 years in determining how to ensure an adequate supply of reliable electric vehicle charging stations to support and encourage this growth in a manner supporting a competitive market and consumer choice.

Staff asked stakeholders to provide a 10-year and 20-year projection for increased EV use in Florida, including the data source of such protection, and to provide an estimate of a number of charging stations that will be needed to meet the demand presented by these 10 and 20-year projections.

Relatively few comments were able to provide

projections over the time period asked. Utilities all provided projections for their service territory, but the remaining commenters from the Sierra Club was capable of providing projections for the whole state.

As a result, staff's thinking on this issue is to use a variety of sources to provide estimates and service of the master plan. In addition to the Sierra Club's estimate, staff was considering the use of Bloomberg energy new finance's 2020 Electric Vehicle Outlook. According to the BNEF's forecast, there will be approximately 1.4 million EVs on the road in Florida in 2030, and 7.2 million EVs on the road in Florida in 2040.

Staff also intends to incorporate projections from the Florida Department of Transportation. The charging station, staff is considering using the EVI-Pro Lite tool referenced by a few respondents that can be found on the U.S. Department of Energy's alternative data fuels data center web page.

What I would like to ask the commenters is this: Are there any resources or tools that you feel the Commission is overlooking in order to project the number of EVs or needed charging

stations in Florida over the next 20 years? How can the staff best use the numbers provided by the utilities for a whole state estimate?

And before you answer, I would like to remind the participants, this workshop was noticed for two hours, so please tailor your answers with that in mind.

I also want to emphasize that this is a question we anticipate the least responses on just given the nature of the comments we received, so this is going to partially just be a rung to get you used to how the format -- (inaudible).

But with that in mind, the first to speak is the first in the notice, I would like to hear from the City of Tallahassee.

MR. COWART: Yes. Thank you. This is Ben Cowart with the City of Tallahassee.

First, I would like to say that the City of Tallahassee wants to go on record that we are not in the business of selling automobiles, and specifically EVs, and we feel that the Public Service Commission should be addressing these type of automobiles to the manufacturers. But given that, we did look at industry standards, and I think our 1.6 estimate for the state compares

favorably to your 1.4, I think that you said, in the timeframe of 2030. And then, it sounds like you used the same calculator we did for figuring the number of chargers needed.

And so sum that opening statement up, I think that the City feels the tools the PSC needs to use is to query the EV manufacturers and automobile manufacturers, and then we can accurately base our projections for charging needs based on what the manufacturers are projecting.

MR. CRAWFORD: All right. Thank you very much.

MR. COWART: And that closes my comments.

MR. CRAWFORD: Thank you very much.

Duke Energy Florida -- and let me also ask, when people are finished, can you please just signal that in some way, say thanks, or that's it, or something along those lines, we know to move on? Thank you.

Duke Energy Florida.

MR. REYNOLDS: Thank you. This is Lang Reynolds for Duke Energy Florida.

I think what you mentioned as far as combining -- or sourcing a forecast from Bloomberg Energy Finance, and perhaps other sources, seems

like a reasonable approach.

I think the only feedback I would offer on that right now is it's probably a good idea to get a few different forecasts. There are a lot of different resources available for EV forecasting, and consulting firms, et cetera, that are working on this. So I think it makes sense to forecast potentially a range of scenarios, or at least a small number of scenarios.

And likewise, with the charging station deployments EVI-Pro Lite is what we did use for our estimates; but again, there are other -- other resources out there, so it probably makes sense to look at a few different scenarios when forecasting out that far in the future.

Thank you.

MR. CRAWFORD: Thank you.

Florida Power & Light Company and Gulf Power Company.

MS. DVARECKAS: Yes. Hi. Good morning. This is Jill Dvareckas from Florida Power & Light Company.

I would agree with the statements that Duke Energy just made. I think the only thing I have to add is that I would encourage -- I would encourage

the Commission to ensure that whatever forecast that is being used, understanding that it is not static, and that there be some flexibility and transparency with how this forecast is applied.

Finished.

MR. CRAWFORD: Thank you.

JEA.

MR. LEIGH: This is -- (inaudible) -- with JEA.

JEA would just like to say that we agree with the previous commenters and have nothing else to add.

Thank you.

MR. CRAWFORD: Thank you. Okay you8.

MR. WESTLAKE: Hi, this is Pete Westlake. Can you do me a favor and repeat your projection for 2030?

MR. CRAWFORD: Yeah. We had 1.4 for 2030. 1.4 million.

MR. WESTLAKE: Okay. So we agree with using the sources that you are using. I would encourage having a prediction that is -- has two bookends, so a prediction that has a maximum amount so that you are looking at if things go fairly strongly or if things go as they go today.

MR. CRAWFORD: Thank you.

TECO. I am sorry? TECO.

MR. HERNANDEZ: Yes. This is Kenneth Hernandez with Tampa Electric.

We would agree with the comments that you have heard so far, particularly highlighting the benefit from a low/medium/high scenario, and the fact that it is a living forecast. It needs to be updated on a regular basis.

Thank you.

MR. CRAWFORD: Thank you.

Advanced Energy Economy.

MR. GARCIA: Hi. This is Noah Garcia with AEE.

I know in our comments, we reference both the BNEF scenario you used as well as EEI's forecast for EV penetration in Florida going forward, and I think we arrived at very similar numbers, so we invite the Commission to revisit those estimates if it finds it useful.

And the only thing we would just add to that is that these projections aren't static, and that the action that the Commission decides to take can ultimately influence the number of EVs that we will expect to find in the state moving forward.

So I think we will conclude there. Thank you.

MR. CRAWFORD: Thank you.

The Alliance for Transportation Electrification.

MR. JONES: Yeah, this is Phil Jones with the Alliance.

I would agree with most commenters, use the EVI-Pro Lite tool, the assumptions you used between the different models will be critical, so I agree with the comments on keeping it dynamic rather than static using a range like you do in IRP load forecasts, that would be good.

There are a couple of other Wall Street and other investment houses that offer forecasts, but they are national, you would have to break them down for Florida. So you may want to, as Mr. Reynolds said, look the a couple other sources like Wood Mackenzie and a couple of the Wall Street investment houses that have strong research units.

I am done. Thanks.

MR. CRAWFORD: Thank you.

ChargePoint.

MR. WILSON: Yes. Thank you.

ChargePoint generally agrees with the direction and the outline. We would support

updating this on, perhaps, an annual basis for the next five years. We believe that we could see a big percentage -- annual percentage increase in certain segments such as commercial light duty, commercial medium duty and commercial heavy duty, and understanding early in your process the impact of that -- those segments of vehicle adoption could be critical for year 2030 and 2040 numbers.

Thank you.

MR. CRAWFORD: Thank you.

Drive Electric Florida.

MR. ALFORD: Yes. Good morning.

And I just want to first of all say thank you to the Commission and their staff. We appreciate you holding this meeting. This is sort of like a version of Drive Electric Florida's policy committee almost. And you have got an incredible group here, and I just hope that all of you learn as much from them as I have.

Two observations about that, right? So FDOT has examined a few projections, and they are broadly in line with credible industry projections. And I just want to echo AEE's comments that decisions the Commission takes will impact the forecast. So making sure we've got a regulatory

paradigm in place that expands the use of EVs will be critical.

And then the second observation is that it won't be enough just to look at vehicle registrations in Florida in normal times, in good times. We are also going to need to account for Florida's hundred million plus visitors, and we are going to need to be able to get them here for markets that might have higher market penetration for EVs.

So those are kind of the only two thoughts I have surrounding this question.

MR. CRAWFORD: Thank you.

EVgo.

MS. DUMIT: Hi. Good morning. This is Carine Dumit. I think my colleague is also on the line, Adam.

I don't know that I have much more to add. I think I echo the comments made earlier by AEE in terms of, I think, being dynamic, and then the decisions from this discussion and this -- (inaudible) -- and the PSC's decision will ultimately have an impact for sure on the deployment.

So nothing further to add -- (inaudible) --

MR. CRAWFORD: Thank you.

Greenlots.

MR. COHEN: Hi. Good morning. This is Josh Cohen with Greenlots. And I would generally echo some of the previous comments that -- that all of these projections need to be considered as living documents, because just from the policy and regulatory standpoint, as well as in terms of the technical product development standpoint, there is so many variables that, in turn, will affect future projection. But at a high level, I think from Greenlots' perspective, even some of the rosiest projections we've seen, even from credible industry sources, we believe those may be coming out too low, particularly when you consider the improvements in battery technology, the decline in cost, and the fact that pretty much everyone in the industry believes we are going to hit an inflection point sometime in the middle of this decade, where when cost parity comes in, you are just going to see a hockey stick level of growth in the EV industry broadly, as well as in some specific segments that Justin mentioned from ChargePoint.

So that's just our one caution, which is prepare for all these estimates actually being too

low, and what those implications mean, not only for infrastructure deployment, but also for load on the grid.

Thank you.

MR. CRAWFORD: Thank you.

Tesla, please.

MR. BEAN: Good morning. This is Patrick Bean from Tesla.

I agree with the previous comments about using the aforementioned reports as kind of the best available information we have at this time in living documents.

As an OEM, our perspective, as Tesla, we would like all electric vehicle sales to be electric -- or I am sorry, all vehicle sales in the future to be electric, so perhaps we are a little bit biased on that.

And then in terms of infrastructure, it might be worth looking at the International Clean Council -- I am sorry, International Council on Clean Transportation and some of the research they've done to try to quantify electric vehicle charging gaps.

Thank you.

MR. CRAWFORD: Thank you.

Sierra Club.

MR. SHOAFF: Yeah, this is that Nathaniel Shoaff from Sierra Club. I will make two quick points.

One is one of the reasons that in our comments we advocated the Commission use the NEF's forecast for EV growth is that it is updated annually. So as others have noted, this is not going to be -- the projections are not going to be static. They are going to change as the Commission and the State implements various policies that will respond to any federal incentives that are in place for EV purchases.

And then the other point I would like to make is that using the EV-Pro Lite tool, which Sierra Club and others on this call have recommended that the Commission use for moving from projections for EV growth to the necessary amount of charging infrastructure to support that growth, is that although the Commission's specific task from SB 7018 is to focus on state highways, that Pro Lite tool, one of the reasons it's so helpful is that it doesn't just identify an amount of DC fast charging that's necessary, but it also quantifies the amount of public Level 2 -- and workplace Level 2

chargers, which is where currently there is a big gap in Florida. And so we hope that the Commission will take this opportunity to also recommend strategies to bolster that broader charging infrastructure beyond just the State Highway System.

Thank you very much.

MR. CRAWFORD: Thank you.

And the Southern Alliance for Clean Energy.

MR. CROSS: Hello. This is Stan Cross from SACE. And I just want to agree with what's been stated so far.

The only additional comments I would make is when it comes to forecasting EV registrations in Florida, I think the point that, you know, both ChargePoint and Greenlots have made a really important in that, you know, medium/heavy duty sector is likely to grow over this next decade, and it would be good to prepare for a hockey stick trigger of growth mid-decade should that occur, and have done the planning to account for that.

The other thing that, you know, Drive Electric Florida noted with paying attention to tourists, I think also, you know, doing the best we can to pay attention to snowbirds, winter resident counts as

more of the vehicles they bring in the state may not be registered in the state are electric.

And lastly, when using the EV-Pro Lite tool, as we noted in our comments, the variables that are able to be manipulated in that tool can really change the output of that tool. I think it's important to pay attention to the spread between pure battery electric vehicles and plug-in hybrid electric vehicles both in the forecast and also how that gets implemented into the EV-Pro Lite tool. Currently, battery electric vehicles are pulling ahead of hybrid vehicles. And if that continues to happen, then that will trigger the need for more chargers. And also paying attention to the number of residents that have access to home charging, and making sure that we are accounting for the growing population in multi-unit dwellings and multi-family housing, as well as renters who may not have access to home charging, changing that variable will also impact how much fast charging Level 2 and workplace charging is needed to support the market.

Thank you.

MR. CRAWFORD: All right. Thank you, everyone.

Now unless anyone who hasn't spoken yet has

something we would like to add, we can move on to the next set of questions.

All right. Let's move on to the next topic of discussion.

The next of the duties we are discussing today assigned to the Commission Senate Bill 7018 is the following:

Considering strategies develop the supply of charging stations including, but not limited to, methods of building partnerships with local governments, other state and federal entities, electric utilities, the business community and the public in support of electric vehicle charging stations.

We received some very good responses from our participants, and asking questions on this topic will be Shelby Eichler.

Shelby.

MS. EICHLER: Hello. Thank you, Ben.

Can you hear me?

MR. CRAWFORD: Yeah, we can hear you fine, Shelby. Thanks.

MS. EICHLER: Okay. Great.

So for Section 2 of the responses, I am going to read through a few ideas that we wanted to

highlight, and then I am going to ask a couple of questions, and then we have two subsections in the second question, so I am going to break those up and then I will read a couple more ideas, and then I had a couple of questions on those as well. And again, I will go down through the list once I get through the question part, and we will go participant by participant. And if you don't have a response, that's okay, just pass.

All right. So a popular utility and third-party option suggested in the data request responses was a make-ready investment. This would be where a utility provides the infrastructure, primarily conduit and wiring, for EV charging station leading up to the sub where the nonutility EV service provider would be located and operating. The resulting -- (inaudible) -- could actually be owned or installed by any third-party host, and subsequently be maintained by the nonutility EV service provider or the site host.

Another possible option involves the utility entering a leasing agreement with a nonutility EV service provider and providing a flat subscription service for the customer. In this example, the utility would own the asset until the send of its

useful life.

Similar joint ventures are also possible either with cities, counties or non -- other non-government organizations for providing charging infrastructure.

Next we have kind of a rebate model. Utilities can issue rebates to third parties to help with initial cost of installing charging -- chargers. Those costs could be capitalized and put in rate base, as is being done in Michigan and Minnesota. The utility can also issue request for proposals for turnkey services from third-party providers, or make bulk purchases under an own-and-operate model for a utility.

Another option includes state contracts that can be negotiated with multiple charging station vendors, which would be a cost-effective approach possibly. This would also allow for less time expended by all the utilities and municipalities and push release cost solutions.

Finally, in the process of developing streamline charging stations, there is also an opportunity for billing partnerships between state and local governments and charging stations. Streamlining EV charging station permitting is

important for ensuring the infrastructure development needed to support EV deployment in a cost-effective and timely manner that keeps pace with driver needs.

So that's the five, kind of, topics for the first section of the second part of today's workshop that I am going to be going over, and then I have five questions that I would like to ask.

The first one -- the first question is: Are there any concerns on the similarity or streamlining of EV chargers for customers, or is there a consensus and acceptance around increased deployment bringing variability to EV charging station equipment?

And then we will start with the City of Tallahassee.

MR. COWART: Could you repeat the question that you are -- that you just said, please?

MS. EICHLER: Yes.

Are there any concerns on the similarity or streamlining of EV chargers for the customers, or is there a consensus and acceptance around the fact that increased deployment will bring variability to EV charging station equipment?

MR. COWART: So again, this is Ben Cowart,

City of Tallahassee.

Tallahassee believes that, as most industry experts point to, that the majority of EV charging on the residential customer level will take place at their home, you know, after peak, or during the nighttime.

We see the deployment of public access charging stations in a couple of different lights. One is economic development. If we have available charging, makes Tallahassee maybe a more desirable tourist stop for those visiting for whatever event, they know that they can charge here. And then for those resident drivers that need an occasional charge while they are out, we will capture that market too.

And with that, we've embraced the EV charging public access and started a program called Power TLH, Charge at the Star, where we are actually installing public access stations around our service territory that include Level 2 -- some combination of Level 2 and DC fast charge. And then those will be done along what may be evacuation routes to I-10, or located close to I-10 so travelers can drop off, charge and then proceed on their destination.

We don't see a real conflict between what the residential customer may be doing behind their meter with their EV versus what may take place with EV charging in the public arena.

And that ends my comments.

MS. EICHLER: Okay. Thank you.

Duke Energy.

MR. REYNOLDS: This is Lang Reynolds for Duke Energy again.

A little bit -- I guess I am a little bit unclear what you are asking about. It sounds like you are asking about interoperability of charging stations, and there is several levels of that from the kind of the back end networking piece of it to the plugs and charger hardware that's actually plugged into the car and then the customer facing the point of sale and networks and the different networks that are out there.

So I guess in terms of concerns with similarity or streamlining it, I think in terms of the standards on a Level 2 side of things, we've seen a convergence around the J1772 standards that all cars can use. On the DC fast side of things, there is still multiple charging plugs that are out there. It would be nice if the automotive industry

could -- could converge on one standard.

But I think that, from our standpoint, and thinking about utility programs and other programs that the Commission could have purview over, or make recommendations on as part of this proceeding, I think the most important piece of this is interoperability on the -- between the networks and the hardware, to ensure that hardware that's deployed under utility programs, and other programs funded by government grants or other grant programs, do not become stranded assets, so that they can be communicated with on multiple networks, and so that we don't see deployments that -- that become stranded assets, as some have over the past few years across the country.

So I think that's -- that's how we would address that question. Thank you.

MS. EICHLER: Thank you.

Florida Power & Light.

MS. DVARECKAS: Yes. Hi. This is Jill Dvareckas from Florida Power & Light again.

I would just like to clarify whether that was the right interpretation of the question, is interoperability what you are looking at for charging type?

MS. EICHLER: When -- I am talking about concerns for the customer on similarity of streamlining. Do -- as the market grows, is it a general consensus, and is -- do we think it's okay that we are going to see all these charging stations pop up, and they made everyone look different from the next one; or is there a concern for -- to make EV customers, charging customers, feel more comfortable, should we streamline the way they look and the way they operate so that we increase comfortability for the EV charging customer when -- so that when they are driving across the state of Florida, they don't avoid certain stations because they are not familiar, or they have never seen one that looks like that before, that type of thing.

MS. DVARECKAS: Great. Thank you for that clarification.

So I would echo, then -- I would echo, then, Duke's response that, you know, I do believe that the interoperability between networking hardware, you know, is important. It's also important that there not be stranded assets.

When it comes to the customer's experience, I think that this is where it's important that

network service providers be able, you know, as well as utilities, where they are owning and operating infrastructure, be able to ensure that the customers do have a consistent and simple, clear process.

I think that what we are seeing in the market is various networks that offer that to a customer base that may be specifically loyal to that charging network service provider. However, you are also seeing roaming agreements start to pop up within the market that enable a customer that would typically use one service provider to use another station while also maintaining the same experience, same app, same access and same rate.

I think that at this early stage in the market, it's important to allow the market to dictate what is appropriate. So I think, really, at this point, it's important to allow various business models to be -- to be explored. And I think too much upfront streamlining may limit competition in market growth and innovation.

Thank you.

MS. EICHLER: All right. Thank you.

Next we have Gulf Power Company.

MS. DVARECKAS: Yes, and this is Jill

Dvareckas. I am speaking on behalf, sorry, of FPL and Gulf Power Company.

MS. EICHLER: I am sorry. I was thinking that might be the case.

Okay. JEA.

MR. LEIGH: Yeah. This is Tim Lee with JEA. And just would echo Duke and FPL/Gulf's comments that, you know, this will be a national super regional evolution of a market, and given our early stage in the growth of this market, we need to allow third parties the creativity to really look at marketing packages and as well as charger types and optionality associated with it, with the emphasis on interoperability, particularly with data exchange.

I think there is some basic issues that need to be considered. Namely like hygienic of a station. Is it clean? Is it attractive? Maybe common signage across the state. The performance is kind of the bottom line that the consumer is looking for, and then also safety. And perhaps, you know, something as simple as including a camera in some of the charging stations could be a concept. But definitely need to allow the market to evolve, both within Florida and beyond Florida.

Thank you.

MS. EICHLER: Thank you.

OUC.

MR. WESTLAKE: Yes, OUC believes that the consistency is required, particularly in the high speed charging hubs. I should not have to decide which -- which hub I go to based on vehicle type and charging type. That should be ubiquitous.

Billing approach should also be consistent across all versions. So I should be able to go to a site and not have to download an app before charging.

If you look at it in view of what I do -- what I might do if I were driving a ICE vehicle, I don't think about the gas that I am going to consume there. I can get gas at any station. It's just based on preference on -- on the type of fuel station.

So we need to get to that level, so when we are deploying a very expensive high speed charging network across Florida, we should put those considerations in mind. So either the station has to be able to handle all vehicle types, or we need to go to an -- ideally go to a consistent charging type.

Thank you.

MS. EICHLER: All right. Thank you.

Tampa Electric Company.

MR. HERNANDEZ: Yes. Hello, this is Kenneth Hernandez with Tampa Electric.

I think we would echo what we heard from both Duke and FPL, particularly with respect to interoperability, and really the support that network and hardware providers in the market can lend towards the customer experience in terms of consistency and their use.

Thank you.

MS. ELCHLER: Thank you.

Advanced Energy Economy.

MR. GARCIA: Yes. Thank you. This is Noah Garcia again.

I think, again, we generally agree with the comments raised by FPL and Duke, again, with regard to interoperability.

With respect to the hardware, there is certainly already industry convergence around plug standards that don't necessarily require, you know, Commission consideration or contemplation, but certainly on the network side, we are really interested in making sure that these stations don't

become stranded assets, and that they are capable of sharing information -- charging information, other -- other sorts of data with the Commission as it deems necessary to better understand the EV charging services market.

We also know that given the diversity of potential charging station locations, it's okay if these charging stations look different. A public fast charging station along a highway corridor may inevitably look different than charging that's meant to support multi-unit dwellings. So we ask that the Commission not try to narrowly focus on streamlining all charging infrastructure to look the same, but rather taking note of where this charging infrastructure is being deployed, and how it should best be positioned to become used and useful for customer.

Thank you.

MS. EICHLER: Thank you.

Alliance for Transportation Electrification.

MR. JONES: Yeah. This is jim Jones with ATE again.

I would generally agree with the comments of Duke and FPL. There is nothing wrong with having different types of equipment deployed in the

marketplace, hardware and software, but I would urge the Commission to keep interoperability in mind.

Just look at two examples, the wireless telecom industry and the banking industry. Think of the ATMs. And think of roaming agreements among wireless carriers. There was a whole set of protocols and agreements that had to be agreed to to accommodate easy access of the consumer to different types of hardware and software.

So we are a big supporter of protocols like OCPP, Open Charge Point Protocol, on the back end. This is network to charging station. But the Commission should require independent certification of that. Some of the vendors in the marketplace say they are OCPP compliant, but they are not necessarily OCPP compliant.

Then on the front end, it's a good thing CHAdeMO, the Japanese standard, in our view, is going away. Nissan is going to discontinue that plug. In the future, I don't know what that means for existing equipment in Florida and around the country, but the OEMs appear to be, other than Tesla, appear to be solidifying around what we call the universal plug, the J1772 plug. And as we get

to a higher charging level, the truck manufacturers are going to need new connector for higher voltage charging, but that's centered on what is called the J1772, or CCS combo plug. So we think that's good.

If you are talking about public accessibility of charging stations, that's another matter that you may want to have another question about. One of the reasons that utilities need to be involved in this, and the Commission, is the utilities will be providing the fuel, the kilowatt hours and the rate design schemes, and they need the data to have to optimize benefits to do rates for managed charging as penetration increases.

That's it. Thank you.

MS. EICHLER: Thank you.

ChargePoint.

MR. WILSON: Thank you.

I think ChargePoint would broadly echo the comments of FPL and Duke, making sure that we allow charging hardware and network providers and site hosts the ability to continually innovate at this early stage in the market. I think we need to keep prominent the role of the site host and hosting charging stations in the various business models that site hosts my might have; everything from a

restaurant, to a traditional fueling center, to a public library, all of those have kind of different core businesses that we need to maintain the flexibility for those businesses to meet their core consumers, whether that be somebody going to check out a book or do research in the library, or somebody needing to fuel their vehicle on a cross-county or cross-state trip.

You know, I would think -- I would urge some caution against applying a gas station model to EV charging. I think we are new enough into electric vehicle charging, but have enough data to suggest that that might not be completely applicable. We think people are largely going to seek to charge their vehicles where they are sat idle for a number of hours, so that's a lot of Level 2 charging, a lot of home charging. And so making sure that we not just take old fueling models and apply them to new and rapidly changing technology.

On the issue of -- I don't recall the commenter's name, but I do believe that somebody mentioned, you know, we need to take into consideration and standards that we look at kind, have a regional application. And I would -- from a hardware and software manufacturer's perspective, I

would broaden that out greatly. I think there is local issues, there is state issues, there is regional, there is national and there is international.

As hardware and software providers, we really do try and have one product that's applicable across as many different jurisdictions as possible. So I would caution against setting any standards that would be applicable only to Florida, and might be out of line with where other states currently are. That creates a burden on those providing services.

And then for any standards that the Commission looks at, I would encourage a very robust process. These are highly technical issues that have big implications on private sector industry, and understanding the pros, the cons, the challenges, the timelines is critical as the Commission considers those things.

So all in all, I think just back to the early comment, at this early stage in the market, ensure that we can continue to innovate and meet the needs of the customers.

Thank you.

MS. EICHLER: Thank you.

Drive Electric Florida.

MR. ALFORD: Matt Alford, Drive Electric Florida.

Not much to add to all of that. I think that there has been some really great feedback and input here, particularly from Justin at ChargePoint, right? It's okay that these aren't going to all work the same, right? And that will -- that will only kind of proliferate as you have different end use cases and deployment there. You know, you will have workplace charging, dwelling, fleet, right? So all of that is going to look different for different market segments, so that's okay.

And, you know, yes, I would -- I would caution the Commission not to try and pigeonhole, you know, sort of the existing paradigm of going to the gas station and applying that to EVSE charging. I think those are two fundamentally different types of fueling.

So with that, I will close.

MS. EICHLER: All right. And we are at EVgo now, I think.

MS. DUMIT: This is Carine again. I am sorry for the background noise.

Yeah, I think I would echo what Florida -- FPL

Duke, Drive Electric Florida and ChargePoint just mentioned. I will highlight a couple of things.

This certainly is a competitive space, and it is a space that is bringing in all this innovation. So at this stage, I think encouraging flexibility is important, and perhaps even going on some lessons learned from how the success of, or even the challenges other states have faced. I think that there is a lot of excellent information that could be brought forward in this proceeding that could even help further.

I think that it's important to maintain the flexibility of things -- it's a dynamic space. And I think -- I am forgetting who mentioned this, but I wanted to also echo the fact that charging, and particularly DC fast charging is a -- is a different model than the gas station model in the sense that it's not just a -- working from EVgo's perspective, we don't see charging as just a technology that is on highway corridors, but it's also important to make sure that there is that connection of the different types of business models, and then you see charging integrated into everyday activities. So accounting for that, and making sure that isn't sort of overseen is going to

be important.

So just -- (inaudible) -- that type of -- (inaudible) -- and technology the best model and allow for some flexibility -- (inaudible) -- thank you.

MS. EICHLER: Thank you.

Greenlots.

MR. COHEN: Hi. This is Josh with Greenlots.

And I appreciate the question, because I think there is a lot of agreement within the industry that the customer experience is really critical, particularly at this early stage of EV adoption. And from Greenlots' perspective, what that means is the driver, when they pull up to a public charging station, they should have a very consistent experience in terms of the process to validate with the network, in terms of what they expect, in terms of the pricing. We want to avoid any move to private in terms of the pricing, and -- and regardless of whether it's a highway corridor fast charger, or it could be a fast charger at a shopping center, it could even be a Level 2 station serving the public, the -- we want drivers to be able to pull up to these stations, if they are branded in a consistent way, and have this

consistent experience.

That's really where we see utilities as being uniquely well positioned to provide that experience, that consistency. Not saying utilities are the only ones who can provide that experience. I think if you look at some of the priority owner/operators, they really try and provide a consistent experience from state to state for their customers.

And I think, particularly in the context of a commission proceeding, particularly that is considering public charging, perhaps, in a variety of new spaces, utilities are really well positioned to provide that experience for several reasons. One is they have the sophistication and the technical knowhow often a lot more than an average site host, for instance, about the hardware, about the network capabilities, about these interoperability questions that we are talking about, they have the sophistication to manage the impact on the back end on the grid, and they also have the potential through the value of the wholesale level procurement to really provide bulk purchase, apply downward pressure on those purchases, and provide a consistent experience at

scale within their service territory.

So I think the question is right on. It is a legitimate issue, and again, we see -- we encourage the Commission to leverage the utilities to help with that.

Thanks.

MS. EICHLER: Thank you.

Tesla is next.

MR. BEAN: Thank you.

I think it's important to parse out the conversations and try to simplify it. So one, we shouldn't be too prescriptive in terms of standards, or what we think the customer experience should be. We should really be taking notes of what customers want and trying to innovate from there.

And in terms of kind of parsing it out, what could really benefit are streamlining, permitting and the actual interconnection, or getting power to a parking space? Just thinking of it in that regard.

Utilities have -- have a lot of experience, and are very good at deploying electrical infrastructure to connect service. And that's been a model that's worked for -- for decades. We

should continue to try to stream like that process so that charging infrastructure can grow and meet growing customer needs, and doing is in a non-discriminatory fashion, so regardless of what type of charging station or customer would be deployed at that location, everyone gets a fair shake of getting power there.

The other way to think about the conversation is the competitive marketplace versus charging stations that may be funded via ratepayer funds or state funds.

From Tesla's perspective, we should avoid any prescriptive requirements and let -- basically let -- let whoever is investing in the charging infrastructure decide the type of equipment and customer experience that they want to provide. That means if it's, we as Tesla, you know, we -- we don't have things like credit card readers on our charging stations because we don't feel like we need it because the customer can input their credit card information within the car, and that is the way to save costs on -- on the site side. But if a utility or state wants to fund charging stations, you know, they can adopt different standards to best fit the needs of what they are trying to

provide.

So I would say is try to think through it as kind of streamlining the permitting electrical service request, and then thinking out pathways for ratepayer and state funded charging equipment, and letting innovation continue in the competitive marketplace, and whoever is investing in infrastructure decide what -- what equipment and strategies they would employ to best fit the needs of their business model.

Thank you.

MS. EICHLER: Thank you.

Sierra Club.

MR. SHOAFF: Yes. Thank you. This is Nathaniel Shoaff for Sierra Club.

I agree with the comment from Tesla just now about making the distinction between the user experience where you have, say, a Tesla charging network versus something that's funded by utility customer dollars. And so in terms of the user experience, I think visually, Sierra Club doesn't really have a preference for what these look like. I think the more important piece from the user experience is that they -- that drivers have access to the charging station.

And so in thinking about that user experience, the concept of having open access is critical where there are utility customer dollars involved so that at least where those customers are partially or fully funding the charging infrastructure, Sierra Club's view is that the Commission should ensure that open access exists there, basically, so that you could use a credit card at any of these stations, and that membership to any certain network wouldn't be required for access, at least where that access is funded by utility dollars.

Thank you.

MS. EICHLER: Thank you.

SACE.

MR. CROSS: Thank you. This is Stan from SACE.

I agree with comments that have been made. The only things I would add is regarding using the gas station model, thinking about that in another way. You know, gas stations are a placed where they are placed because they are highly explosive and they are environmentally degrading, so they are typically pushed away from town out towards the highways. And though we recognize fast charging needs to be happening along highway corridors as

well, there is an opportunity for EV charging stations to bring business into Florida's commercial downtown districts, and therefore, making sure there is flexibility so that, from the site host perspective, if it's a local community, that their brand and field can be put onto that charging structure so that it matches kind of the economic development efforts that that downtown commercial district may be engaged in.

As far as thinking about ratepayer and taxpayer funded charging systems, and thinking about standards across them, you know, one, you know, significant, you know, user experience issue is the uptime of charging stations, and being able to rely as a driver, which I am, of an electric vehicle that the charging sedation is going to be available when you get there. So making sure that there is a standard expectation of uptime across all ratepayer and taxpayer funded charging stations, as well as making sure that there is data transparency with ratepayer and taxpayer funded charging stations, so that what is being learned at those charging stations, the data can be appropriately shared with the utility, or with state agencies, or whoever may be overseeing the

funding of those charging stations, so that the learnings from that data can be applied to the market at large, and not just learnings for the sort of, you know, the network service provider would be really important in making sure that we all learn through this early investment opportunity.

That's all. Thank you.

MS. EICHLER: Okay. Thank you.

I think that's everyone that we go around to, and so I will move on to the next question. And again, feel free to pass or state you agree with a prior respondent.

Okay. The second question is we are interested to know are there -- a popular suggestion was the make-ready style partnership for developing EV charging station infrastructure, and we just want to real quickly see if anyone has anything they would like to offer as a drawback to that so that we have more information on that.

And we will start with the City of Tallahassee.

MR. COWART: Yes. This is Ben Cowart.

Could you clarify again what you are asking for?

MS. EICHLER: Yes. We just want to know in the opinion of the participants here today, are there any drawbacks to the make-ready style partnerships for developing EV charging stations?

We got a lot of pros in our responses, and we just wanted an opportunity to receive any of the cons, basically, for that style.

MR. COWART: Okay. The City offers no comment -- yeah, we offer no comment on that. We are neutral.

MS. EICHLER: All righty. Next Duke Energy.

MR. REYNOLDS: Yes. Thank you.

I think in terms of drawbacks to the make-ready approach, we would -- we would point out the risk of stranded assets. Our program that we are installing right now is utility owned and operated, and the reason for that is to ensure that the assets that are -- that are funded under the program are operated for the full useful life of the assets. And in a make-ready structure, there is really -- once the chargers are installed, there is very little recourse on the part of the utility to ensure that those chargers are operated reliably for the full life of the asset.

Thank you.

MS. EICHLER: Thank you.

Florida Power & Light and Gulf.

MS. DVARECKAS: Yes. So Florida Power & Light and Gulf, you know, support the growth and adoption of EVs in the state, and to do so, we would propose and design an EV pilot that supports the adoption of EVs by removing barriers to adoption.

The EV pilots that we are currently enacting are meant to enable data collection to inform our approach to support and advance the EV market going forward. I think it's still too early to tell within our pilot program what the pest model will be for the utility. Overall, I think that in looking across the market, it will need to be a mix of business models, so make-ready may be one of them.

I would echo Duke's comment on stranded assets, and the fact that make-ready addresses just one cost component, and does not ensure the reliability for the customer experience.

I think the other kind of drawback that I would like to highlight that is that make-ready is ratepayer funded. And, you know, as the utility, we would like to retain the opportunity to be involved with what is happening with those funds to

ensure that they are deployed in a way that protects our customers, and is a good use of that investment. And I think that is where, again, the reliability and stranded assets comes into play as a consideration.

Thank you.

MS. EICHLER: Thank you.

JEA.

MR. LEIGH: Yes. As you heard from the other utilities, this is an evolving concept, and we don't have any further comments at this time.

MS. EICHLER: Thank you.

OUC.

MR. WESTLAKE: I have no comments on this.

I do -- would like to clarify my previous comment, because obviously I did an awful job of describing what I was trying to suggest.

We do not suggest a gas model approach to -- to stations, but we need to make sure that we do not ignore the fact that if you are an EV driver and have a specific charging type, you must be able to charge that when you get there.

As a five-year EV driver, I know the frustration of getting to a station and not having the right app, or the right charging mechanism.

So that's our full assessment for the last one, but thank you.

MS. EICHLER: All right. Thank you.

OUC.

MR. WESTLAKE: That was OUC.

MS. EICHLER: Oh, I am sorry.

Tampa Electric Company.

MR. HERNANDEZ: Yes, Kenneth Hernandez with Tampa Electric.

I would echo some of the comments that we heard from both Duke and FPL. While Tampa Electric recognizes that there is a variety of opportunities business models for utilities to potentially leverage and participating in the market, we don't -- we don't have any specific information as far as cons or negatives with regard to make-ready.

MS. EICHLER: Thank you.

Advanced Energy Economy.

MR. GARCIA: Thank you. This is Noah Garcia.

We will submit that the make-ready model is certainly valuable and useful for meeting certain customer needs and aligning with the business model of some EV charging providers, particularly in cases when site hosts aren't -- or are not more comfortable in owning their own charging

infrastructure.

We -- we also want to say that the utility owned and operated model may also be valuable in cases where EV charging is harder to deploy, or there might be split intent as in terms of ownership. So we ask the Commission to consider both of those models, and just want to point out that the Commission has already approved a utility and EV charging infrastructure program that allows for utility ownership as well.

Thank you.

MS. EICHLER: Thank you.

Alliance for Transportation Electrification.

MR. JONES: Yeah. This is Phil Jones again.

I associate my remarks with Jill at FPL and with Noah of AEE. I think the make-ready model is a very good one. It's been used in a lot of states like New York and California, but we -- it does have some limitations, what some of the people have said, from challenging use cases, like multi-family dwellings, low income -- (inaudible) -- communities, maybe some of the rural areas. So that's one possible limitation. You have to look at it on a case-by-case.

And then the data. The utilities need full

access to the data from the charging providers and manage charging, and load profile data, dwell time, all of that. Sometimes that is not easy to get.

So we encourage the utility to not have their hands tied, and to be able to -- to develop the market, develop a model that makes use for that use case. It's very use case specific.

That's it. Thanks.

MS. EICHLER: Thank you.

ChargePoint.

MR. WILSON: Yeah. Thank you for the question.

I think as you noted, the -- (inaudible) -- proposal provides -- or has garnered a lot of support in the comments, and we see that in this instance as well as across the country.

You know, I think it's important to note that there is a couple of different ways to do make-ready. We've seen some variation on it across the U.S., and finding the model that is right for Florida will take a little bit of work. But I think there are ways that any concerns the make-ready approach can be addressed.

I would note that I think one piece on the make-ready approach it is kind of inextricably

linked to some of the other questions that the Commission and staff have asked in this docket. It's a way to level the playing field in a competitively neutral way for independent site host and charging providers. And so I think it's important to think of it, one, as a program that can help expedite the installation of charging equipment, but also a program that helps meet the standards of competitive neutrality that the Legislature has asked the Commission to look into.

So I appreciate all the comments, and just want to make the connection between some of the issues later on agenda.

Thank you.

MS. EICHLER: Thank you.

Drive Electric Florida.

MR. ALFORD: Yes. Matt Alford, Drive Electric Florida.

Just I was, like, nodding my head with everything that Justin was just saying, right? You know, it's -- you know, we are going to need to use a range of policy instruments. Make-ready was positively mentioned by most folks, right, because in some instances, the distribution system may need upgrades, particularly for site hosts that don't

want to go to the utility ownership route. It's also going to be more and more important as we look at different end use cases and different market segments in choosing price parity, right. If you want to have suite charging infrastructure solutions deployed, it's very likely that you might need to do some distribution upgrades.

So, you know, accordingly, right, so Drive Electric Florida believes that a multipronged approach that leverages a range of business models and approaches to deploy an owned and operate EVSE is probably the most credible and assured means to participate in the electric vehicle market, and, you know, make-ready is going to be an essential component, particularly as you see loads increase.

And that's it.

MS. EICHLER: Thank you.

EVgo. EVgo, are you on mute?

Okay, I guess we will move to Greenlots.

MR. COHEN: This is Josh from Greenlots.

I would offer two overall points response when it comes to make-ready. One is that from the cost recovery standpoint, and future proofing, right, where, in some cases, the installation costs, including the make-ready, can be a large chunk of

the total cost, if not more than the chargers themselves, and the value of building in future capacity. When it comes to cost recovery and thinking about what constitutes used an useful, there is just a lot of value to having a site host, a utility, whomever, when they are doing the make-ready, to plan ahead and to build in the capacity for future charging station -- (inaudible) -- two fast chargers right now. So just for the Commission's consideration, thinking about how to do that, I think will be a good conversation that's worth having.

The second point is that a range of business models and investment approaches for utilities is absolutely necessary, particularly at this stage of adoption. When it comes to the right -- the right approach, Greenlots thinks that make-ready should be the expected minimal standard for the utility, but it's not the ending point.

So whether it's make-ready, or rebate to customers, or utility ownership and operation, we think a whole range of investment approaches are appropriate and necessary. And part of it has to do with the unique challenges dealing with getting charging stations deployed in different customer

segments and use cases. So part of it is at the macro level as well. There is just not enough charging stations to support even current projections for EV adoption, let alone growing the market and supporting the goals of Senate Bill 7018 to encourage EV adoption.

And so the main point is it would -- it would be a step backwards to preclude other forms of incentives and investments such as rebates and utility ownership.

Thank you.

MS. EICHLER: Thank you.

Tesla.

MR. BEAN: Thank you.

Make-ready holds a lot of promise, I think primarily because it's essentially an extension of existing line extension policy in establishing service at a location, just extending that behind the meter, which is very straightforward. It can be scaled very quickly, which is great.

Potential downsides that we see are when that design of a make-ready program deviates from that kind of tried and true and straightforward process and starts becoming overly prescriptive with different processes. And again, that line

extension process, very straightforward, single point of contact, you can kind of roll it into that. And within that process there is -- you could take the structure of applying an allowance and revenue test to ensure that there are no stranded assets, that based on the projected usage of that site the customer may have to chip in depending on how -- how often that site will be used.

So I think just, yeah, it holds a lot of promise, but the devil is in the details and there is a risk that it could get a little prescriptive and lead to higher costs and longer timelines.

MS. EICHLER: All right. Thank you.

Sierra Club.

MR. SHOAFF: Yeah. Thank you.

I think it's clear that there is consensus on this call about there being multiple approaches for utility participation, and we echo that sentiment, that there -- the Commission shouldn't prescribe one model over another, as we described in our comments.

I think different approaches may work better for different use cases, particularly around, like, unit dwellings in low income communities where the

financial incentive to install and operate a charging station may not -- may not be there for, say, a landlord in a way we think that a utility ownership model, you may end up further in EV adoption quicker than with a make-ready design.

So we encourage the Commission not to prescribe any one specific model, but to ensure that there are different ways for utilities to participate in charge infrastructure.

Thank you.

MS. EICHLER: Thank you.

SACE.

MR. CROSS: This is Stan from SACE, and I just want to echo what Sierra Club just said as well as what Duke and FPL offered at the top of this question segment, and what the Alliance for Transportation Electrification and Greenlots added.

I think that it's real important to be considering the different use cases that you are applying this to and making sure that you are making, you know, most effective use of a ratepayer dollars. And that includes, you know, ensuring that the investment in make-ready lead to charging stations that remain operable for the life of those chargers, because if they do become stranded

assets, and there hasn't been a process put in place where the utility can have recourse, then that could become problematic and onerous on ratepayers.

Thank you.

MS. EICHLER: Thank you.

All right. That's everybody. So we will move on to the next question, and this will be the last question for this first portion of Section 2.

And the question is: Are there any current issues or difficulties present with the EV charging station permitting process in Florida?

And we will start with the City of Tallahassee.

MR. COWART: Yes, this is Ben Cowart.

We can't speak to the state of Florida, but within our permitting jurisdiction, we don't see any impediments to EV charging stations, siting or construction.

And that ends our comment.

MS. EICHLER: All right. Thank you.

Duke Energy Florida.

MR. REYNOLDS: Yes. From Duke Energy Florida, I think we would offer that there is some variability in permitting across the whole

jurisdictions that can create delays in installing charging stations, and being a new technology, we are seeing some localities apply somewhat onerous requirements or processes that -- that are not necessary, and so there is some streamlining that could happen, perhaps at the state level, to expedite EV charging installations.

That's it. Thank you.

MS. EICHLER: Okay. Thank you.

Okay. Florida Power & Light and Gulf.

MS. DVARECKAS: Yes. I would echo -- echo what he just said, which is, you know, as a new technology, there is variability in how different jurisdictions are applying permitting criteria, as well as just the layer of education that's needed that can limit the speed at which EV charging is going in. This is something that we have come across as part of our pilot program. I think that to the extent that permitting process can be streamlined, it would be helpful in accelerating the deployment of EV infrastructure.

Thank you.

MS. EICHLER: Thank you.

JEA.

MR. LEIGH: Yeah. There is -- there is no

obvious impediment of the current permitting process. There is opportunities to streamline it, and I think those will occur as the market continues to evolve and grow.

That's all my comments.

MS. EICHLER: Thank you.

OUC.

MR. WESTLAKE: Yes. We have experienced difficulties in the permitting process and also changing landscape as we are in the -- in the process of installing high speed chargers. And we have identified this as a pretty significant issue in the FCG, the Florida -- the Florida group that is looking at ways to adopt electric vehicles, is there a way that we can simplify it and put a common permitting process across the entire state.

Thank you.

MS. EICHLER: Thank you.

Tampa Electric.

MR. HERNANDEZ: Yes, Kenneth Hernandez with Tampa Electric.

We don't have anything additional to add to the comments already heard.

MS. EICHLER: Thank you.

Advanced Energy Economy.

MR. GARCIA: Yes. So the permitting processes are typically guided by local jurisdictions and are not squarely a Commission jurisdictional issue. However, we agree with Duke, that there could be additional action taken at the state level to ensure that permit streamlining is -- or actions to facilitate permit streamlining are taken by local jurisdictions across the state.

Thank you.

MS. EICHLER: Thank you.

Alliance for Transportation Electrification.

MR. JONES: Yeah, this is -- this is Phil for ATE again.

I would agree with Noah, who just spoke. This is mainly a local government issue, so I defer to the utilities and the people who have already spoken on this, unless there is more opportunity, however, what you can do at both the state and local government level.

So the opportunity to remove an impediment would be the required building code -- a change to the building code that would require EV ready parking -- EV ready like make-ready equipment in new building construction across the state. It's controversial, and it would require probably

legislative changes at the state level, and then filter down to the local government level, but that's taken place in Atlanta, Chicago and other states across the country, like Washington state.

Thanks.

MS. EICHLER: Thank you.

ChargePoint.

MR. WILSON: Nothing -- I don't have any information specific to Florida, but I would echo across the country, we do see the issues that Duke and FPL raised.

I would also offer a specific example of what I think a couple of entities have alluded to, which is, you know, a statewide process to guide local jurisdictions. In California there was a similar bill, AB-1236, which required an entity in California to develop a statewide guidebook through an open process to address EV permitting issues.

I would note that I don't think legislation would necessarily need to be required for a state to take action to develop a statewide guidebook to streamline EV permitting in local jurisdictions. I would note, however, that in California, that AB-1236 process did include a budget for education and outreach to those local jurisdictions, which we

believe was very helpful in getting that guidebook disseminated, and utilities -- or sorry -- local jurisdictions actually using a guidance there.

Thank you.

MS. EICHLER: Thank you.

Drive Electric Florida.

MR. ALFORD: Hi. Yes, Matt Alford, Drive Electric Florida.

Just a big ole checkmark next to what Phil said, you know, there are, you know, building codes, there are many other facets to this that involve local governments besides just permitting. You know, there is a variability across jurisdictions, but if we are going to have a central network of infrastructure, you are going to need to have some sort of policy mechanism to deploy that application suite.

I would encourage our stakeholders to work with the Florida League of Cities and the Florida Association of Counties to kind of come up with, you know, what we think is the best approach.

California did require local governments to develop a permitting process by a time certain. So -- so there are some national models out there that sort of respect the role for local

jurisdictions, and the role that they have to play in this. There is also, right, landuse, planning, zoning, all of those things can kind of, you know, highlight where you might have issues in advance of the permits being filed and inspected. So, you know, just, I think, Phil and Justin did a great job there.

And that's all I have got.

MS. EICHLER: Thank you.

EVgo. They may not be on the call any longer.

Greenlots.

MR. COHEN: Nothing further to add from Greenlots.

MS. EICHLER: Thank you.

Tesla.

MR. BEAN: Thanks.

I would agree that most of the things that come up are local -- local issues, so that statewide guidance could be helpful.

There is one area at the state in Florida Statute 366.94, Section (3)(a), there is -- it talks about designated charging or electric vehicle spaces. That can lead to some interpretation at a legal level that those stations are only for electric vehicles and, therefore, don't count

towards parking minimums. I think it's important as EV adoption increases that parking stalls are considered towards parking minimum requirements for properties, so that's one area to look at.

And then other points are guidance from the state on zoning. So sometimes these are due to staff stations, which would be a principle use. Planning boards tend to go through a longer process as opposed to these being considered an accessory use perhaps, say, a retail location, as well as how the equipment is viewed. Sometimes it's viewed by a local jurisdiction similar to a utility transformer, and local jurisdictions have restrictions as to where transformers can be located.

Thank you.

MS. EICHLER: Thank you.

Sierra Club.

MR. SHOAFF: Nothing further from Sierra Club on this point.

Thank you.

MS. EICHLER: Thank you.

SACE.

MR. CROSS: SACE would just like to reinforce what the Alliance for Transportation

Electrification said; otherwise, no further comments.

Thank you.

MS. EICHLER: All right. Thank you for all your responses.

The next section, we asked questions about in the data request had to do with what other states' strategies that maybe could be adopted or considered for the state of Florida. And we appreciate your responses. It was interesting to read about things such as the REV Connect program in New York, and the Maryland Zero Emission Vehicle Infrastructure Council in Maryland, and the Indiana Crossroads EV Corridor, and -- and we just want to state that we understand that not all plans operate the same from state to state. In essence, if the Florida Legislature was to adopt the exact framework from another state, we understand it may not be fully beneficial to Florida's regulatory framework and market when working toward increased EV charging station deployment.

With that being said, I do have just two questions I would like to ask. The first one being: Can you please identify, if any, obstacle unique to Florida, and it can be any aspect via

regulatory framework, EV market geography, et cetera, that are important to consider when the Commission is researching and exploring beneficial partnerships for EV charging station proliferation?

And we will start with the City of Tallahassee.

MR. COWART: Yes, Ben Cowart, City of Tallahassee.

We don't see any obstacles to identify.

Thank you.

MS. EICHLER: Thank you.

MR. COWART: That affect our service territory.

MS. EICHLER: Okay. Thank you.

Duke Energy.

MR. REYNOLDS: Yes. Lang Reynolds again for Duke Energy Florida.

I think in terms of the Florida specific considerations for expanding EV charging infrastructure, one of the -- one of the biggest considerations is the expansion of charging infrastructure on highway corridors and evacuation routes. Evacuation routes for hurricane evacuation is something that's fairly -- fairly specific to Florida. We see that in other states, but of

course, it's definitely top of mind for us every year in Florida.

So that -- as has been discussed in some of the previous questions, EV charging is not homogeneous block. There is a lot of different use cases. And I think the presence of, and the importance of ensuring that charging is available on evacuation routes does have some special considerations for developing the strategy for Florida.

That's it.

MS. EICHLER: Okay. Thank you.

Florida Power & Light and Gulf.

MS. DVARECKAS: Yes. So I think that based on the reference, it's been fairly well established that the EV charging infrastructure deployment from across the country demonstrates that utilities are well positioned to help build the infrastructure gap when they are authorized to make these strategic investments. I think the regulatory structure in Florida is, you know, unique in the sense that we are regulated utilities, and subject to oversight by the PSC. So I think our overall point would be to ensure that the Commission remain empowered to oversee transportation electrification

plans and how the utility plans to implement them.

And then as a second point, I would echo Duke's comments on Florida's geography being a unique consideration, particularly when it comes to evacuation, evacuation as well as return to Florida associated with hurricanes and damage. And I think that underscores, again, a unique role that the utility can play in ensuring that evacuation routes are adequately covered with reliable charging, as well as ensuring that they are providing redundancy.

So I think, you know, another consideration is that when we talk about how infrastructure is deployed, and talk about the number of chargers, it's very important that there be redundancy at each of the sites as if a customer pulled up to a site and a charger is down, it can exacerbate the range anxiety issue that we see within the market that is slowing deployment.

Thank you.

MS. EICHLER: Thank you.

JEA. JEA, are you on mute? All right. They may have dropped off.

OUC.

MR. WESTLAKE: Yes. We agree with the prior

comments. I would only add that as -- as disaster events are hopefully infrequent, that we consider more mobile solutions to handle evacuation routes versus stranded assets that may happen along the corridors. Some of the studies that we looked at are that people do not evacuate as much as we might think they do. They come inland.

So I would look at the potential of using mobile solutions that can be deployed where the hurricane is going, versus -- versus beefing up along the areas; but otherwise, we are in agreement with pretty much everything else.

MS. EICHLER: Thank you.

Tampa Electric.

MR. HERNANDEZ: Gentlemen, Kenneth Hernandez again with Tampa Electric.

So we would echo the comments that have been made as far as evacuation and travel corridors that highlight, like FPL mentioned, the need for access in return home scenarios for evacuees returning into the state. And also add the need for focus on rural installations, since we have a great portion of the state that -- where customers live in rural settings.

And that is all.

MS. EICHLER: Okay. Advanced Energy Economy.

MR. GARCIA: Thanks. We can't identify any Florida specific barriers at this time, but we certainly agree with what Duke and FPL said with respect to evacuation routes, and as well as keeping a strong Commission role, and retaining authority to review and approve transportation electrification plans that can meaningfully accelerate the adoption of EVs in the state.

We also just want to quickly add that Florida, of course, is home to many diverse and disadvantaged communities, and we also just want to make sure that any plans and investments that are put forward are intended to serve those areas, as well as other areas of the state.

Thank you.

MS. EICHLER: Thank you.

Alliance for Transportation Electrification.

MR. JONES: This is Phil again for ATE.

I don't think there is anything really unique about Florida in terms of the regulatory structure. I think it's adequate -- the regulatory toolbox that the Commission has is adequate to deal with these challenges.

In terms of hurricanes, of course, Florida has

hurricanes, but California, Oregon, Washington, have wildfires, too. So wildfire mitigation, just like planning for hurricane evacuations, is a huge issue.

So one thing that may be unique about Florida is that you have a chief resiliency officer serving in the Governor's Office. I had the chance to moderate a EV session with Secretary Palestine the other -- a couple of weeks ago, and there aren't too many states right now that have chief resiliency officers. So I think for the Commission, as this infrastructure is built out in Florida, there could be subject to some problems during hurricanes, as Jill of FPL said, or a mobile solution. You know, there are many solutions that are possible. And obviously, SB 7018 requires the interagency process.

Just keep that in mind, but I think it's really important for the state agencies to coordinate closely on these resiliency issues. You don't want to build too much redundant infrastructure, for obvious reasons, cost and other reasons, into the grid. And you want to make sure the third parties are building as well along with utilities. But this takes an enhanced level of

planning with your local government, as well as state government folks who deal with hurricanes and emergency response.

Thanks. That's it.

MS. EICHLER: Thank you.

ChargePoint.

MR. WILSON: I would just note that we generally agree with the comments that Phil with the Alliance for Transportation Electrification just made.

Thank you.

MS. EICHLER: Thank you.

Drive Electric Florida.

MR. ALFORD: Hi. Yes. Matt Alford, Drive Electric Florida.

I just want to at a very high level echo everyone's comments, and just point out the Commission has an important role to play in sort of establishing a collaborative statewide vision for EV charging and increasing EV adoption.

You know, there is some things that you can do on the standpoint of integrated resource planning and stand-alone transportation electrification plan, that has been an approach that other jurisdictions and markets have taken.

And there are also some things that we could do to send some clear market signals to our utilities, our local governments, key corporate accounts, right, in terms of setting goals,but achievable goals, right, from aspirational market signals that will generate some organic alignment amongst policy-makers and decision-makers.

So, you know, in terms of what other markets have done, they have also had state investments in this. So thinking about all of that holistically, right, like, each one of those action items is greater than the sum of its parts, and I would encourage the Commission to take a hard look at what -- (inaudible) -- in other markets.

MS. EICHLER: Thank you.

Greenlots.

MR. COHEN: Yeah. This is Josh again with Greenlots.

I would say in Florida specifically, there is both a challenge and an opportunity when it comes to the case of EV adoption. So the recent numbers I am looking at show that Florida is forth nationally in EV sales, which, of course, sounds good. But when you compare apples to apples on a per capita basis, Florida is 20th in EV sales per

capita. So there is a tremendous gap, but also a tremendous opportunity to help accelerate that adoption.

And fortunately, as we know, that many of Florida's utilities have already been expressing interest, some recently, some for several years now. And as several of us have mentioned, and Greenlots certainly believes strongly, utilities are uniquely positioned to help adoption, and to do so in an equitable and geographically balanced way, particularly, as Ken mentioned, in terms of the rural character of a lot of Florida. I mean, utilities are uniquely positioned to help do that.

So challenge and the lack of EV adoption are the, or I would say the slow pace of EV adoption, but an opportunity to help accelerate that.

MS. EICHLER: Thank you.

Tesla.

MR. BEAN: Thanks.

Yeah, I would echo everything that was said about emergency preparedness. Really, really important given the scale and frequency of those events.

I would also like to highlight uniqueness of Florida, as mentioned previously, a travel

destination for the holidays, as well as seasonal travelers. So potentially coordinating with Visit Florida to ensure that people, when they do want to visit Florida, they are taking their EV and they are confident to take their EV as opposed to bringing their gas car.

And then another uniqueness of Florida is the value of goods that are shipped via heavy duty vehicles. It is one of the largest states in that regard, so there is a great opportunity to electrify those types of fleets, so trying to think through the coordination and planning that has to happen to enable that.

Thanks.

MS. EICHLER: Thank you.

Sierra Club.

MR. SHOAFF: Thank you.

We would just like to echo the comments from Greenlots, so that the opportunity that the Commission has to help encourage utilities in the state to propose large-scale investment in EV charging infrastructure, given their access to customers, I think the trusted relationship between customers and the utilities, I think they are viewed rightly as a -- as a credible, dependable

source of information, and so are in a fantastic position to promote EV growth in the state.

Thank you.

MS. EICHLER: Thank you.

SACE.

MR. CROSS: Hello. This is Stan from SACE again.

And I would just add that, you know, with thinking about the unique characteristics of Florida, we've been talking about the need to he evacuate, which is real and present. I just want us to all imagine what would happen to, you know, the -- the market if all of our efforts did not lead to EV drivers being able to safely evacuate from a hurricane condition.

So that -- that has to be, you know, front and center in our minds, and utilities are uniquely positioned to help come up with solutions for that, since the need for evacuation is very different than the day-to-day need for charging infrastructure to support local ownership.

At the same time, you know, Florida has a tourism market, and as Southern Alliance for Clean Energy and Atlas Public Policy showed in our recently released report on economic development

opportunities in Florida, this is really a key place for Florida to be investing in transportation electrification.

Florida is the end of the road, and it has an opportunity to partner with other southeastern states to ensure, to Tesla's point, that folks are driving their EVs to Florida on vacation. And so making sure that along with thinking about how we evacuate from storms, we are also thinking about how we maximize that tourism economic development and opportunity, and how we are doing it in partnerships with our neighboring states to ensure corridor connectivity throughout the region.

Thank you.

MS. EICHLER: Thank you.

And the final question for this section is going to be kind of an opinion question, and it is: Do you believe legislative requirements are necessary, or do you believe the EV charging market will move to fill gaps on its own?

And we will start with the City of Tallahassee.

MR. COWART: The City believes legislative action is not necessary to market.

That ends my comment.

MS. EICHLER: Thank you.

Duke.

MR. REYNOLDS: Lang Reynolds from Duke Energy here.

It's a bit of a broad question. I guess we are -- we have been focused, as a utility, on what we can do to expand access to EV charging and support market growth through foundational infrastructure and education to our customers.

I would add that we have seen so Josh from Greenlots mentioned the market share in the Florida market right now for EVs, and it is behind what we are seeing in other states, and there are policy mechanisms that can be tied so some of those higher levels of adoption. So I think we probably need to know a little bit more about the specifics of this kind of a question, but again, we think that utilities are -- are well placed to support market growth and adoption of EVs and EV charging stations.

That's it for now.

MS. EICHLER: Okay. Thank you.

FPL and Gulf.

MS. DVARECKAS: Yes. So FPL and Gulf feel that the wide variety of strategies that have been

mentioned today demonstrate the diversity of approaches that have been successful elsewhere, as well as the current innovation that we see in the market, both across the utility players as well as, you know, other vendors in the market and participating in this call.

I would say that this highlights the importance of allowing the market to develop, and we would just like to underscore that we think a light touch regulation of this space is necessary. We believe the current regulatory structure is sufficient. Though, again, I would reiterate as I did in the last statement, that the PSC should be empowered to review and evaluate utility EV programs, tariffs and investments. We would like to see this being done on a case specific approach, instead of a broad legislative mandate.

With that in mind, we also want to highlight that the PSC review should acknowledge the potential -- the inclusion of EVSE and utility rate base will ensure investment. The general body of customers, and not only EV drivers stand to benefit from transportation electrification. And then the analysis of cost and benefits should be done on a system basis.

Overall, I think that we are supportive of any action that helps to grow this market and accelerate transportation electrification as we view it as beneficial both to EV drivers, to our customers, to the market, and as well as to the system as a whole.

Thank you.

MS. EICHLER: Thank you.

JEA.

MR. LEIGH: JEA does not foresee any legislative solution that would help at this time, but would certainly be open to considering and support legislation in the future.

Thank you.

MS. EICHLER: Thank you.

OUC.

MR. WESTLAKE: OUC agrees that the utilities are probably positioned best to encourage EV adoption in our respective territories, but we would be more concerned with policy that is more punitive in nature. So as an example, a gas tax replacement is seen -- could end up being seen as punitive if it was excessive. So we would be more concerned with that sort of negative piece.

Thank you.

MS. EICHLER: Thank you.

Tampa Electric.

MR. HERNANDEZ: This is Kenneth Hernandez again with Tampa Electric. And we would agree with the comments provided by Florida Power & Light.

Thank you.

MS. EICHLER: Thank you.

Advanced Energy Economy.

MR. GARCIA: Thanks. We generally agree with the comments made by Florida Power & Light, and just add that, as you can tell, there are many EV charging market players on this call that are installing charging infrastructure in the state of Florida to support the EV market, but we just want to add that utilities also have an important role to play, not only in accelerating this market, but doing so in a way that actually creates utility customer grid and broader societal benefits. And in that process, the PSC has an important role in ensuring that these plans and investments that are put forward by utilities do achieve those goals, and do so in a way that, again, is driving these broad benefits that electrification can promise and that we detailed further in our comments.

So I will just stop there and conclude.

MS. EICHLER: All right. Tampa -- Tampa Electric -- oh, no, we just did Advanced Energy Economy. Okay, Alliance for Transportation Electrification.

MR. JONES: Thank you. This is Phil with ATE again.

I would agree with the previous commenters, legislation is not necessary. The just and reasonable rate-making framework under Florida law and rules is adequate. We call it the regulatory toolbox. There are a lot of tools in the toolbox that the Commission can use, previously, obviously remains a principle that the Commission apply going forward. Just a couple of comments, though.

Planning is important. I think several commenters have talked about two new plans, and obviously SB 7018 is going to require a corridor charging plan, but we think it's important for the utility to do that. Sometimes states want to do a rollback for the entire state. That's been done in many states, or states have a voluntary roll of, let's say, 1.4 EVs by 2030 through an executive order. That's a possibility. That's not your call because that's another agency that would do that. But some sort of rollback over the 10- or 20-year

period sort of IRP or some sort of plan is important, and then the Commission could acknowledge that and deal with the specifics.

And the other thing, of course, is rate design. And stakeholder process rate design is going to be critical. The Commission has a lot of flexibility to deal with different types of rate designs.

And then the stakeholder process. What you are doing today with people on the phone, it's important to keep the stakeholder process going because this is going to be dynamic, not static. And to have some forum where Commissioners and staff can go back to the stakeholders and vet these issues is important because it's changing very rapidly.

That's it.

MS. EICHLER: Thank you.

ChargePoint.

MR. WILSON: I think the Legislature can offer some important policy guidance as well as look at -- important policy guidance to the PSC as well as look at strategies outside of the Public Service Commission purview to help expedite EV growth and EV charging infrastructure growth.

That said, I think at this current time, the Commission has the appropriate tools necessary taking into consideration the issues the Legislature has previously identified.

Thank you.

MS. EICHLER: Thank you.

Drive Electric Florida.

MR. ALFORD: Hi. Yes, Matt Alford, Drive Electric Florida.

You know, the Commission has an adequate set of regulatory tools at their disposal, you know, but we will see kind of, I guess, you know, what the outcomes are and what the, you know, industry and the stakeholders have an appetite to do.

Most other states have seen some combination of legislative, executive and regulatory action to move forward. And again, right, just to echo Justin, the Legislature can offer some important policy guidance to the PSC, as well as look at some strategies outside of what's within your regulatory purview.

I think the single most important thing to increase investments, you know, in transportation electrification and EVSE is to provide some regulatory and statutory certainty to the market

participants, so I would close with that.

MS. EICHLER: Thank you.

Greenlots.

MR. COHEN: Let me offer a few thoughts on this, and one is to echo what Matt just said, that states that are seeing good EV adoption leverage not only legislation, but also executive action and Commission action, and so a diverse approach is needed.

I think, specifically in terms of any legislation, that would be helpful. And going back to Senate Bill 7018, which does invite the Commission, FDOT and Office of Energy to, you know, suggest things, including potential legislation, I would offer a few high level recommendations to think about.

One is just at a foundational level. Setting a target for EV adoption is probably one of the most basic and impactful things that states can do. And then when you break it down further into different vehicle classes, whether it's light duty vehicles or also medium and heavy duty vehicles, as most folks on this call know, 15 states and the District of Columbia, not legislatively, but the executive action signed onto a multistate

memorandum that called for increasing levels of electric medium and heavy duty sales within their states with a specific deadline for that.

So there is different -- different forms that these targets can look like, but without being too prescriptive, I would say if the Florida Legislature says, hey, here's where we want to be as a state in terms of EV adoption, that would be a huge step to move forward. And again, not just the different vehicle classes, but also targeting use cases, like ports, for instance, and non-road equipment. I mean, there is a whole range of action.

So in terms of any recommendations that may come out of this process to the Legislature, I think, you know, with a broad brush, things along those lines could be very impactful.

The corollary to that is that, as Phil mentioned, the Commission already, today, has the full regulatory toolbox to move forward in the context of utility filings. And, you know, Senate Bill 7018 again gives that to the Commission to -- I mean, more so than it already has in terms of setting as state policy the goal of encouraging EV use and adoption. Not just encouraging charging --

hurricane corridor charging, but also encouraging short-range and long-range adoption.

So there should be no question that the Commission needs further, you know, authority. The Commission already has full authority to move forward whether it's through transportation electrification planning, or whether it's through specific utility filings.

And then the third piece has to do with the language in Senate Bill 7018 about considering the appropriate role for utility participation in a competitive and neutral manner. I think that's important language. And when it comes to the appropriate role of electric utilities, of private network owner/operators, of third-party suppliers, of site hosts, I think it's important to view all of those as important actors in the marketplace.

So from a Commission standpoint, Greenlots would encourage the Commission to try and be thoughtful about avoiding tilting the market, either in favor of a particular business model or away from other business models, and really take a range of investment approaches and support that.

Thank you.

MS. EICHLER: Thank you.

Tesla.

MR. BEAN: Thank you.

We do not believe that legislative action is needed at this time. Although, I will highlight something we said in our comments about sales tax treatment of electricity that is going to charging station and then being taxed on the utility bill and then being assessed a tax when a customer charges their vehicle. That may be something that the Legislature has to weigh in on eventually, but I am not sure about that right now.

Thanks.

MS. EICHLER: Thank you.

Sierra Club.

MR. SHOAFF: Yeah, thanks. This is Nathaniel again.

Part of the question that you posed to all of us was is legislation necessary or is the market going to fill the gap on its own?

In Sierra Club's view, the answer is, yes. The market is going to fill the gap, but I think it's important to keep in mind that, like Noah from AEE said, the Commission has an important role in ensuring that these benefits of transportation electrification are achieved, and that they are

achieved quickly, and that the benefits of electrification reach all parts of the state. That could be people who live in rural areas. It could be low income communities. It could be communities of color. I think those -- these sorts of questions are ones that the Commission should keep in mind, is that it has the ability -- the utilities have the ability to ensure that these benefits actually reach the population in Florida, and reach it at scale, and reach it more quickly than otherwise would have if the state doesn't ask. So we encourage the Commission to take on the responsibility to help meet those challenges so that these benefits flow and flow quickly.

Thank you.

MS. EICHLER: Thank you.

SACE.

MR. CROSS: This is Stan Cross from SACE.

And I will just echo what Greenlots and Sierra Club mentioned, and just put a little more weight on the value that the Legislature or executive action can play in setting a goal for the state.

Right now, Florida has a very unique opportunity in Senate Bill 7018 bringing together multiple agencies to look at this issue. And what

we see nationwide is that states that have used an effective blend of executive action, legislative action and regulatory utility action and engagement is what -- (inaudible) -- the market is strongest.

Though we agree with what Alliance for Transportation Electrification and others have said, that the Commission has the tools that it needs in its toolbox, we also advocate that the State of Florida to look at expanding that toolbox and setting goals for light duty adoption, but also setting goals for state fleet light duty adoption, as well as transit and school bus adoption, as examples, would help drive our actions towards a goal instead of driving actions towards a -- (inaudible) -- market forecast, the goal will root, you know, the sort of question of whether or not the action should be taken and something that we can measure progress towards.

Thank you.

MS. EICHLER: Thank you.

That is all the questions that I had for Section 2. I appreciate everyone participating and sharing all of the valuable ideas. It gives us a lot to think about as we work through carrying out the requirements of Bill 7018. And I am going to

throw it back to Ben Crawford for the next section.

MS. CRAWFORD: Thank you, Shelby, and all of our commenters who took part in the discussion.

Unless somebody who hasn't weighed in yet has something further to add, we will move on to the third topic. All right, move on to the final topic for discussion.

The final set of responsibilities that Senate Bill 7018 directed us to fulfill was identifying regulatory structures necessary for the delivery of electricity charging stations. Was is one of most important and complex topics we are hoping to hear from stakeholders on and the comments gave us a wide range of options to work with. Asking questions on the final topic will be Dale Eastman.

Dale. Dale, are you available on the phone or do you have your phone muted?

MR. EASTMAN: Oh, sorry, this is Dale -- (inaudible) -- so I just got in.

Ben, am I all set for -- to go?

MR. CRAWFORD: Yeah, Dale, go ahead -- go ahead with your question.

MR. EASTMAN: Okay. I am sorry about that, guys. Like I said, my assistant -- (inaudible) -- as soon as Shelby ends. Timing is everything,

right?

So this section is going to be concerning the regulatory structure necessary for delivery of electricity to EV charging station infrastructure.

Staff found that many respondents felt that current regulatory structures governing the delivery of electricity to EV infrastructure are not a barrier to the expansion of EV charging infrastructure in Florida. Public utilities have a wide variety of options to participate in the EV charging market, and have begun to explore those options.

Time of use and dynamic rates may be used for certain cases but may not be appropriate and cost-effective for all use cases. The overall goal of rate design should be to move the EV charging load to off-peak periods through rates, technology and changing consumer behavior.

Another rate structure option is to establish and maintain a fair fee structure for electric vehicles, which may be road usage charges, mileage-based user fees or other mechanisms.

One other option is to allow utilities to recover make-ready where stand-alone economics may not support a direct economic business case, public

chargers that reduce range anxiety and low income areas of their service territory that may not readily justify the infrastructure expense.

Comments that were submitted to PSC Staff on what constituted competitively neutral policies were mostly in agreement from the respondents. The idea that a general mix between allowing utilities to play a role, as well as having private industry/site host take the lead on the innovation of charging hardware, software and pricing will have the best outcome.

Respondents mostly agree that competitively neutral policies are those policies which allow for participation in the market by all parties, including electric utilities, in a manner that does not favor one participant over another. A competitively neutral approach should neither prohibit utility investment and ownership of charging stations, nor private party investment and ownership of charging stations.

It is important to ensure that all stakeholders involved in the deployment, ownership and operation of EV charging equipment are on as equal of a playing field as possible. To the extent utilities are authorized to own charging

stations, guidelines should be adopted to ensure they are subject to the same line extension policies and procedures, rate design, and are not provided with preferential treatment to non-utility charging operators.

On the participation of public utilities in the electric market -- marketplace, excuse me -- staff found that utilities have roughly four levels of possible engagement in the market: Site host owned and operated, third-party owned and operated, site host owned but third-party operated, and utility owned and operated.

Most respondents expressed the preference of flexibility for all parties as being a high value moving forward. Additionally, as electric vehicle adoption grows, utilities will need to incorporate this growth into their long-range infrastructure plans.

One area where consensus exists on this topic is on make-ready, where utilities invest in a conduit and other electrical infrastructure leading up to the charger. The result leverages utilities' strengths in infrastructure build-out with the scale, learning and efficiencies that private developers have built over thousands of installs

and hundreds of thousands of customers. Make-ready should also avoids potential issues with ownership such as the monopoly entity's ability to set its public pricing at rates too low for the private market to compete, which may hinder competition.

So what I am going to do is go I am going to break this up by topic. For the first segment, I'm going to focus my questions on the regulatory structure necessary for delivery of electricity to EV charging station infrastructure. So for this line of questioning, I am going to direct this towards private -- private charging industry.

In your eyes what kind of rate structure should IOUs have? Time of use, realtime pricing, or something else?

And we will start with ChargePoint.

MR. WILSON: Thanks, Dale.

And just a clarifying question. I believe what you are asking is what rate -- what type of rate structure should utilities charge the customer of record, or perhaps the site host that is providing the EV charging service; is that correct?

MR. EASTMAN: Correct.

MR. WILSON: Okay. Wonderful.

So I think broadly that ChargePoint believes

that there is a couple of different ways to look at this. I think fundamentally it's important to realize that, in many applications, EV charging is a very low utilization type customer, in particular EV fast charging, but also to some extent, fleet charging and public Level 2 charging as well.

And so while we think that time of use rates have a very important role to play in helping provide price signals of, you know, when the most optimal use of the grid might be, we also believe that low load factor rates which we've seen in many other states for specific use cases as perhaps being applicable here. And so examples of that are agri -- irrigation and agricultural rates, special rates for ball fields, at houses of worship, all which have relatively low utilization, low load factors as being a way to ensure the site host can equally participate in the market.

That's not -- those are not the only rates. I think there is a variety of rates that have been instituted across the U.S., and are being considered across the U.S., and each of them should be evaluated independently and with that unique utility's characteristics in mind.

Thank you.

MR. EASTMAN: EVgo. EVgo, are you on mute still, or still don't have you?

MR. CRAWFORD: I think we may have lost EVgo.

MR. EASTMAN: Yeah, I think so.

Okay, Greenlots.

MR. COHEN: Yeah, this is Josh from Greenlots.

So in terms of the appropriate regulatory structure and rate structure, let me just kind of zoom out for a bit and just offer the big picture context, which is that EV charging has the potential to offer significant benefits to the grid and ratepayers by selling a larger volume of kilowatt hours of electricity that allows the utilities to either use to spread out their system costs across a greater sale of electricity, but the key is to optimize that off-peak charging is desirable.

So as a general principle, Greenlots believes that the value of EV charging is best unlocked when the price of electricity aligns with the cost of electricity at that time.

So rate design is important. We see time of use rates as an often appropriate first step to help incentivize customer charging behavior and shift some of that load; but we see rate design as

just a first step. And it's -- in some ways, it's signed of a blunt instrument that doesn't offer really granular variation in pricing, and it often requires active customer awareness and participation. It's more passive from the utility standpoint.

So Greenlots really sees leveraging software as the secret to really unlock the value that EV charging has to offer for the grid, and for all ratepayers. And without doing a deep-dive into it, just the ability to offer dynamic realtime load management through price signals, is just -- is just very powerful, and in many ways can complement and amplify rate design and timing constraints.

Thank you.

MR. EASTMAN: Great.

And Tesla.

MR. BEAN: Thanks.

Yeah, I don't think we can really prescribe whether dynamic or time of use rates are better, but just more importantly, that customers are getting more precise price signals about conditions on the grid, and that those signals are actionable. So primarily, that's time of use rates, or even moving towards away from a non-coincident demand

charge to more of a more coincident demand charge with discrete time periods in which it's measured.

But time of use rates can be very -- are a good signal so that charging operators can better manage their systems and their costs, and are incentivized to reduce their costs and to then send signals to the end use drivers.

And then in terms of dynamic rates, you know, tend -- those dynamic rates tend to really just reflect the fuel or the generation component, and that's -- that's fine, but we do also have to deal with the capacity components. So there could be a blends of different bill structures or rate design structures.

And then in terms of actionable with time of use rates. What I mean with that is avoiding, say, a 12-hour beak period, because that really doesn't give an operator or a customer much of an opportunity to avoid that peak.

And then it's obviously important to ensure that costs are recovered. So what we have looked at are -- with some utilities are what is the cost to serve this site and making sure that we are contributing to the commercial class average.

So in our comments, we pointed out a realtime

price rate design that Georgia Power offers that ends up getting the effective price for charging stations closer to the commercial class average while ensuring that cost, full cost of serving that site are recovered. And that's go been really beneficial to investment in Georgia.

So I will leave it at that. Thank you.

MR. EASTMAN: Okay. Great.

And I am actually going to ask the utilities to provide comments and thoughts on what was just stated by the private charging industry.

So I will start with the City of Tallahassee. City of Tallahassee, are you on mute?

MR. COWART: Yes. I am sorry about that. Ben Cowart, City of Tallahassee.

We think that as EV adoption increases among our customer base, that rate design will have to be considered, and probably a time of use or some kind of maybe innovative flat fee charging fee, because there is the issue of how do you segregate EV charging from the rest of the customer's load? Is that is a second meter dedicated to EV charging? Do you have analytical software that can recognize when an EV is charging, and how does that happen? So there is other implications that have to go

along with, you know, other things to be considered with the rate design.

That ends my comment.

MR. EASTMAN: Okay. Great.

Duke Energy.

MR. REYNOLDS: Yes. This is Lang Reynolds for Duke Energy Florida.

As far as -- so rate design and these rate structures that you specifically asked about, it's a pretty complicated question. I have heard a few different things from the vendors here today. I think it's important to step back and probably first set the stage a little bit with what -- what we would be trying to accomplish. What are the goals? And also understand that these different segments have -- have different use cases, and what is appropriate for residential customers is probably -- or could be different than what's appropriate for C&I customers that deploy Level 2 versus DC fast charging.

So there is a pretty broad spectrum of possibilities here, and it's also important to understand what we are trying to accomplish with these different price signals. So are we trying to encourage EV adoption? That's one question. Are

we trying to shape and manage load? That could be another question.

So I think it's really a pretty complex question that's difficult to answer in just one way or the other in a short period of time. But one thing that I would add is that looking at the data that we have on our customers who -- who do operate charging stations, we -- we think we have a pretty -- a pretty good selection of existing rates, so we haven't -- nobody has demonstrated that EV charging is facing onerous costs on the commercial/industrial side right now with our existing rates. We also have existing time of use rates across the spectrum, and also C&I rates that don't feature a demand charge.

So I think that this question is really a pretty broad question, and I think it does depend on the specific segments, and specific utilities even, when it comes to what -- what's being offered and what the goal of changing the current offers would be.

That's it.

MR. EASTMAN: Thank you.

FPL and Gulf.

MS. DVARECKAS: Yes. I would echo Duke's

comments on needing more clarification on the objectives of a time of use rate. For example, FPL currently has three pilot tariffs submitted to the Commission for consideration. And two of those, which we kind of refer to as demand limiter tariffs are intended to help address the economic challenges that demand charges cause for operators of low utilization fast charge stations. In designing those tariffs, we considered various rate designs proposed within the -- within the industry, you know, looking at eliminating demand rates, discounting, replacing them with volumetric rates, time of use rates, fixed subscription charges. Ultimately, in terms of those that we put forward, we chose the demand limiter mechanism because it provided rate relief for low utilization stations that need it most, and then revert it back for others.

I understand that that docket is not up for discussion today, but just showing how, for a specific issue, there was many considerations that went into what the right rate mechanism was.

With regard to time of use rate specifically, I would say, you know, at this stage notice EV market development process, we didn't feel that

they were ideally suited at this time; however, as EV penetration increases and drivers become more educated, we do think that managing the impact of EVs on the grid in a way that facilitates a more efficient use of the grid will become more critical. So, therefore, you know, FPL is not opposed to evaluating these types of time varying rates on customer behavior in future studies or tariffs, so I would continue to emphasize that more consideration and discussion is needed about the specific goals, and the best way to achieve that.

Thank you.

MR. EASTMAN: Great.

JEA, if they are still with us.

MR. LEIGH: Yes. JEA believes that regardless of the end use, the most equitable rates result when costs are allocated to the end use in proportion to the cost of providing the service. That being said, JEA recognizes that there is continuum of rates that can be used for EV charging, with one extreme, probably the most equitable being realtime pricing, and probably the least equitable but easiest to administer is just a fixed rate based on generalizations about end use.

With that being said, there are constraints to

more equitable pricing techniques, including the ability to measure the service and communicate in a dynamic fashion the price of a service to a customer.

So JEA believes and -- and -- and will adopt, consistent with cost-effectiveness pricing, techniques that accomplish and result in more equity as time goes on and metering technologies evolve.

Thank you.

MR. EASTMAN: Thank you.

OUC.

MR. WESTLAKE: Pete Westlake with OUC.

If we separate out home base charging from commercial and high speed charging, home base we feel is best served by a time of use rate and -- and getting that rate in there now so that we can begin to form habits for people who are purchasing vehicles is -- is pretty important.

The high speed charging, where you have got very extensive equipment that is -- is serving a high demand and low -- and a low -- a low peak is -- is really complicated and will take a different form -- it will take a different way to solve that problem, because we need to look at the

aggregated value of an electric vehicle versus that single event which is causing demand at the high speed charging, because 20 percent -- that only represents 20 percent of the charging that's happening with the vehicle. So I think it's going to require some very creative rate based processing to be able to solve this problem.

Thanks.

MR. EASTMAN: Thank you.

Who's next? TECO.

MR. HERNANDEZ: Yes, Kenneth Hernandez again with Tampa Electric. And we would agree with the comments already provided by Duke and FPL.

Thank you.

MR. EASTMAN: Okay. Thank you.

I am going to pose -- or I am going to ask the interest groups to -- to weigh their thoughts in on this as well. So let's start with Advanced Energy Economy.

MR. GARCIA: Sure. We will just quickly add that we agree with Greenlots' view, that rate design is important for driving and bringing sort of the benefits of EVs through managed charging, and potentially putting downward pressure on utility rates for all customers.

And also agree that time of use rates potentially a good start long dwell time locations for charging, typically home and workplace, where you are able to see shift in demand. But there is also potential, as Greenlots noted, for more active software enabled load management that could provide a more sophisticated solution as EV adoption scales to further complement time of use rates moving forward.

I also just want to note that while TOU is probably a good start for many of these longer dwell time locations, it may not work or be best fit for all segments, and I am thinking specifically of DC fast charging, where customers are using those stations to receive a quick charge, and they might not necessarily be price sensitive given the time that they are -- they are charging. So other rate design solutions, including those that potentially better align cost with -- I am sorry, better align prices with cost causation principles and potentially limit demand charges, or better aligned EV charging with those low load factor rates could be -- could be a potential solution for DCSC.

So all this to say, while we should be looking

for ways to do load management for use cases that are easily able to shift their loads, it's okay that, and not in all cases we are able to do that, and the Commission should be flexible in approaching rate design in a way that that takes into account the use cases that we are seeing in the EV charging the system -- or EV charging system.

Thanks.

MR. EASTMAN: Thank you.

Alliance for Transportation Electrification.

MR. JONES: Yeah, this is Phil for ATE.

So just a couple of comments. First, should be no bias or preference of outset about the type of market development model, as we heard in the previous segment, there is utility owned and operate, leasing with a the subscription rate. There is make-ready with a rebate. And so all of these have rate design implications. That's number one. Don't tie -- don't state the preference up front. The burden will still be on the utility obviously to justify rate design.

Second, cost causation principles still apply to bond rate principles. This is very complicated, and it's from what OUC said about public DSC trying

to get the rate right for -- for low utilization high demand, while not subsidizing or allowing too much transfer on the rate classes based on your cost of service study is going to be difficult.

So there is a variety of options. I would advise the Commission not to mandate dynamic rates or realtime rates, or anything, but let the utilities and vendors kind of -- (inaudible) -- in a case -- in a case specific. So I think I will end it there.

Thanks.

MR. EASTMAN: Okay. Thank you.

Who's up next? Drive Electric Florida.

MR. ALFORD: Hi, yes. Matt Alford, Drive Electric Florida.

I just want to echo most of the comments from -- from our members that have gone so far in avoiding open dockets. I think Drive Electric Florida has submitted comments that sort of address some of the questions that have been asked here, but one thing to point out is that Florida law currently states that the sale of electricity through EV charging station does not constitute the utility sale of electricity and, accordingly, should not be regulated by the Commission.

Charging station owners should be allowed to charge for electricity on a per kilowatt hour basis by duration of charging or another rate as they see fit.

And again, sort of outside of the EV specific or time of use sort of demand limiter facet of this question, public utilities should be encouraged to propose EV programs that include a range of investment approaches and target a range of different customer segments in end use cases. And some of those things might include customer education and outreach, investments and/or ownership of EV charging infrastructure and then rebates and incentives for customers. I think that there are a couple of really good examples out there nationally, particularly in Minnesota, Maryland, Colorado, where they have really kind of taken a portfolio approach to the regulatory structure for utilities.

And thank you.

MR. EASTMAN: Thank you.

Sierra Club.

MR. SHOAFF: Yep, I agree with the comments from Drive Electric Florida and AEE, that the -- the key here is that, you know, that there are lots

of available rate structures depending on the use case, and we don't think -- at least Sierra Club doesn't think the Commission prescribe one solution as a fix all for all use cases. We've cited a couple of different ways, for example, to structure time of use rates for residential charging in our comments. We also addressed three different solutions for demand charges other states have implemented with regard to EV fast charging, so we think that there is ample opportunities here for rate structures proposed by utilities that are investing in this EV charging space to find the right solutions, and to try different solutions and see what's best suited for that particular use case in Florida.

Thank you.

MR. EASTMAN: Thank you.

And finally, SACE.

MR. CROSS: This is Stan from SACE. And I agree with comments that have been made by Duke and FPL, as well as Alliance for Transportation Electrification, Sierra Club, Greenlots and Drive Electric Florida.

And the only -- the only thing I would add is just to encourage the Public Service Commission to,

as we discussed at the top of this conversation, keep front of mind that this is a nascent market, and that the answers will be forthcoming, and we will get better answers, and we will get them more quickly if we allow utilities to engage in pilots that test some of the theories.

And even though we can point to different rate design that has been implemented in other states, it's all relatively new, and the long-term implication is still unknown, particularly as we approach the hockey stick of growth that we have alluded to earlier, and how that might ultimately impact any particular rate design and -- and sort of the consequence to -- to ratepayers.

I think also keeping front of mind the broader grid benefits that may be available through transportation electrification, and how that can be maximized and optimized. And also recognize that in the regulated environment, utilities are providing electricity to EVs at all times, at the home as well as in public charging, and whether the ratio stays long-term, like it is now with approximately 80 percent of charging being done at home and the other 20 percent at workplace or in public, or whether that shifts as longer range,

mostly battery electric vehicles hit the market, you know, is yet to be seen. So also maintaining kind of flexibility in the thinking as far as what -- where we are going to ultimately wind up with this market and, hence, which rate designs are going to be most applicable.

Thank you.

MR. EASTMAN: Thank you.

And that's the end of that first question. Does anyone have anything they would like to interject?

MR. CRAWFORD: This is Ben. I want to take this opportunity -- court reporter, would you like a break?

(Brief recess.)

MR. CRAWFORD: All right. I've got 12:35. Dale, if you want to move on to your next question.

MR. EASTMAN: Okay. Great. And after actually talking with Cayce, I just actually have the rest of the Section B, which turns out to be one question.

So this is -- this question is going to focus on what constitutes competitively neutral policies in the electric vehicle charging marketplace, and this question is in regards to utilities versus

private charging industry charging stations.

And so I am going to focus this to both, and I am going to start with -- I am going to go down the list, starting with the City of Tallahassee but the question is: How are you planning to differentiate your charging stations from one another in order to attract customers? Or is this ability not really attainable?

City of Tallahassee.

MR. COWART: Yes, Ben Cowart, City of Tallahassee.

If I understand your question, it sounds like a marketing issue. Are you asking how -- how EV -- the person needing the charge would pick our station over another one, or how would they find it, or exactly what are you asking for there again?

MR. EASTMAN: Yeah. So pretty much if you look at it from a customer's point of view, if they are just looking for a charger and they don't have any taste or preferences for one over another, what are ways that your -- that your organization is looking to attract those customers?

MR. COWART: All right. So I think maybe OUC said it earlier, you know, well lit, a safe environment. You know, maybe even a marquee that

shows the equivalent cost of gasoline. So, you know, but most EV drivers will be savvy enough to know that; but just something that differentiates itself from a standard Circle K or Wawa, you know, that you can come here, charge, maybe it's designation charging the location, you can shop, watch a movie, you know, movie theater, but just anything we can do marketing-wise that draws attention to ourself.

And that's all I got.

MR. EASTMAN: Okay. Thank you.

Duke, any comments?

MR. KING: This is Peter King with Duke Energy. I don't think we have looked at it like that. I think we have looked at the deployment we've done and what we have got in the ground is really more of a means to spur adoption across the market, and there are a lot -- there are a lot of private independent market resources out there for drivers and others to identify where the stations are, and look at pricing and all those other things. Beyond that, like I said, our goal has been to get some visibility of the stations in general across the service territory to spur on more adoption.

That's all I have.

MR. EASTMAN: Okay. Thank you.

Florida Power & Light and Gulf.

MS. DVARECKAS: Yes, similar to what Peter said. To date, with FPL's pilot program, we have been focused on ensuring that we are helping to strive adoption, as well as learn from the way that we are deploying our stations. So we are trying to make sure that we are understanding customer behavior, techniques, pattern, power quality issues, how rates impact customers, kind of a host of issues that our pilot is intended to address.

In terms of how we are marketing these stations, I think, again, it's more about meeting a market need. I think at this stage in the market, the more players and the more robust the market is the better for everyone. Ranging value is still a big issue within the market, and so the more -- the more charging stations there are the better. We would like to reduce that perception that drivers cannot get from point A to point B if they don't have a ICE vehicle.

However, as -- to echo what the City of Tallahassee said. When we do look at how we site our stations and what we are providing, we look at

Best Practices. So in order to meet that market need, as well as ensure that our customers have a robust and positive experience with our charging infrastructure, we focus on making sure that we are addressing market gaps.

So we are not trying to be the gas station approach, where you have two gas stations set up across from one another. We are trying to make sure that we are deploying our infrastructure in way that meets the gap for our highway public infrastructure. This ideally is focused on having infrastructure approximately every 50 miles.

We are also focused on ensuring that it is sited in a safe location with amenities that the drivers can use, as well as that public access is available 24/7.

And that I think from a marketing perspective, it's less marketing our systems, our stations over someone else's, and rather, that drivers are aware of our locations. And I think there are a number of apps and websites out there where drivers share when locations are coming up, as well as, you know, the status and their experience at those locations.

So from our perspective, it's more about EV drivers having a positive experience, sharing that

positive experience with others so that they are helping for adoptions, and that's how we are, you know, placing ourselves above another player within the market.

Thank you.

MR. EASTMAN: Okay. Thank you.

JEA.

MR. LEIGH: Yes. JEA agrees to a large extent with FPL's comments in that we think third-party providers can probably satisfy the retail transactions more effectively than a utility directly. And we recognize there may be gaps in the retail charger provisioning that a utility may need to serve on some kind of temporary basis that, you know, it would be to primarily facilitate the expansion in the market and ensure a positive customer experience.

Thank you.

MR. EASTMAN: OUC.

MR. WESTLAKE: Pete Westlake from OUC.

All of our charging stations are branded and one of the things that we are very particular about is we have service -- service levels for making sure that problems are -- are handled in a timely manner so that people can -- can feel comfortable

that these sites are always going to be available for them.

With the new charging hubs that we are starting to deploy in Orlando, we will ensure the highest level of safety is considered for lighting and for all of -- all of that work so that people can -- can be very comfortable that -- that what we deploy is -- is -- it looks good and it is well maintained and it is -- and it's a safe environment for folks.

And we will be looking at -- at signage on major roadways coming in, so that people can know where they can be directed for it. And obviously, posting to all the apps to make sure that these sites are available on -- on all of the potential apps.

That's it for us. Thank you.

MR. TAYLOR: Thank you.

Tampa Electric.

MR. HERNANDEZ: Yes. Kenneth Hernandez here again with Tampa Electric.

And we would agree with the comments made earlier by Florida Power & Light with respect to looking for opportunities to really help facilitate participation in the market by customers as well as

drivers, but also from a pilot perspective, pilot program perspective, there would be an emphasis on making sure that we've got sufficient driver access certainly for the safety considerations, and then ensuring utilization so that data collection actually takes place.

And that's all. Thank you.

MR. EASTMAN: Thank you.

Advanced Energy Economy.

MR. COWART: Hey, Dale, this is Dave Coward with City of Tallahassee. Can I just jump in real quick?

MR. EASTMAN: Sure.

MR. COWART: One thing I think I think the Commission needs -- one thing the Commission needs to remember is that a utility like the City of Tallahassee has a very small and compact service area compared to someone that stretches across the state or multiple counties.

Our marketing focus and, you know, needs, they differ by, you know -- but really, some of that is the same because you want them all to have a positive experience, but just a difference in the territory makes a difference on how you approach stations, station locations and -- but with the

goal of having a good driver experience for everyone.

So just keep that service territory issue in mind as you guys are contemplating development of policy or rules.

And thank you for letting me interrupt.

MR. EASTMAN: Yeah. No problem.

So we will jump back to AEE.

MR. GARCIA: Thank you. AEE doesn't have any additional comment at this time.

MR. EASTMAN: Thank you.

ATE.

MR. JONES: Yes. This is Phil Jones for ATE.

So at the outset, I would just say I agree with some of the other comments that, you know, utility owned infrastructure that's branded is possible. There are a variety of ways in which the utility can work with vendors so competitive neutrality can be achieved in that manner through the RFP process.

I think the RFP process is a good way for the Commission to oversee, and for the utility to test the market place to see what both hardware and software vendors are offering in the marketplace. But again, the make-ready money -- make-ready model

is possible. The leasing is possible too.

So the other thing the Commission needs to ensure is nondiscrimination among the various players, and they can do this through, as I said, through the RFP process, through regular reports to the Commission by ensuring that, for example, if the utility offers public DC fast charging infrastructure that they price it accordingly, they don't undercut, but they don't overprice either. So the gas to electricity price comparison is really important here, but they should be allowed some flexibility to price according to, quote, the market, because the cost of service rates are probably not going to be possible for a while, at least on DC fast charging.

So those should be updated quarterly, and I think Duke proposed that in South Carolina, and is proposing that in North Carolina. So if they -- if Duke owns and operates infrastructure and prices it, they should reflect, quote, the market price.

And then finally, technology types. The Commission should not discriminate between various types of charging coming in. They should allow the market to develop wireless induction charging, it may or may not come for the electric buses. It's

case specific pantagraph, this overhead pantagraph charging, and so the rate design of a program offered by the utility or vendor will change according to that.

So I think through those sort of metrics and reports, the Commission can ensure the statutory mandate of competitive neutrality, but don't -- but again, don't -- don't come in with a preference at the outset on the ownership model.

MR. EASTMAN: Thank you.

ChargePoint.

MR. WILSON: Yeah. Thank you for the question.

So I think your question initially talk about competitive -- competing for the ability of a driver -- or to get the business of an EV driver. As a provider of EV charging station hardware and software solutions, for ChargePoint and others in the industry, a lot of that competition is for a site host, to host those charging stations. And so ChargePoint's comments in the docket focused in on competition for the site host. And the site host can be a couple of different entities, right? It can be a private property owner. It could be a third party owner/operator of the charging station

that's actually just leasing the land, so to speak, for the charging services. And in that instance, that could be a private entity. It could also be a utility potentially.

But in the area for competition for site host of where these charging stations are located, as well as the products and services that the site hosts are utilizing, ChargePoint offered, I think, three key principles to ensure that competitive neutrality.

The first is providing site host some level of choice in the charging station hardware that is located on their property. As has been noted, that has the ability to offer some consistency both across municipal, state, regional jurisdictions. And site host, we think it's important for them to have skin in the game. That makes them want to put the charging stations out front. It makes them want to create a really good experience for those charging customers.

The second is site host choice in pricing. We think it's important that site hosts have the ability to be the customer of record in any programs, and pay that utility bill and potentially gain any upside from EV charging revenue.

We think it's fine if there are other pricing mechanisms that are available to customers, or to site hosts, be it via the utility or the via third-party, but we do think it's important that the site hosts, you know, have some sort of ability to control that point of the competitive atmosphere.

And finally, we think it's important for the Commission to look at programs that the utilities may offer in advance of that offering. And I don't want -- I want to be cautious and say that this is a new process, this is a new thing the Commission is considering, and so anything that's previously filed, previously contested, I don't think this applies to. But I think going forward, as the market expands, it's important for those PSC -- or the Public Service Commission to continuously hear from those site hosts about if utility plans are, in fact, competitively neutral in allowing them the access to the program that is necessary for that level playing field.

Thank you.

MR. EASTMAN: Thank you.

All right. Drive Electric Florida.

MR. ALFORD: I apologize. I had myself on

mute there.

MR. EASTMAN: No worries.

MR. ALFORD: Yeah, I certainly think that a lot of our members have done a very adequate job addressing this. Again, we have gone on record in some open dockets in terms of the role that the utility can play, avoiding that, but kind of just distilled to its essence, if the number of participants and companies making investment in EVSE increases so that the relative value of their individual asset, so for that reason, Drive Electric Florida is generally supportive of all considered investments, you know, the -- the utilities have taken a few different approaches to this growth, just very quickly, facilitators and partners, to customers, state managed charging programs, they provided infrastructure and owned it in some cases. So I think that the high level of competitively neutral approach shouldn't prohibit the utility investment in ownership of charging stations, or favor, you know, private party investment and ownership. So excluding one or the other would be anticompetitive. So allowing for a mix of programs, actors, investments, approaches and ownership models with appropriate regulatory

guide rails is probably the best way to support the diversity of buyers and sellers of products and services that collectively comprise the EV charging marketplace.

So thank you.

MR. EASTMAN: Thank you.

EVgo, if you are still with us. No, I guess not.

Okay. Greenlots.

MR. COHEN: Thanks. Dale, would you mind repeating the question? I just want to make sure I am addressing the specific question at hand.

MR. EASTMAN: Sure. No problem.

How are you planning to differentiate your charging stations from one another in order to attract customers? Or is that ability not really attainable?

MR. COHEN: Okay. So let me offer -- let me offer a couple of -- a couple of principles or thoughts on this, and let me first say that, just by way of explanation or introduction to Greenlots, for those of you who may not be familiar with us. As company, we are primarily a software and services company. Generally speaking, we do not own and operate charging stations. So, I mean, the

question is directed more, I think, towards an owner/operator, whereas Greenlots, we typically sell our products to end users, whether it's utilities or office buildings or governments.

And so that said, I think there are a few key principles when it comes to attracting customers. So one of them, I think, which -- and this has been mentioned before, but first and foremost, make sure the stations are operable. Make sure that they are in good working order. Make sure they are well maintained. Make sure they are not out of service or just left stranded because of a lack of a service plan, or anything like that.

Number two, make sure that the charging experience and the pricing is consistent, as I have said before, no unwelcome surprises is a sure way to leave a bad taste in the driver's mouth.

And as Phil was mentioning, make sure that the pricing charged supports broader goals. So on the one hand, you want to provide savings relative to other tool types, because that is one of the, you know, the main motivators for people to drive electric in the first place, but you also want to set a price that supports the growth of the charging market, and not undercut the market price

range, so to speak. And also you want to avoid creating an expectation of unrealistically low prices for the future.

One of the challenges with the whole pricing is that, at least at this stage in the -- in the market, this stage, EV adoption -- the economics really are challenging at best, if we are talking about a return on investment, you know, just focused on a specific charging asset. And so allowing too much site host flexibility to set their own pricing can undercut these other goals we're talking about, fuel savings, but typically savings relative to other fuels. And it also points out one of, like, the key issues in terms of how to view this whole question around competitive neutrality, where, when you are talking about a utility provided service, the utility is the market participant. It's not the site host.

Site hosts have full customer choice whether or not to participate in a utility program, or whether they want do their own thing. But if we are talking about rate payer dollars and utility provided service, the utility is that market participant. The utility is where the focus should be in terms of designing the program, setting the

pricing with regulatory approval, procuring the hardware, procuring the software, you know, all -- that whole bucket that relates to EV charging.

And bringing us back to the pricing, that's one of the reasons why utilities are really well positioned, particularly at this stage in the market, because a utility is able to look at that charging asset, not just how do I make a return on the cost to install and, you know, operate this fast charger just in a vacuum, you know, the way a stand-alone site host might look at it. The utility is able to look more broadly at the value overall to the grid and to ratepayers of the EPE code system.

So -- so that's point two, the charging and pricing consistency piece. And then the third piece is just to market the heck out of the charging station. As I think Jill and others mentioned, there are a number of free apps. If you have an EV, you can find the stations pretty easily, and there is a number of different companies that provide the service.

The real issue is not -- not so much attracting a customer that's an existing EV driver that's in the area. It's really creating more

customers, and marketing the heck out of these stations is a really important way to do it. Ribbon cutting with local officials. Get local press coverage. Do emails to drivers in the area. Do just hard mailings, you know, hard copy mailings.

And again, there is a number of actors who can do all of that, but when you look at the bulk of charging experience consistency, pricing consistency, marketing, maintaining the stations in good working order, it's like -- I mean, utilities are certainly not the only actors who can do that, but really well positioned to do all of that.

Thank you.

MR. EASTMAN: Thank you.

Tesla.

MR. BEAN: Thanks.

We've built a very extensive network for DC fast charging for our customers, and we've tried to make it as convenient and seamless as possible, and that's always drives us, and the best customer experience possible. So we are seeking locations that are convenient where people are driving, that have good amenities, and making sure that service is reliable and fast.

In terms of marketing stations, we've tried to take as much thinking out of it as possible by integrating the charging locations into the vehicle user interface so that while people are driving, they see where the stations are, what the realtime availability of the stalls are, what the pricing is, what the amenities are; and that if they are going on a trip, that they can just plug in a destination and the car will tell them and direct them to a charging station if they need it.

So we think that is -- there is a number of different ways to kind of bolster the customer experience, and I think that should be left to the companies that are owning and operating or investing in the charging stations. But in general, for kind of Commission or state sponsored charging networks, I think the goal, like we said in our comments, is not just -- trying not to put a thumb on the scale and trying to be as competitive in equal terms as possible so that people can compete on price and compete on service, because otherwise, you could have some unintended consequences, or higher costs, or slower time lines for deployment.

So some of the topics to think about are

treatment of participation and line extension policies, making sure everyone is on the same -- or have the same options as rate designs; not providing preferential treatment or information that the competitive marketplace might not have, so this could be like hosting capacity, or information about where other charging operators are going.

And then I forgot who mentioned it previously, but avoiding the kind of exclusivity arrangements with site hosts. So although 99.9 percent of all DC fast charging that happens on Teslas is on the Tesla network, Tesla Supercharger network. We don't sign exclusively the arrangements with site hosts. We think that's just bad policy. And we do co-locate with a number of other charging operators and utilities that are on the line here, and that's a good model. So just basically trying to make sure that everyone is on equal footing.

Thanks.

MR. EASTMAN: Thank you.

And Sierra Club.

MR. SHOAFF: Thanks. Sierra Club doesn't have any particular response to this question.

MR. EASTMAN: Thank you.

And finally, SACE.

MR. CROSS: Thank you. This is Stan from SACE.

And, you know what -- what I will add is, just stepping back a level, is that collectively utilities have reached to 100 percent of Florida's residents, and if we are to realize the benefit of electrification as it pertains to ratepayers, and that is downward pressure on rates for all ratepayers, then we need to get mass market adoption of electric vehicles. And utilities are well positioned to engage in education and outreach across all of Florida's demographic segments.

And SACE, from an advocacy perspective, believes that it is prudent for utilities to be investing in education and outreach, and for the Commission to be encouraging and supporting education and outreach as part of utility transportation electrification filings.

And I am not just talking about where the stations are, but rather education and outreach that communicates the benefits of transportation electrification clearly, and in a compelling way to various market segments so that the customers that aren't yet there, that Josh from Greenlots was referring to, are continually showing up at the

stations in new and larger numbers.

Thank you.

MR. EASTMAN: Thank you.

I have two questions left.

The first one is going to be can -- this is going to be targeted for everyone, so I am just going to go down the list again: Can the rate basing give utilities a competitive advantage?

I will start with the City of Tallahassee.

MR. COWART: Ben Cowart, City of Tallahassee, and I am going to pass on that.

MR. EASTMAN: Duke Energy. Duke, are you still with us? No? Okay.

FPL and Gulf.

MS. DVARECKAS: Yes. You know, I would say that, you know, as the utility, we are obligated to act in a way that's best for our customers, and so I think that those are the principles that we would uphold in the deploying infrastructure and establishing any type of ongoing infrastructure ownership plan. And so I think given the fact that we serve all, you know, all customers within our territory, including EV drivers as well as, you know, a number of the parties on this call, and vendors, and service providers, and site hosts are

all considered our customers, you know, as the utility, I think we view our actions as, you know, ensuring that we are acting in the best interest of all of those players.

So, you know, I would say that I don't think it's necessarily a competitive advantage. I think that, you know, rate basing infrastructure allows the utility to provide benefits and address issues that the competitive market perhaps cannot address, which, in general, it helps for the market overall, and should be viewed as a benefit and not a detractor from how we participate in the market.

Thank you.

MR. EASTMAN: JEA.

MR. LEIGH: JEA is a community owned utility, and JEA -- and I will prefer the decision regarding how infrastructure is recovered be left at a local level, and JEA chooses not to -- (inaudible) -- to the question.

Thank you.

MR. EASTMAN: OUC.

MR. WESTLAKE: Can you please repeat the question?

MR. EASTMAN: Can rate basing give utilities a competitive advantage?

MR. WESTLAKE: I am actually going to pass on that one.

Thank you.

MR. EASTMAN: Tampa Electric.

MR. HERNANDEZ: Yes. Kenneth Hernandez again for Tampa Electric. We have no comment currently on that.

Thank you.

MR. EASTMAN: Advanced Energy Economy.

MR. GARCIA: Thank you. I guess we will just note that this question is a bit vague, and it really depends on what you all are talking about when you are talking about rate basing. If we are talking about investments in make-ready and traditional utility infrastructure, either in front of or behind the meter, conduit, wiring, you know, transformer upgrades, et cetera, you know, all of those things -- many of those things are typically accounted for in traditional utility distribution system investments, so I don't think there is any sort of incremental or inherent advantage to allowing utilities to put into rate base what they have traditionally done for other end uses, or accommodating other loads.

If we are talking about rate basing of

charging stations or charging infrastructure, again, that has to be done on a case-by-case basis. But again, if the Commission finds that that approach will, you know, ultimately expand the market for EV charging services, provide consumer benefit -- or customer benefits in the form of increased access to trans -- electricity as a transportation fuel, encourage offbeat charging in a manner that benefits all utility customers through downward pressure on rates, you know, there really needs to be a comprehensive, you know, assessment of whether that rate basing is, again, you know, in the public interest and consistent with, you know, Commission practices.

So I -- I think it's hard to boil this down into a narrow concrete answer, and it merits further -- merits further exploration.

Thank you.

MR. EASTMAN: Thank you.

Alliance for Transportation Electrification.

MR. JONES: Yes, Phil Jones for ATE.

The basic answer, Dale, is no, this does not provide the utility with any competitive advantage, and the reason is as follows, as I stated before, the utility investment, especially in make-ready

from the transformer to the sub where the equipment sits is a foundation investment. It is going to become part of the distribution grid in the future as it evolves for by directional flows, energy storage and all sorts of applications as a response.

So increasingly, what we are seeing around the country is both legislatures, commissions are regarding investments in EV infrastructure as a plant asset as defined in the FASB and the other accounting practices and rules that commissions follow. And I would encourage -- so I would encourage the Commission to look at it that way. It's not a competitive advantage. It's a -- it's an investment in foundational infrastructure, and it should be included either in a regulatory asset, which is the preferred treatment that we are seeing in many jurisdictions around the country; but if you don't like a regulatory asset or tracker that's trued up later in rate case with a prudency review, you can use other techniques as well.

But the utility is entitled to a return on that investment, not just operating, but on capital, and -- and you should regard it as a normal increasingly, if you get to 1.4 million

vehicles in Florida by 2030, there is going to be along this infrastructure grid that benefit all ratepayers, and so you should regard it accordingly. So no competitive -- no competitive advantage there.

That's it.

MR. HINTON: Dale, this is Cayce. Let me jump in real quick just to clarify the question a little bit, maybe save some time on some of the responses.

We think the question is specifically geared toward rate basing investment and charging stations themselves, that -- if that is considered to be a competitive marketplace for charging electric vehicles. We are not talking about building out or make-ready the distribution system. We are talking about the charging station itself, is the rate adequate, does that provide a competitive advantage?

Thank you.

MR. JONES: Could I respond on that quickly then? This is Phil Jones for ATE.

So in answer to that question -- in answer to that question, the capitalization of the rebates, if you use a make-ready and rebate model, that is a legitimate question for the Commission to ask. So

in Michigan and Minnesota, and other states now, the utilities have proposed, and the commissions have generally had a capitalization treatment for rebate, and the reasoning is as follows: This is a transformational period, it's an asset. The EVSE, the equipment that sits on the charging station, as you call it, really should be considered part of the EV ecosystem. The money flows to a different provider. It flows to the EVSP, the EV station provider, but many commissions are regarding that as a part of this transformational process, and therefore, since it's part of a utility make-ready and rebate program, we believe the equipment itself should be capitalized.

That's it.

MR. EASTMAN: Thank you.

ChargePoint, with regard to the clarification on that question.

MR. WILSON: Yeah, thank you.

I think for -- what ChargePoint believes is that utility investment in electric vehicle charging station and rate basing those can be structured in a way that does not impact -- can be done in a competitively neutral way.

And I won't reiterate, but I will point back

to ChargePoint's comment in the docket and we view the structure of those comments creating some optionality for the site host, as well as understanding the full suite of programs in addition to the charging stations themselves, where utilities may be making investment to -- to be useful in understanding if those investments could create some competitive issues. In instances where we believe that the competitive issues are nonexistent, ChargePoint supports utilities' ability to rate base and earn a capital return on rebates, on make-ready, and on the charging stations themselves; again, assuming those competitive issues are cleared.

MR. EASTMAN: Thank you.

Drive Electric Florida.

MR. ALFORD: Yeah. Matt Alford, Drive Electric Florida.

Those are two hard acts to follow, ChargePoint and ATE. You know, I think that -- and Cayce, thank you for that clarification, because I think that it's really going to come down to how those programs are designed, you know, if it's done well, investments by the utility and infrastructure, you know, a portfolio approach that addresses rural and

low to moderate income communities that may not attract private capital or other investments. Whenever it's done, it removes barriers to adoption, so you are spurring development in the market and the relative value of everyone's assets are greater.

And really, whenever you think about the geography in the state of Florida, many communities don't see themselves as a part of this conversation, and utilities are extremely well positioned to alleviate that.

So -- and, again, I think that I would be remiss if I didn't once more point out, right, that the overall benefit to the ratepayers might justify some of these investments in a competitive neutral way. It's just going to depend on how the programs are designed. And if you are talking about improving air quality and health outcomes, and serving the general body of ratepayers, it's, you know, it's going to be an important thing to drive adoption from Floridians.

So my short answer is no, but with an asterisk. It will depend on how the program is designed.

Thank you.

MR. EASTMAN: Thank you.

I am sorry, I was looking at the screen.

EVgo I believe is up next, but I guess they are still not with us.

Okay, Greenlots.

MR. COHEN: Dale, I am going to ask you one more time, if you don't mind, to sort of repeat the question.

MR. EASTMAN: No problem.

It is: How can rate basing give utilities a competitive advantage with regards to charging station infrastructure?

MR. COHEN: Got it.

So it's -- it's a really -- that is a really important question, but I am going to respectfully push back a little bit on the premise of the question, because if we are talking about competition for the competitiveness of the EV charging market, the notion that there is a competitive EV charging market today, if by competitive, one means profitable, is one that I would -- I would disagree with. I think there is a number of private actors in this market, including owner/operators of public charging stations. It's very encouraging that there is private capital

flowing into this market, but all you have to do is look at some publicly available documents to see that, as a business model, the profitability case for deploying, owning and operating charging stations, public charging stations, is yet to be achieved. We are all hoping we get to that point sooner rather than later, but we are not there yet.

So -- so regulated utilities precisely, because they can earn a rate of return, are uniquely positioned to help deploy and own and operate charging stations specific -- for many reasons, but specifically because of the challenging economics of it.

And I am not going to repeat what I said earlier, but the notion that utilities are somehow competing for a share of the profits on an asset by asset basis is one that I would -- I would question.

So, you know, maybe in five years, maybe in 10 years, who knows when that equation will change a bit, but I think it -- and it's obviously an important question about does rate base offer utilities a competitive advantage? But I would encourage the Commission and staff to be thinking about that question within the context of the state

of the charging market today from a profitability standpoint.

Thank you.

MR. EASTMAN: Thank you.

Tesla.

MR. BEAN: Thank you.

In terms of utility ownership, I would say not necessarily, but the question really hinges on whether that cost of the rate based equipment is reflected in the end use for the driver.

So when we think about pricing on our network, and I think some other charging operators agree, what we are trying to do is recover the cost of operation, so that's going to be electricity, the maintenance, any site costs, as well as recovering the fixed cost of the investment and installation.

So if the pricing doesn't reflect the CAPEX, or the rate base portion for to the end use driver, that's not necessarily because it's in rate base, it's because it's not being reflected to the end use driver, that that could lead to a competitive advantage but not having to reflect that price.

So I think with anything else in economics, it's just making sure that all of the costs are reflected in end use to the customer is the best

way to maintain the kind of balanced competitive level playing field.

Thanks.

MR. EASTMAN: Thank you.

All right. Last question. Again, I am just going to go down the list for everyone's comments on it.

The question is: Should there be any limitations to utilities' EV charging station ownership?

MR. CROSS: This is Stan Cross from Southern Alliance for Clean Energy, just letting you know that Sierra Club and SACE did not yet respond to the last question.

MR. EASTMAN: Oh, I am sorry. I'm sorry. Excuse me. I jumped a head. I am sorry, Sierra Club and SACE.

Sierra Club, can I get your --

MR. SHOAFF: Sure. This is Nathaniel. I am happy to answer on behalf of Sierra Club.

I think we have heard today a broad consensus that the utilities have a role to play in this space. And from Sierra Club's standpoint, it's something that we noted in our comments, is that some of the other states have done on this --

(inaudible) -- analysis of this very question into their evaluations of utility proposals. And so we've seen states that have some sort of competitive test. Usually something like is the program reasonably expected to stimulate innovation or competition rather than stifle it?

In our view, well-designed programs are usually going to meet that test, and that folding that analysis into consideration of utility proposals is worthwhile. And if this commission decides that -- one of the things we could suggest the Commission do is to encourage utilities to put forward transportation electrification proposals, one of the things that the Commission could do is to specifically direct utilities to address this question in their proposal. Explain why this utility investment, in whatever the space is, but specifically to own a charging infrastructure isn't going to stifle the competition.

Thank you.

MR. EASTMAN: All right. Thank you. Sorry about that confusion again, I was typing -- I was typing next to the wrong name, so sorry about that, SACE and Sierra Club.

SACE.

MR. CROSS: No problem at all. This is Stan from SACE.

You know, I think building off of AEE and Greenlots' and Sierra Club's comments, SACE believes that utilities ought to be able to rate base ownership of charging assets at this nascent time in the market when they can justify doing so. And there -- as we have been talking about, there are lots of use cases for utilities to be engaging in, but there are some immediate use cases that are in need of attention that utilities are uniquely positioned to support. They include charging infrastructure in low to moderate income communities. They include charging infrastructure in rural communities. They include filling the gaps along corridor charging, supporting the need on charging for evacuation and resilience planning. There are many use cases where the utility is uniquely positioned to provide services that the current market may not be able to meet.

And to Greenlots' point, you know, when considering whether or not rate basing is appropriate in a given context in a given filing, that question should be being asked in the context of the current market reality, not in the absence

of that reality.

And until we have a market that shows profitability. Until we have a sufficient number of players who can install infrastructure, and ensure the long-term operation and service of that infrastructure, then there is a need for, you know, a reliable party like a utility to step in and play a role.

So we support rate basing of utilities' ownership investments when, you know, it is meeting a particular use case in a particular moment that helps drive the market forward so that everybody can benefit.

Thank you.

MR. EASTMAN: Thank you.

All right. So now to the last question. Sorry about that, everyone.

All right. So for the last question again, like I said, I am going to go down the list: Should there be any limitations to utilities' EV charging station ownership?

I am going to start with City of Tallahassee.

MR. COWART: Ben Cowart, City of Tallahassee. And I am going to pass on that.

Thank you.

MR. EASTMAN: Duke.

MR. KING: Hey, this is Peter King with Duke. I apologize on the last question, I had a situation I had to attend to and I had to step away.

So a couple of things. On the rate base piece of it, I would agree on the comments prior about it being within context specific to the case itself, from a broad perspective it's hard to say. So that would be my answer on the rate.

The second question again, could you repeat that again, please?

MR. EASTMAN: Sure. It is: Should there be any limitations to utilities' EV charging station ownership?

MR. KING: Right. I am not sure we know the answer to that yet. I think that's what we are trying to prove out with our pilots as a utility is trying to prove out with their pilots, and I think that's what the importance of this work is, and hopefully the Commission will continue to explore and allow for the utilities to -- to get in the marketplace and figure out what works well for everybody involved.

We have found, just in a couple of years with our program deployed, we have given covered

benefits we didn't know were going to be there, and some of those benefits -- and that's, you know, part of it you just don't know it.

And to Ben's point, you know, a lot of this will depend on the type of utility an the service territory that the utility is working in. We are very spread out across the state of Florida. And what we have found is a big benefit to our deployments have been the ability to serve under-- what we would call underserved areas for charging infrastructure. And then -- and those areas may be rural areas.

And then the other part that has followed up is a huge benefit, we think, are -- is the ability to connect the very, very important secondary corridors in the state, which are if 1,000 people moving here today, there has been talk about evacuation routes. The secondary corridor, if you talk to the people in these communities, they will tell you how vital these are to get out of the state. And we have been able to, based on where we serve, connect some important key secondary corridors.

So that's another benefit that has bottled up, and we will continue to see, I think, other

benefits, some going into it we thought would be a benefit and have been, for example, have been the utilities -- we have been able to take care of these units. We -- we respond quickly, and we keep the units -- it's important to us to maintain what we call a healthy network, because at the end, that is just what drives EV adoption, a better experience across the board with all customers in the marketplace.

So, yeah, we think there certainly is, based on some of the really key methods we have seen with our deployment, definitely a role for the utility. And then the, I think, big role for utilities is hopefully, I kind of liken it to energy efficiency, where we -- we did the rebates for energy efficiency measures to transform the market, and we look at it like that. We like to see all kinds of EV investment come into these other areas that we are serving. And we are hoping that what we have deployed and started as foundational infrastructure will attract these other -- all market players, and just build out the entirety of the structure, you know, for all customers, and for everybody -- the benefit of all the folks and ratepayers in Florida.

That's all I have.

MR. EASTMAN: Thank you.

FPL and Gulf.

MS. DVARECKAS: Thank you. That was very well put by Peter.

I would like to reiterate that, you know, we feel that utilities are very well positioned to address infrastructure needs within the market in a way that not only improves reliability, the use of the grid puts downward pressure on rates, addresses gas, responds to needs within the market that the competitive market cannot address.

Other areas -- a previous point that, you know, we do feel that the current regulatory structure is sufficient to address those needs, and that the PSC should continue to be empowered to oversee and implement transportation electrification plans.

What I would like to touch upon there is that we do believe that this should be done on a case-by-case basis. We think it's important that any policy not be overly prescriptive and have the unintended consequences of impeding market growth -- (inaudible) -- has a light touch touched regulation that I mentioned previously.

On that note, as Peter mentioned off above, it

totally -- it is early within the market. We are still in the pilot phase. We are still learning about EV infrastructure and what the utility's role should be, and we are still recognizing the benefits that utility involvement can offer. I think putting any limitations up front, as I mentioned, could impede market growth, and I think it may be too soon.

And then, I think, to echo Josh from Greenlots' comment on, you know, the competitive market, I would -- you know, I would comment that his point where the market is still standing itself up, I think any, you know, any restriction could be -- could be detrimental to the growth of the market.

So while I am not saying that, you know, utilities should not be regulated. I believe that that is the Commission's role here, and that it should really come down to what is in the public's best interest. And that is something that we hold ourselves to, you know, as a regulated utility, in ensuring that the needs of all of our customers are met.

Thank you.

MR. EASTMAN: Thank you.

And, JEA.

MR. LEIGH: Yes. Like my previous colleague said -- and I guess just backing up. Any questions typically framed "are there any", the answer is generally probably or yes.

With that said, though, the evolution of this market is really so immature at this point, and, you know, particularly being a muni with so many low and moderate income customers making up our customer base, it really does get problematic to start layering on restrictions before the market starts evolving and some of these questions become clearer.

So I think at this point, it is -- it is definitely too early to start imposing restrictions when we don't know the cause and effect that it may have downstream.

Thank you.

MR. EASTMAN: Thank you.

OUC.

MR. WESTLAKE: Pete Westlake with OUC.

I think we would think that in the short-term, imposing any requirements would not make sense. Utilities are closest to their customer needs. We have the capability to best position and balance

items like load, maintenance and additional technology to best manage both the cost to operate and, therefore, the cost to our customer. We can look at the entire benefit for an EV.

We capture the revenue at the home, at the workplace and also at the high speed charging station, so we can take a look at the entire revenue case where -- where -- so that we can balance it and make sure that those investments are -- are producing the results that we are looking for, and to what I would really consider a loss leader of the high speed charging hubs as, I think, has mentioned before are really not money makers.

This may, of course, change as the opportunity and growth of electric vehicles substantiate the need for expansion in that area. So I wouldn't say this is a closed answer. This is the answer for today.

Thank you.

MR. EASTMAN: Thank you.

Tampa Electric.

MR. HERNANDEZ: Yes, Kenneth Hernandez with Tampa Electric again.

So we would echo some of the comments that you

have already heard, and particularly those from FPL, and we will just sort of restate some of what you have heard to say that active utility participation in the market will ultimately help to inform the need for any potential limitations, but also identify any of the opportunities for utilities to participate in the market.

That is all. Thank you.

MR. EASTMAN: Thank you.

Advanced Energy Economy.

MR. GARCIA: Thank you. This is Noah Garcia again.

And I think in answering this question, we certainly agree with the points raised by Sierra Club and SACE in the previous question, particularly the point that utility ownership of charging infrastructure should be permissible, provided that utilities are able to make a reasonable case for why that investment is needed and how it's serving a market need.

And just to round out our comments, you know, we will reiterate that, you know, regardless of the role, utilities are going to be essential partners in supporting the growth of the EV charging services market. And rather than cycling this

market, utility programs can offer new avenues for competition among EV charging service providers, establish markets for EV charging services where they previously did not exist, and potentially extend a greater choice to all customers and EV charging services.

And with this point in mind, I think we would want to urge the Commission to take a flexible approach to EV charging infrastructure deployment models in some particularly underserved for market segments, you know, for example, multi-unit dwellings or highway corridor fast charging utility ownership may be justified and even encouraged by some EV charging service providers as a means to increase access to charging in these areas.

So just to wrap up, we see a value in the Commission taking a flexible approach, and look forward to future actions the Commission will take these issues.

Thank you.

MR. EASTMAN: Thank you.

Alliance for Transportation Electrification.

MR. JONES: This is Phil Jones with ATE. And I would echo Noah's comments, you should take a flexible approach. So the answer on this question

for us is no, it's not a good idea at this nascent stage of market development, it's developing, it's still pretty early.

This idea has come up in other states, and some commissions, or Commissioners, have suggested a five-year period, or a percent of market, 20 or 30 percent of the utility role, and at that point something else happens. But both a temporal limit or a percent of market share limit is a bad idea. It would have a chilling effect on the market, and it would slow down the entire process in Florida.

What you can do in a positive sense is keep your eye on this issue to evoke planning, as I mentioned before, a plan that's updated every three or five years, or existing filings that have been approved for rates, for Duke, FPL and others, and just oversee this, and because it is going to be very end-use specific for some more of these challenging use cases like multi-family and rural, and some other use cases, the utility role will probably be bigger in the beginning, but it might not be as big in the future, and allow the overall marketplace to develop.

So I -- again, don't impose these limits at the outset. You have more than adequate authority

to oversee this through your powers of investigation and oversight, and, you know, I am sure you can do it well.

That's it.

MR. EASTMAN: Thank you.

ChargePoint.

MR. WILSON: Thanks.

So I think, you know, thinking about this from the specific question under the broader frame of competitive neutrality, you know, I would go back, and I think several folks, and Phil mentioned this, you know, look at it in the context of a specific plan or -- excuse me, a specific program proposal or a suite of those things offered in a plan.

So I think what we would offer is that, you know, the Commission should consider -- consider these programs in advance. Do a screen for competitive neutrality. If it is determined that competitive neutrality is not an issue, then utilities should be able to proceed with programs for a period of time under that determination by the Commission. And when utilities come in at the end of those programs and propose new ones, or extending them, revisit the issue.

It's going to be a changing marketplace over

the -- the next couple of years, decade or decade-and-a-half, so I think it's something that needs to be continually evaluated.

As the commenter, you know, earlier said, you know, you can award any is a little bit dangerous, so to speak, and so I think we should be careful and say that there are no issues, but we should also be careful in prescribing any issues without looking at specific proposals and products.

Thank you.

MR. EASTMAN: Thank you.

EVgo, have you joined us again? No, okay.

Greenlots.

MR. COHEN: Sure.

I think if the question is should there be any limit or restrictions on a utility investment or ownership, was that the question basically?

MR. EASTMAN: Correct. Yes, basically.

MR. COHEN: Okay. So, I mean, at a high level, yes, there should be, in the sense that utilities should not be the only owner/operators of public charging stations. We need multiple architects, you know, just the flip side of that is private network owner/operators should not be the only providers of the service. We really do need

multiple actors to not only address unique challenges of different customer segments, but to grow adoption overall, and to accelerate adoption.

So -- so with that said, I think a couple of other key points are that utilities not doing a charging program, I think, and not at least step, you know, dipping their toes in and putting forth some pilots, I think, is not a long-term strategy that will -- that will benefit ratepayers. And so the fact that the Commission is holding this workshop, and has held prior workshops, is encouraging, but I think more is better, more approaches, a portfolio approach of offerings. And so I would say discouraging utilities from just focusing on a particular use case makes sense.

I would also say discouraging utilities from having metrics and learnings is also not the best approach, flip that around and say there is a whole lot of learnings, and what works in one state doesn't always work in another. Even if we think we have good data about EV usage and charging behavior, what works in one part of the service territory might not work in another part of the service territory.

So learnings are really important, and

sometimes low customer uptake, or low participation in a program is not a bad outcome, so --

And then just as a final note, I would say in terms of restrictions on utility programs or approaches, again, going back to the competitive neutrality goal, I would say limiting utilities and narrowly tailoring how they should do programs, and favoring one particular type of market after, and not others, is the wrong way to go. And just, I guess, as my close, to underscore that point really, from Greenlots' perspective, we are an active participant in the EV charging market. We've been around for over 10 years, and we have a business model, like I said, that's not an owner/operator.

So I think it would be shortsighted to view this -- this concept of competitive neutrality really just from a retail level or site host focused marketplace. Utilities, themselves, procure from the market, and there are many different -- different business models that utility procurement can support.

So I will leave it there, but I really appreciate this opportunity. Thank you.

MR. EASTMAN: Thank you.

Tesla.

MR. BEAN: Thanks. I don't have anything to add to the discussion thus far.

Thank you.

MR. EASTMAN: Okay. Thank you.

Sierra Club.

MR. SHOAFF: Yeah, I agree with -- this is Nathaniel. I agree with the comments of others that the Commission should not preordain one particular model for utility participation, but instead, in Sierra Club's view, the Commission ought allow for flexibility, it ought to encourage innovative proposals from utilities.

And as somebody else stated, utilities sitting out engagement on EVs and EV charging infrastructure is not going to realize the benefits for Florida ratepayers.

And for the grid, that could otherwise occur, and so we would encourage the Commission to make sure that utilities -- utilities are participating in this space, at least at the early stage of market.

Thank you.

MR. EASTMAN: Thank you.

And finally, SACE.

MR. CROSS: Thank you.

This is Stan again for SACE. And, you know, we -- we also concur that placing limitations, or thinking about utility engagement through the lens of where it should be limited is not the most productive way -- (inaudible) -- activity.

That being said, we do believe in, as argued in other regional dockets, certain expectations of utilities when they do engage, it's every and all instances, such as engaging in third-party evaluation measurement and verification of programs, and making that data available to industry stakeholders so that the utilities do not wind upholding on to proprietary information that provides a future advantage for the utility, or does not provide, you know, an ability for the market as a whole to grow in a -- in sort of the most efficient and effective direction --

MR. EASTMAN: SACE, are you still with us?

MR. CROSS: Can you hear me now?

MR. EASTMAN: Yes. You are back, okay.

MR. CROSS: Can you hear me now?

MR. EASTMAN: Yes.

MR. CROSS: Okay. I don't know where you lost me.

MR. EASTMAN: All right. It was towards the end. I am sorry.

MR. CROSS: Okay. It was to say that we -- (inaudible) -- encouraging -- (inaudible) -- encouraging the --

MR. EASTMAN: I think we may have lost SACE again. Okay. If we can't -- I guess if we can't get them back, I have no other questions --

MR. ALFORD: This is Matt, Drive Electric -- this is Matt from Drive Electric Florida. I think based on some of the things they've done in other markets, they would like to see utilities share the data that they get so that it can be utilized by all market participants I believe is the direction Stan was going, so that's all I will say about that.

MR. CROSS: That is the direction Stan was going. Thank you.

MR. EASTMAN: Okay. Well, thank you.

That is all -- SACE, does that finalize your comments? I won't cut you off.

MR. CROSS: Yes, it does. Thank you very much.

MR. EASTMAN: Sure thing.

Okay. Thank you, everyone. Those are all my

comments. Unless anyone who hasn't spoken up has something to add, I will throw it back to Ben.

MR. CRAWFORD: All right. Thank you, Dale, and all the participants in the discussion. Unless someone who hasn't had an opportunity to speak yet has something to add, we can move towards wrapping this up. This will be the last opportunity we are offering to comment, so if anybody has anything --

MS. CHRISTENSEN: Yeah, this is Patty Christensen with the Office of Public Counsel.

My comments at this point are just that as the Commission is considering what steps to take and balancing how to fill -- fulfill its mandate, statutory mandate in building out EV infrastructure, you know, we want to make sure the consideration is given such that, you know, cost to the general body of ratepayers is balanced against the people who receive any service at the end use so that, you know, cost to general body of ratepayers could be minimized, and those costs are being charged to the users where possible.

And, you know, it's been beneficial for us to hear kind of the comments from all the participants in the market and the utilities, and kind of get a better understanding of what issues the market and

EV stations are chasing at this point.

So with that, you know, I don't think I have anything further to add to the conversation. Still need to mull over everything that's been presented to the Commission here today, so I just wanted to chime in and let the parties know we have been listening to your comments and trying to get a better understanding of what's going on, and get a better understanding of some of the issues for consideration when we look at, you know, EV stations and pilot programs, and whether or not these infrastructures should be allowed into rate base.

So I appreciate the time and the chance to make just a few brief remarks.

MR. CRAWFORD: Thank you, Patty.

Did anybody else have anything they wanted to add?

All right. With that, I would like to thank all of our participants for joining us today. I think this has been very helpful in providing us with what we need to fulfill our duties toward the EV master plan.

I would also like to offer participants, as well as any other stakeholders, the opportunity to

file postworkshop comments if they have anything that they would like add or respond to regarding the material discussed today. Please follow the same procedures that were followed for the initial request for comments. File them with the Clerk's Office. And I would also recommend CCing me. Some of the things from the Clerk's Office didn't -- didn't make it to me the first time, at least not immediately. You can reach me, my email address is benjamin.crawford@psc.state.fl.us, or bcrawfor, omit the last letter of my last name, @psc.state.fl.us, they go to the same email address.

But I would ask for postworkshop comments to be filed no later than 30 days from today, which is November 20th, 2020, at 5:00 p.m. That's a Friday. And what we will end up doing with all of that is putting it on the same -- we have -- if anybody hasn't seen it yet, we have something on the PSC website under the utility regulation, the PSC website is floridapsc.com, and under the utility workshop -- or the utility regulation page, we have a subpage set up for this workshop, and we have preworkshop comments listed on there, and will be listing the postworkshop comments on there --

(inaudible) --

But anyway, thank you for everyone, and have a good rest of your day.

MS. DVARECKAS: Ben, hi, excuse me. Ben?

MR. CRAWFORD: Yes.

MS. DVARECKAS: This is Jill Dvareckas from Florida Power & Light.

Beyond the workshop comments, do you mind elaborating on what the process will be for the PSC going forward?

MR. CRAWFORD: What we are going to do is we are going to evaluate everything we receive. We have got some independent research we are doing as well. And we don't anticipate having any further workshops or anything. We have a deadline, essentially, to get our materials to the Department of Transportation by the beginning of February, and we are going to need to take it to the Commission to an Internal Affairs probably sometime in January, we think right now. So the time between now and when we take this to IA is going to simply be trying to mull through all the information we have, everything that we've got now, everything we get between now and -- and the postworkshop comments, and trying to put it together in some

sort of form that we will bring to IA. We are anticipating January right now, but that's not set in stone. And then from there, we will be forwarding it to the Department of Transportation. They are putting together the final order.

Does that answer what you were asking?

MS. DVARECKAS: Yes. Thank you.

MR. CRAWFORD: All right. If nobody has anything else to add, we can be adjourned.

(Proceedings concluded.)

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF LEON)

I, DEBRA KRICK, Court Reporter, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.

IT IS FURTHER CERTIFIED that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript constitutes a true transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 4th day of November, 2020.

DEBRA R. KRICK
NOTARY PUBLIC
COMMISSION #HH31926
EXPIRES AUGUST 13, 2024