

November 20, 2020

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To the Office of the Commission Clerk:

Pursuant to the Florida Public Service Commission's ("PSC" or "Commission") request for additional stakeholder feedback following the PSC's October 21 workshop, which was the last workshop prior to the release of the Electric Vehicle (EV) Roadmap for the state of Florida, Advanced Energy Economy (AEE) is pleased to provide these brief post-conference comments. Our comments reiterate key themes raised by stakeholders during the conference and can be summarized as follows:

- 1. Without clear policy guidance from the Commission, Florida risks losing out on the benefits of transportation electrification (TE) while potentially increasing costs for customers.**
- 2. The Commission has ample authority to approve utility programs that support the EV charging services market, attract private investment, provide benefits to all utility customers, and enhance the flexibility of the grid. It should leverage this authority to accelerate TE efforts.**
- 3. The Commission need not address all issues surrounding TE; rather, it should focus on areas within its jurisdiction.**

We look forward to working with the Commission and other stakeholders to support the growing EV and EV charging services markets in Florida.

- 1. Without clear policy guidance from the Commission, Florida risks losing out on the benefits of transportation electrification (TE) while potentially increasing costs for customers.**

Throughout the EV Roadmap workshop, stakeholders repeatedly raised the benefits that widespread TE *can* bring to the state. These benefits include but are not limited to: downward pressure on electric rates for all customers by spreading fixed system costs over a greater number of kilowatt-hours sold from EV charging, reduced reliance on imported transportation fuels, flexible load that can avoid or mitigate distribution system upgrades, improved integration of renewable energy resources, and reduced air pollutant emissions – particularly in areas that have historically faced the brunt of transportation emissions.

However, without clear policy direction from the Commission, these benefits may fail to materialize – or materialize at scale – in Florida. In the absence of this Commission guidance, several issues may arise. First, without pricing signals and other management techniques in place, EV loads over time could trigger distribution system upgrade costs for customers that are relatively easy to avoid. Second, the uncertainty regarding the rules of the road will suppress business investment in Florida. Third, EV charging stations may not be adequately deployed in underserved communities and market segments, hindering the state’s ability to serve all populations in a non-discriminatory manner and undermining its efforts to ensure that all consumers have choices and can benefit from the favorable economics that EVs offer.

Based on the projections for EV adoption included in our initial comments submitted on October 2, it is abundantly clear that Florida – in line with national trends – will experience notable market growth over the next decade. EVs are an innovative technology that could yield significant benefits for Florida’s grid and utility customers. Instead of taking a passive approach to transportation electrification and creating additional regulatory risks, the Commission has the opportunity to leverage the advent of EVs to support a more efficient, flexible, and cost-effective grid.

**2. The Commission has ample authority to approve utility programs that support the EV charging services market, attract private investment, provide benefits to all utility customers, and enhance the flexibility of the grid. It should leverage this authority to accelerate TE efforts.**

As several parties raised during the EV Roadmap workshop, utilities, with appropriate guidance from the Commission, are uniquely positioned to help mitigate the potential risks identified above and establish programs that support the growth of the EV charging industry through a range of investment

approaches and ownership models, encourage beneficial EV charging behaviors that create benefits for all ratepayers, and educate customers on the benefits of EV charging and use of electricity as a transportation fuel. The Commission has the authority to solicit and approve utility transportation electrification programs that support the strategic buildout of EV charging infrastructure, “make-ready” infrastructure, approve EV rates that encourage off-peak charging and catalyze additional investment in EV charging stations, and educate customers and prospective participants in these utility programs.

Utility regulators across the country – including in the Southeast – have already authorized such programs and identified where utilities can play an appropriate role in supporting transportation electrification. The Commission has an opportunity to build off of these efforts and approve programs that provide widespread benefits for ratepayers and the state, while supporting the Commission’s mission to facilitate the efficient, safe, and reliable provision of electricity. Implementation of these transportation electrification programs will create new opportunities for the Commission to gain early insights on EV charging dynamics, develop best practices, and improve future EV program designs to better meet grid and customer needs as electrification accelerates. By requiring utilities to regularly collect and socialize data on program performance, the Commission can effectively increase transparency and ensure that utility programs adapt as the EV market evolves.

**3. The Commission need not address all issues surrounding TE; rather, it should focus on areas within its jurisdiction.**

During the EV Roadmap workshop, the Commission raised several important issues related to the deployment of EV charging infrastructure and the EV market at large. These issues included permitting processes and marketing strategies for EV charging equipment. While improvement in these areas is important for facilitating the development of the EV market, AEE respectfully submits that these issues largely fall beyond the Commission’s purview. Local jurisdictions typically have authority to set permitting rules and regulations for electrical equipment and EV charging service providers have traditionally marketed their services to customers without regulatory oversight. While we appreciate the PSC’s effort to develop a comprehensive understanding of the EV charging services market, we recommend that the Commission refine its scope. As utility regulators, the PSC is well-positioned to ensure that utilities are able to meet customers’ evolving energy needs in a manner that creates benefits for the grid. Programs designed to facilitate the deployment of EV charging stations and associated make-ready infrastructure, electricity rates that encourage off-peak charging, and customer education

efforts are all examples of supportive EV strategies within the Commission’s jurisdiction. This refined scope will enable the Commission to focus on areas where it can have the greatest market impact and reduce friction on other issues (e.g., permitting) where other entities hold jurisdiction.

We thank the Commission for the opportunity to participate in its EV conference and provide comments on the utilities’ role in transportation electrification. With proactive planning and coordination among interested stakeholders, the PSC is well-positioned to leverage the growth of the EV market to benefit utility customers, the grid, and society as a whole. AEE looks forward to the Commission’s next steps in this proceeding.

Respectfully submitted,



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