BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Section 339.287, Florida Statutes Electric Vehicle Master Plan for Development of Electric Vehicle Charging Station Infrastructure Along the State Highway System.	)	DOCKET NO. 20200000-OT
	)	FILED: OCTOBER 2, 2020

TAMPA ELECTRIC COMPANY'S
PRE-WORKSHOP COMMENTS

Tampa Electric Company ("Tampa Electric" or "the company"), submits the following Pre-Workshop Comments addressing questions raised by the Florida Public Service Commission ("Commission") Staff in advance of the October 21 2020, Electric Vehicle ("EV") Master Plan for Development of EV Charging Station Infrastructure Workshop. Section I of these Pre-Workshop Comments address the projected increase of EV and ensuring supply to meet the projected growth in a competitive market. Section II of these Pre-Workshop Comments addresses supply development strategies and local, state, and federal support of electric vehicle charging stations. Section III of these Pre-Workshop Comments addresses the necessary regulatory structure of electric delivery, competitively neutral policies, and public utility participation in the marketplace.

I. Projecting EV Increase and Charging Supply

Projecting the increase in the use of electric vehicles in this state over the next 20 years and 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 with ample consumer choice.

A. Please provide a ten-year and twenty-year projection for increased EV use in Florida, including your data source for such projections.

B. Provide an estimate of the number of charging stations that will be needed to meet the demand presented by these ten and twenty-year projections.

1. Tampa Electric has not projected the increased use of EVs for the entire state of Florida. Similarly, Tampa Electric has not estimated the number of EV charging stations that would be needed in the state to support such a projection.

2. To support Staff's request to collect EV projection data within Florida, Tampa Electric is providing the Company's EV projections for the Tampa Electric service territory. The projections provided on the table are based on the Company's most recent Ten-Year Site Plan Supplemental Data Request, and the projection timeline was extended to show the projection over a twenty-year period.

Year	Number of Electric Vehicles	Number of Public EV Charging Stations	Number of Public "Quick-charge" PEV Charging Stations	Cumulative Impact of Electric Vehicles		
				Summer Demand	Winter Demand	Annual Energy
	(-)	(-)	(-)	(MW)	(MW)	(GWh)
2020	5,459	340	63	13.8	5.6	23.1
2021	6,530	386	72	16.2	6.6	27.6
2022	7,815	433	80	18.9	7.8	32.9
2023	9,321	479	89	22.0	9.1	39.2
2024	11,052	525	97	25.3	10.6	46.4
2025	13,049	571	106	29.1	12.3	54.6
2026	15,183	617	115	33.1	14.2	63.5
2027	17,456	663	123	37.3	16.1	72.9
2028	19,869	710	132	41.7	18.1	82.8
2029	22,425	756	140	46.3	20.2	93.4
2030	25,125	802	149	51.1	22.5	104.5
2031	28,013	848	157	56.2	24.8	116.4
2032	31,092	894	166	61.6	27.4	129.1
2033	34,367	940	175	67.3	30.0	142.6
2034	37,840	987	183	73.3	32.8	156.9
2035	41,514	1,033	192	79.6	35.8	172.0
2036	45,419	1,079	200	86.3	39.0	188.1
2037	49,558	1,125	209	93.3	42.3	205.1
2038	53,935	1,171	217	100.6	45.8	223.1
2039	58,554	1,217	226	108.3	49.5	242.1
2040	63,417	1,264	235	116.4	53.3	262.1

Notes
Cumulative counts provided.
The number of public "quick-charge" PEV charging stations is a subset of the number of Public EV Charging Stations.
Home charging load estimated at 20% of residential EV demand at time of summer

II. Charging Station Supply Development, Partnerships and Support

Strategies to 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.

A. Provide comment on strategies to develop the supply of charging stations, including methods of building partnerships between charging station installers, governmental entities, electric utilities, the business community, and the public.

B. Provide examples of strategies adopted or being considered in other states that could be implemented in Florida.

3. EV technologies, including those that support EV charging at home (including multi-unit dwellings), public (including DC fast charging), and for fleet use, continue to rapidly evolve in support of widespread adoption of EVs. The market continues to adapt, and as such, any strategies, particularly at a state level, should be developed with flexibility in mind. Through collaboration with industry organizations, such as Drive Electric Florida, Edison Electric Institute ("EEI"), Electric Drive Transportation Association ("EDTA"), and Clean Cities, Tampa Electric has sought to remain engaged in ongoing conversations about how to support the EV market at the local, state, and national levels. Tampa Electric believes collaboration is necessary amongst state agencies to ensure that all potential impacts and benefits of EV adoption are being identified. The work currently underway to support SB 7018 is a good example of the benefits of collaboration in developing future potential solutions.

4. Near-term strategies should encourage investment from a variety of market participants that helps to not only expand access to charging infrastructure but also supports statewide planning. Equally, utility investments should be encouraged to not only support state and local planning, but also to ensure that utility system planning and grid impacts are properly managed to support a robust EV market. At a minimum, utility pilot programs should be encouraged to develop internal capabilities for supporting market growth and to explore innovative approaches to address customer concerns about utility

construction costs and rate design. Tampa Electric's support for this approach to utilizing utility investment to encourage EV and EV charger market growth is demonstrated through the Company's recently approved petition for approval of waiver of CIAC Rule No. 25-6.064, F.A.C. for new line extensions serving electric vehicle fast charging stations (Docket No. 20200011-EI), and also in the recently filed petition requesting Commission approval of an Electric Vehicle Charging Pilot Program (Docket No. 20200110-EI).

5. Tampa Electric has no suggestions to recommend regarding strategies adopted or being considered in other states. It is important to note, however, that Florida's geography may give rise to unique considerations regarding EVs and their use in the state for which there may not be strategies in other states that can be applied in Florida. For example, the need for infrastructure to facilitate evacuation and return to Florida because of major hurricanes, and the associated damage to charging infrastructure is especially problematic for Florida and is not likely being addressed in other states.

III. Regulatory Structure for Delivery of Electricity to EVs

Identifying the type of regulatory structure necessary for the delivery of electricity to electric vehicles and charging station infrastructure, including competitively neutral policies and the participation of public utilities in the marketplace.

A. Provide comment on the regulatory structure necessary for delivery of electricity to EV charging station infrastructure.

B. Provide comment on what constitutes competitively neutral policies in the electric vehicle charging marketplace.

C. Provide comment on the participation of public utilities in the electric vehicle charging marketplace.

D. Provide examples of regulatory structures adopted, or being considered, in other states regarding electricity supply to EV charging station infrastructure, including examples of competitively neutral policies and the participation of public utilities in the marketplace, that could be implemented in Florida.

6. The regulatory structure necessary for delivering utility service to EV charging infrastructure already exists, however Tampa Electric recognizes that existing policies may not be best suited for expeditiously expanding EV charging infrastructure, which is an important need to spur increased EV adoption. Utility construction costs, in the form of CIAC (charged to customers up front for building primary line extensions to serve DC fast chargers) and monthly demand charges utilized for large customer rate schedules are two examples where regulatory policies may inhibit the growing EV market. Additionally, rate schedules that encourage charging of EVs during off-peak periods may shift charging loads from on-peak periods and result in significant benefits to all rate payers, regardless of whether they own an EV. Consideration should be given, and study undertaken (e.g., through utility pilot programs) to determine the likelihood of such potential benefits, what the value may be to the general body of ratepayer and that they are appropriately accounted for in cost-benefit analyses for future utility programs.

7. Tampa Electric believes 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. With regard to a market that is still relatively new but also expected to grow rapidly, the State of Florida may want to consider policies which encourage participation and investments by all potential market participants, in order to more quickly expand the availability of charging infrastructure or other programs that support the market.

8. Customers already rely on Tampa Electric as a trusted advisor for a wide range of energy-related solutions. Tampa Electric is already seeing this type of outreach from customers related to their consideration of purchasing EVs. Utilities should explore what their appropriate role is in the EV charging marketplace. Through participation in pilot programs under the oversight of the Commission, utilities can develop internal capabilities to support proper system planning for widespread EV adoption, better understand localized grid impacts and benefits, and explore the development of customer-facing programs that support the overall market. Tampa Electric's participation in such a manner will help to inform

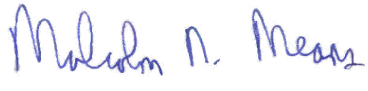
decisions that will have long-term benefits to the state. Long-term needs for utility participation may include addressing concerns about equitable access to charging infrastructure for all communities and proper placement of EV charging along rural travel corridors to help support statewide emergency planning.

9. Tampa Electric believes that Florida's regulated utilities should be encouraged to participate in the EV charging marketplace at this time through pilot programs. The extent of that sort of participation will help to inform long-term decision-making, both for utilities and regulators. Pilot programs or policymaking should remain flexible to ensure utilities can adapt to market needs.

WHEREFORE, Tampa Electric Company submits the foregoing as its Pre-Workshop Comments regarding the various issues to be discussed at the October 21, 2020, EV Charging Station Infrastructure Master Plan workshop.

DATED this 2nd day of October 2020

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Post-Workshop Comments, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 2nd day of October, 2020 to the following:

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