



October 2, 2020

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

- Via Electronic Filing -

Re: 2020 Undocketed File, Docket No. 20200000-OT – Greenlots’ Comments for EV Workshop

Dear Mr. Teitzman:

Greenlots is pleased to submit these comments in response to the Public Service Commission (the “Commission” or “PSC”) Staff’s Request for Comment for EV Workshop/SB 7018 filed on September 2, 2020.

About Greenlots

Greenlots is a leading provider of electric vehicle (“EV”) charging software and services committed to accelerating transportation electrification (“TE”) in Florida, and a wholly owned subsidiary of Shell New Energies. Founded in 2008 and headquartered in Los Angeles, California, Greenlots’ footprint spans across three continents with deployments in 13 different countries.

Greenlots’ software, services and expertise empower industries across the globe to deploy EV charging infrastructure at scale, connecting people in a safer, cleaner, and smarter way. The Greenlots network supports a significant percentage of the direct current fast charging (“DCFC”) infrastructure in North America, and an increasing amount of Level 2 infrastructure. Greenlots’ smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and improve system efficiency.

In Florida, Greenlots provides the software management platform for a number of EV charging stations including those operated by Duke Energy Florida for its Commission-approved “Park and Plug” EV Charging Station Pilot as well as the Electrify America DCFC stations deployed across the state.¹ Greenlots serves on the boards of Drive Electric Florida and the Southeast Energy Efficiency Alliance (SEEA), and additionally is an active member of Advanced Energy Economy

¹ See Florida Public Service Commission, Docket No. 20170183-EI.

and other not-for-profit organizations committed to advancing transportation electrification across Florida, the southeast and beyond.

Comments

Greenlots commends the Commission for its interest in exploring the many important regulatory topics that relate to and impact transportation electrification. Greenlots was a strong advocate for the passage of SB 7018 and for its recognition of the important role that both electric utilities and the Commission have to play for the state to achieve SB 7018's goal to "encourage the expansion of electric vehicle use in this state."²

Greenlots appreciates this opportunity to offer comments to inform the Commission's upcoming EV Workshop. Our comments address Question Nos. II and III, below.

II. 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.*

As a first step in identifying strategies to develop the supply of charging stations, Greenlots encourages Florida to start with building an electrification vision – a collaboratively developed vision and plan for statewide EV charging should identify key goals such as addressing locational needs, power needs and equity considerations. Those goals will then inform what individual strategies to pursue, how to prioritize them, and how to best leverage electric utilities and other stakeholders to achieve them. Moreover, a collaborative approach that brings multiple stakeholders together to develop a plan will facilitate the necessary partnerships to implement it, because those stakeholders will likely already have a sense of familiarity, ownership and support for the plan's goals.

A key area that will benefit from partnership among utilities, state transportation planning authorities and local jurisdictions is the mapping out of a statewide charging network. Such a network should be informed by complementary intrastate and interstate planning processes both at the local level and regionally.

Greenlots notes that when performing a corridor mapping exercise, the weighting given to various factors can significantly impact the result. For instance, if a gap analysis prioritizes serving existing commercial regions and high-travel roads, the results may highlight urban

² See Laws of Florida, Ch. 2020-21 at p. 4.

population centers and may look very different than an analysis that prioritizes locations that lack nearby public charging stations and/or are more rural.

Utility participation is important to inform mapping efforts by bringing to bear utilities' detailed knowledge of grid capacity and constraints that may affect prioritization of locations. This is particularly important given SB 7018's focus on evacuation corridors and resiliency. From recent hurricanes on the Atlantic and Gulf coasts to wildfires on the west coast, the need for resilient systems – including backup power – for transportation has never been more apparent. Indeed, these climate and weather-related power outages have compromised the ability even for emergency responders to access needed fueling infrastructure. The opportunity to pair on-site storage or other backup power with charging stations offers the potential to deliver needed transportation power even during outages, and it is a subject that clearly implicates distribution system planning and the participation of the utility.

Utilities are essential actors to help the state overcome barriers to infrastructure deployment by offering financial incentives to cover the costs of infrastructure and charging stations. As discussed below, utilities are uniquely positioned to deliver this benefit via a range of investment models including utility-owned and operated charging stations, customer rebates, and utility facilitation of make-ready infrastructure (i.e. the wiring, conduit and other supporting infrastructure up to and including the charging stub).

Utilities also have a key role to support fleet electrification. From school buses to transit buses, light duty passenger cars to delivery vans, port ground equipment to Class 8 tractors and much more, fleet electrification is happening, but it is a complex process that involves multiple interrelated considerations. Transitioning a fleet requires much more than simply purchasing the vehicles and charging stations. Utilities can and should support their customers to address a range of issues, such as understanding the electrical capacity at the property, distribution feeder and circuit levels; the additional capacity that may be needed to serve a fleet's needs; the relative cost of bringing sufficient power to different locations; and how leveraging smart charging technology to manage load can minimize the need for capacity upgrades, help avoid peaks and demand charges, and make electrification more economical.

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

Nationwide, a number of regional and statewide charging networks are in various stages of planning, implementation and completion. These include the West Coast Electric Highway, the Michigan to Montana (M2M) I-94 Clean Fuel Corridor, and a recently-announced multi-state midwestern fast charging network.³ This latter example is notable because it is being led not by

³ See West Coast Electric Highway: <http://www.westcoastgreenhighway.com/electrichighway.htm>; Michigan-to-Montana (M2M) I-94 Clean Fuel Corridor: <https://southshorecleancities.org/michigan-to-montana-m2m-i-94-clean-fuel-corridor/>; "Electric vehicles will get a boost for interstate travel with Midwest fast-charger network" (article):

government agencies but by six investor-owned electric utilities (“IOUs”), subject to regulatory approval. The Indiana Crossroads EV Corridor plan takes a similar approach but at a state rather than regional level. That plan involves all five of Indiana’s IOUs, two generation cooperatives and the state’s municipal utilities association joining forces to build out a network of publicly-accessible fast charging stations along the state’s major highways.

In Section IV below, Greenlots cites specific utility proceedings in other states that are instructive examples of recommended approaches for the PSC and the state’s utilities to consider.

III. 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.

Before addressing the specific subquestions below, it will be informative to first offer more context by sharing Greenlots’ broader perspective on the value of transportation electrification and electric utilities’ participation in the EV charging marketplace. At a high level, all ratepayers stand to benefit from transportation electrification, not just those who drive EVs. Ratepayer investment in utility EV charging programs is therefore both appropriate and, indeed, necessary to unlock and amplify these ratepayer benefits.

It is widely accepted that the lack of charging stations is one of the major barriers to EV adoption and TE. Utilities are well positioned to address this barrier by investing in and deploying EV charging stations at scale. Indeed, policymakers and regulators can benefit from the unique role of the utility as a market transformer by leveraging utility investment, ownership and procurement of charging stations to grow the EV charging market, increase competition and advance the market to a state of greater economic sustainability.

Benefits of Transportation Electrification

Transportation electrification represents likely the single greatest opportunity to increase and optimize the utilization of the electric grid to the benefit of all ratepayers, while also reducing emissions and air pollution and delivering significant economic development and cost savings benefits to the state.

More EVs charging on the grid increases electric load, which in turn spreads out fixed system costs across greater usage of electricity, thereby applying downward pressure to rates for all ratepayers, not just EV drivers. A recent analysis by Synapse Energy Economics examined costs and benefits associated with utility support of transportation electrification from 2012 through 2017 by two large investor-owned utilities, Pacific Gas & Electric and Southern California Edison. The study found that those two utilities’ transportation electrification programs realized in

excess of \$500 million in direct revenues, not including broader societal benefits, far in excess of the total costs associated with the programs.⁴ Managing load by incentivizing drivers to charge during off-peak times and by leveraging smart technology significantly amplifies the ratepayer benefits that TE can deliver.

It is widely understood that electrification of transportation reduces emissions and improves health outcomes. The Union of Concerned Scientists (“UCS”), a non-profit and non-partisan research organization, compared emissions from gas-powered vehicles and electric vehicles in Florida by examining several factors such as upstream emissions, electricity generation and transmission loss. Even after factoring in the aggregated emissions involved in producing the electricity an EV consumes, UCS found that a typical EV in Florida emits less than one-third the carbon dioxide than a new gas-powered vehicle — 2.2 metric tons of CO₂ compared to 4.9 metric tons.⁵ This beneficial disparity will continue to grow as more renewable power sources come online and Florida’s generation mix becomes ever cleaner over time.

The cost savings are significant as well. As an example, UCS found that an EV driver in Florida who charges up at home pays the equivalent of \$0.52 per gallon, compared to an average statewide fuel price of \$2.52 per gallon as of June 2019. Moreover, rural drivers stand to gain the most – more than \$748 annually compared to operating a gas vehicle. These savings that result from avoided fuel costs means more money in drivers’ bank accounts, much of which is disposable income that will have a multiplier effect when spent locally and in communities across the state.

It is unnecessary to more completely address these and other additional benefits of TE in these comments, given the State’s already-stated goals to expand EV adoption. However, Greenlots strongly encourages the Commission to recognize that the many benefits of TE – grid optimization, downward pressure to rates, pollution and emissions reduction, health benefits, job creation, economic development and fuel security – do not happen automatically. These benefits require thoughtful and deliberate planning and programs to realize. Leveraging electric utilities to address significant widespread barriers to TE in Florida such as lack of accessible charging infrastructure, high upfront infrastructure costs and a lack of consumer awareness, is therefore both appropriate and necessary.

Challenging economics contribute to a lack of charging stations

One of the most significant and challenging barriers to increased EV adoption is the lack of adequate charging stations, particularly in the context of public charging. It is critical to recognize the fundamental link between charging station visibility, availability, and EV adoption, as it can

⁴ Synapse Energy Economics. June 2019. Electric Vehicles Are Driving Electric Rates Down. <https://www.synapse-energy.com/sites/default/files/EV-Impacts-June-2019-18-122.pdf>

⁵ Union of Concerned Scientists. June 2019. Electric Vehicle Benefits for Florida. https://www.ucsusa.org/sites/default/files/attach/2019/05/State%2520Benefits%2520of%2520EVs_batch%2520_FL.pdf

both confine and slow EV adoption when scarce, or act as a market and EV adoption accelerator when prominently and readily available.

Many consumers disqualify EVs from their purchasing/leasing considerations due to the lack of charging stations and the resulting concern commonly referred to as “range anxiety.” While the market is now seeing more EVs with longer ranges, many currently deployed EVs have relatively smaller batteries that are best situated to support local driving, compounding this issue. Even as EVs with 200+ mile ranges become standard, this will put increased pressure on DCFC stations both along corridors and in urban areas. While the business models for deployment and operation of both L2 and DCFC stations are challenging, the latter has particularly high costs to develop and is arguably the most challenging business model.

With the lens pulled out, this lack of available charging stations, which hinders EV adoption, which in turn perpetuates the challenging economics that contribute to the lack of charging stations, is a classic market failure that warrants public investment and the involvement of regulated utilities. Unfortunately, a sustainable and competitive market in the deployment of public charging infrastructure remains aspirational at this time, and it is unlikely to arise prior to the adoption of a critical mass of electric vehicles. This is primarily due to a lack of a sustainable private market business model for the ownership and operation of public charging stations based on revenues from charging activities. Some property owners who install charging stations may do so as an amenity to attract EV-driving customers whose primary expenditure is not the charging session but rather the purchase of products or services in a convenience store, for example. However, at this point in the market, those corresponding sales receipts remain largely inadequate to cover the costs of installation and operation of the charging infrastructure and stations. Writ large, this dynamic has thus far resulted in a fundamentally inadequate amount of private investment in such charging infrastructure. The unfortunate result is that economics simply don't support sufficient private investment to adequately grow the infrastructure market to support current and future drivers and their adoption decisions.

Competition within the EV charging marketplace

The electric utility is uniquely positioned to serve as a motivated buyer that spurs market competition within the EV charging industry. While some market competition exists between a relatively small but expanding field of sellers of EV charging products and services to motivated investors/site hosts, in certain market segments such as residential and business Level 2 charging, those motivated buyers are relatively few and far between. Those that are participating in the market are often purchasing at a small scale that lacks the value of wholesale-level procurement, and for market segments such as public charging there is not a competitive market for offering these services directly to drivers. This void persists despite significant private capital being invested in technology companies supporting transportation electrification.

Per basic economic theory, no number of competitive suppliers/producers results in a competitive market in the absence of a sufficiently large number of consumers or motivated buyers. So, while there may not be a sufficient volume of EV drivers on the road today to meet this condition, utility investment in charging infrastructure will strengthen the demand side of the equation and directly help accelerate EV adoption and, by extension, the health and growth of the market.

The utility as a market transformer

The electric utility is uniquely positioned to advance the market past these early-stage barriers and accelerate it across a number of key customer segments, supporting competition, improving the environment for private investment, and – notably – serving as a market transformer. In this respect, Greenlots agrees with the inclusive and flexible role the Washington Utilities and Transportation Commission (“UTC”) envisions for utilities, as expressed in its seminal Policy Statement. This view is so salient because it is firmly rooted in a clear understanding of the state of the EV market and EVs, which even today remain an emerging technology. In its Policy Statement, the UTC wrote:

Market transformation is the process of getting these new products to a wider audience, removing market barriers, and exploiting opportunities to make the new market mainstream. For energy efficiency technologies, this is done through programs promoting the product and voluntary efficiency standards. The ultimate goal of market transformation is for the product to become accepted by the general public and adopted into codes and standards.

The challenge facing the expansion of EVs is similar to the challenge facing energy efficiency technologies before market transformation...there are three main barriers to additional adoption of EVs: price, range and charging availability, and low consumer awareness. *Charging availability and consumer awareness, in particular, are barriers that electric utilities are naturally positioned to address.* (emphasis added)⁶

Indeed, when considering the right role for the utility in a broader market context, it is necessary to differentiate between a mature, profitable private market and a nascent, largely pre-profit market that is still in the “emerging technology” stage described by the UTC. Regulatory guiderails that may be appropriate and warranted for a mature market may be inappropriate and even detrimental for a nascent market.

⁶ Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services, *In re Rules in WAC 480-100 Rulemaking to Consider Policy Issues Related to Electric Vehicle Supply Equipment*, WUTC Docket UE-160799, at 29-30 (Issued June 14, 2017) (“UTC Policy Statement”), available at <https://www.utc.wa.gov/docs/Pages/ElectricVehicleSupplyEquipment,DocketUT-160799.aspx>.

Florida's EV charging market cannot realistically be viewed as competitive, if by competitive one means profitable. Despite the enormous value that transportation electrification writ large offers to the grid and ratepayers, as a stand-alone commercial enterprise it remains generally unprofitable to deploy, own and operate EV infrastructure and charging stations today. Electric utilities are uniquely positioned to address this market failure and accelerate the market towards a state of profitability and sustainability.

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

Sale of electricity through an EV charging station should not constitute the utility sale of electricity, and accordingly should be exempt from regulation by the Commission when not provided by a regulated utility. Charging station owners should be allowed to charge for electricity on a per-kilowatt hour ("kWh") basis, by duration of the charging session, or other rate as they see fit.

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

There are several aspects to competitively neutral policies in the EV charging marketplace. These include support for a variety of business models, direct utility procurement, customer/site host choice and interoperability.

When considering competitively neutral policies, it is important to note that the EV charging industry encompasses companies with a diversity of business models, products and services. This is not a one-dimensional market. Some companies own and operate the charging stations; others sell stations and/or software to utilities or site hosts which then own and operate them; and others may do some aspects of both. A range of utility investment approaches that include rebates to customers, utility ownership of make-ready, and utility ownership and operation – and, indeed, procurement – of the charging stations, is therefore vital to support the range of businesses active in the industry and grow the market in a competitively neutral way.

On a broader level, utility ownership of charging infrastructure including charging stations, should not be confused for anti-competitive behavior. Rather, by growing the installed fleet of charging stations, utility investment and ownership will help spark EV purchasing decisions, accelerate adoption and grow the total customer base. This will advance the market closer to an inflection point where asset utilization rates of charging stations can attract greater private investment to sustain a healthy, competitive future market.

Direct utility procurement also supports competition in the market for EV charging products and services. Indeed, there is a prevalent but inaccurate view of the market that competition exists only at the retail level, where naturally-occurring market opportunities are limited. A focus only on the retail or third-party market for charging stations historically has led to less sophisticated

purchasing and planning decisions by customers with little technical knowledge or meaningful negotiating leverage.

The wholesale-level competition that stems from utility procurement of hardware and software introduces a significant, motivated and sophisticated buyer to a market that generally otherwise lacks one and represents the purest form of competition in today's market, based on product features, price, service, etc. and inclusive of a broader value range, including software/management, than the retail market tends to support. This allows different types of players, regardless of size or market position to compete on a leveled playing field. Additionally, wholesale-level competition that results from utility procurement is more likely to drive down program and equipment costs due to purchasing in bulk rather than via individual retail transactions. These benefits of utility procurement apply both to scenarios in which the utility directly owns the charging station and scenarios in which a third-party customer or site host participating in the utility program owns the charging station that the utility has procured.

Customer choice is an important aspect of a competitively-neutral policy. In the context of a utility EV charging program, Greenlots views the utility as a key customer of the EV charging market. The utility should have the appropriate flexibility to design its program and procurement strategy and select its hardware and software partners. The site host should have the choice of whether or not to participate in the utility's charging program, but not to choose for the utility how it should design its EV charging program and procurement strategy or select its hardware and software partners. However, many utilities choose to position the benefitting site host as the decision-maker for hardware, software, and more, often following some form of pre-approval; or indeed, pursue a portfolio of programs that include a range of decision-makers, including both the utility and site host.

Interoperability is another important principle with multiple benefits in the context of TE, including supporting the growth of the market in a competitively neutral manner. This notion of interoperability applies to many aspects of the charging ecosystem: hardware/software interoperability, vehicle-to-charger interoperability and network-to-network interoperability are three key examples. By comparison, proprietary systems – whether referring to a not-widely adopted charging plug, subscription-only access to a charging network, or lack of portability across networks – challenge the driver experience and hamper the industry's collective efforts to accelerate adoption. Interoperability supports a better driver experience by facilitating seamless charging across vehicles, charging hardware and software providers.

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

Public utilities have several important roles to play to grow and support the EV charging marketplace. These include:

- Supporting the growth of the competitive EV charging market through direct ownership and procurement of infrastructure, including charging stations and management software.
- Owning, operating and maintaining charging stations in good working order – an important yet often undervalued aspect of utility ownership to support EV adoption and grow the market.
- Identifying suitable locations for grid connections and working with property owners to address related issues.
- Helping to identify resiliency strategies and backup power planning.
- Serving as a collaborative partner to property owners, fleet managers and other stakeholders to help understand and transition towards electric vehicles and infrastructure.
- Educating customers. Utilities often have longstanding trusted relationships with their customers and should leverage those to communicate helpful information about EVs and EV charging.
- Incentivizing drivers to charge during off-peak times through rate design such as whole house or EV-only TOU rates.
- Leveraging software and smart charging technology to further manage load more optimally.
- Increasing EV adoption by offering incentives for EVs and charging stations
- Establishing standards for utility-financed stations that support interoperability
- Facilitating the deployment of the make-ready infrastructure up to and including the charging stub.

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.

The value of transportation electrification to ratepayers and the importance of utility investment are becoming increasingly understood and recognized by the stakeholder community and regulators, and a number of approved EV programs across the country are a testament to this. One approach that some commissions have taken in other states is to lead a broad-based stakeholder process resulting in stakeholder-supported frameworks for the participation of utilities in planning and building out EV infrastructure.

In Maryland, the Public Service Commission initiated a Public Conference in 2017 titled “Transforming Maryland’s Electric Grid” to ensure its grid “is customer-centered, affordable, reliable and environmentally sustainable.”⁷ As part of this process, the commission established

⁷ Maryland Public Service Commission. Transforming Maryland’s Electric Grid (PC44).
<https://www.psc.state.md.us/transforming-marylands-electric-grid-pc44/>

an EV Working Group comprised of a range of stakeholders including electric utilities, EV charging companies, non-governmental organizations and private citizens. That collaborative process resulted in all of the state's IOUs jointly proposing a Statewide EV Portfolio, with broad support from the stakeholders that participated in the process. The commission approved a modified version of the joint utilities' proposals that included utility ownership, operation and procurement of charging stations, and noted in its order that:

...where private companies have been unable or unwilling to make initial capital investments in difficult and underserved areas, utility ownership can help reach these market segments faster.

The Commission finds that the Utilities have resources, electrical connectivity, and the technical bandwidth within their service territories to address emerging challenges impacting the grid as a result of EV charging on a mass scale. The Utilities can also leverage their customer relationships to educate and advertise EV ownership to potential buyers. Furthermore, the Utilities will also be responsible for ensuring that public charging stations are working and maintained in good working order.⁸

In Minnesota, the commission opened an Inquiry into Electric Vehicle Charging and Infrastructure in December 2017 "in order to facilitate EV integration in a manner consistent with the interests of the public and of ratepayers," and similarly involved a wide range of interested stakeholders in the process.⁹ The commission's order affirmed that transportation electrification serves the public interest and offers numerous benefits, and further that:

Electric utilities have an important role in:

- Facilitating the electrification of Minnesota's transportation sector through policies and investments that educate customers on the benefits of EVs and enhance the availability of charging infrastructure; and
- Optimizing the cost-effective integration of EVs through appropriate rate designs, policies, and investments that improve system utilization/efficiency and *benefit utility ratepayers, including non-EV owners* (emphasis added).¹⁰

Following this February 2019 order, the Minnesota commission approved a number of utility EV filings. This past August, the commission approved Otter Tail Power's proposal to "own and operate a backbone fast charging network for its service territory, including the DC Fast

⁸ Order No. 88997, MPSC Case No. 9478 (issued Jan. 14, 2019).

⁹ Minnesota Public Utilities Commission. Electric Vehicles. <https://mn.gov/puc/energy/electric-vehicles/>.

¹⁰ *Id.*

Chargers.”¹¹ Otter Tail Power’s proposal is designed to ensure that 97% of its customers are within 30 miles of a DCFC station, and 100% are within 60 miles.

Last year, the Minnesota commission also approved Xcel Energy (“Xcel”)’s \$14.4 million proposal for a utility-owned fleet EV charging pilot. Xcel proposed to install, own and maintain the service connection and infrastructure costs, and, if requested by a participant, the charging stations as well.¹² The Commission found that the pilot advances the “goal of increasing transportation electrification in a manner that reasonably limits potential rate impacts, while presenting an opportunity for ratepayers and the public to benefit,” and it approved Xcel’s recovery request totaling \$1.894 million in EV service connection costs; \$9.853 million in EV supply infrastructure and charging equipment costs; \$575,000 for installation management; and \$2.073 million in advisory services, outreach, program management and IT costs.¹³

Other notable commission-led processes include those in Arizona, in which the commission took the step of directing the state’s regulated utilities to develop a statewide transportation electrification plan; Oregon, in which the commission, through two orders, required utilities to submit filings to accelerate TE and to support the legislature’s “expansive” vision for TE; and the aforementioned Washington UTC process.¹⁴

Both Washington’s and Maryland’s commission-led processes have led to the formation of ongoing stakeholder workgroups. Each workgroup serves a constructive role by providing initial review and feedback on utility proposals before the commission takes up the filing for consideration. In both instances, the workgroups’ feedback and staffs’ perspective inform the commissions’ deliberations, but neither commission delegates its decision-making authority to the workgroup. Indeed, while stakeholder workgroups can be useful to identify areas of consensus and foster compromise, agreement can remain elusive on certain issues, and the commission itself remains the body statutorily entrusted with the authority to approve or deny filings.

Some other examples of approved EV programs that recognize the value of utility ownership and operation of charging stations to accelerate EV adoption and grow the EV charging market in a competitively neutral way include Avista Utilities and Puget Sound Energy in Washington State,¹⁵

¹¹ Staff Briefing Papers, *In re Matter of Otter Tail Power Company’s Request for Approval of Electric Vehicle Charging and Infrastructure Programs*, Minnesota PUC Docket No. E017/M-20-181 (Aug. 27, 2020).

¹² Petition of Xcel Energy, *In re Matter of Xcel Energy’s Petition for Approval of Electric Vehicle Pilot Programs*, Minnesota PUC Docket No. E-002/M-18-643 (filed Oct. 12, 2018).

¹³ Order, *In re Matter of Xcel Energy’s Petition for Approval of Electric Vehicle Pilot Programs*, MPUC Docket No. E-002/M-18-643 (issued July 17, 2019).

¹⁴ See Arizona: Decision No. 77238 issued in Docket No. RU-00000A-18-0284 (ACC July 19, 2019); Oregon: Order No. 16-447 issued in Docket AR 599 and Order No. 19-134 issued in Docket AR 609.

¹⁵ See Avista Utilities: Order No. 01 issued in Docket No. UE-160082 (WUTC Apr. 28, 2016); Puget Sound Energy: Item No. A3 issued in Docket No. UE-180877 (WUTC Dec. 13, 2018).

Duke Energy Florida,¹⁶ Pacific Gas & Electric (PG&E) in California,¹⁷ and Pacific Power and Portland General Electric (PGE) in Oregon.¹⁸

Conclusion

Greenlots commends the Commission for its ongoing interest in transportation electrification, appreciates this opportunity to offer these comments, and looks forward to continuing to participate in this proceeding and others.

Sincerely,



Josh Cohen
Director, Policy

¹⁶ See Order No. PSC-2017-0451-AS-EU issued in Docket No. 20170813-EI (FPSC Nov. 20, 2017)

¹⁷ See Decision No. 19-11-017 issued in Case No. A-18-07-020 (CPUC Nov. 7, 2019)

¹⁸ See Pacific Power: Order No. 18075 issued in Docket No. UM-1810 (PUCO Feb. 27, 2018); PGE: Order No. 18045 issued in Docket No. UM-1811 (PUCO Feb. 16, 2018) and Order No. 19385 issued in Docket No. UM-1811 (PUCO Nov. 7, 2019)