

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Friday, April 30, 2021 12:46 PM
To: 'ablair@seealliance.org'
Cc: Consumer Contact
Subject: FW: SEEA Public Comment Docket No. 20210016-EI
Attachments: SEEA_DEF_EV_Support_FLPSC_2021_04_30.pdf

Good Afternoon, Ms. Blair.

We will be placing your comments below in consumer correspondence in Docket No. 20210016, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you!

Toni Hover
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6467

From: Anne Blair <ablair@seealliance.org>
Sent: Friday, April 30, 2021 10:48 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: Aimee Skrzekut <askrzekut@seealliance.org>
Subject: SEEA Public Comment Docket No. 20210016-EI

April 30, 2021

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Submitted via email to: clerk@psc.state.fl.us

RE: Docket No. 20210016-EI, re: Petition for limited proceeding to approve 2021 settlement agreement, including general base rate increases, by Duke Energy Florida, LLC (DEF) and related consolidated dockets

Dear Chairman Clark and Commissioners,

On behalf of the Southeast Energy Efficiency Alliance (SEEA), we submit the following (also attached) for public comment in **Docket 20210016-EI**, specifically in response to the transportation electrification (TE) component of the settlement agreement.

We express our support for Duke Energy Florida's (DEF) proposed electric transportation program to expand their electric vehicle investments as outlined in the settlement agreement. SEEA is a 501(c)(3) organization working to optimize the use and impact of energy to enhance the quality of life in the Southeast so that all people in the region live and work in healthy and resilient buildings, utilize clean and affordable transportation, and thrive in a robust and equitable economy. In our work across 11 states in the Southeast, we work closely with communities, utilities and businesses, to understand, evaluate and design initiatives that will effectively make TE available for and to the benefit of everyone in our communities.

The proposed transportation electrification (TE) program included in the settlement agreement offers an important opportunity for increasing TE in Florida. DEF has successfully deployed their Park and Plug pilot program over the past several years providing important benefits to Duke Energy customers and visitors to the state, as well as testing use cases for grid benefits and optimization. During the same time, the overall market for TE has grown across the state, making Florida the top southeastern state in electric vehicle (EV) adoption. The additional investments that DEF is proposing, including a residential EV Non-Time of Use ("Non-TOU") credit program, Commercial & Industrial ("C&I") customer charging stations, installation of 100 Company-owned DC Fast Charge stations and associated tariff with help fill critical gaps for customers today and those expected in the future.

Today, there are multiple business models and types of EV charging operations that are supporting the market. To meet the growing demand of this industry, we will need "all hands on deck." Utilities serve and will continue to serve, along with private industry, in building, maintaining and operating reliable electrical infrastructure to support customers. Utility programs, in particular, however, also provide an invaluable service deploying charging infrastructure where customers and those traveling through Duke Energy's territories need it most, improving driver confidence and extending benefits to a broad range of customers. In many cases, the private sector may not be well positioned to be able to meet the needs and locations with low usage.

Therefore, the Commission should encourage multiple market development models and not preclude the opportunity for DEF to own and operate DC fast charging assets. Through DEF's program, not only will drivers and Duke Energy customers benefit, but these programs will help increase overall demand for EVs and support all EV charging companies. It will also help the state keep pace with the increasing demand for the expansion of transportation electrification, for individual consumers, businesses and fleets.

The rapidly growing EV vehicle and EV infrastructure market will be large enough, in our view, to support both DEF and the private third-party EV providers. Utility EV programs like those of DEF also provide benefits to help reduce customers' overall energy costs since average electricity prices are lower than average gasoline and diesel prices thereby saving customers hundreds of dollars per year. Moreover, studies of actual load profile data show that, when managed effectively, rate-based utility programs create downward pressure on utility customer rates over the long term by increasing total revenue requirements compared to fixed costs of the utility.

We recognize that, as one would expect, stakeholders have different perspectives and legitimate issues that are often debated in other States and jurisdictions. But we believe that issues like this in no way justify rejecting or otherwise delaying DEF's program. We monitor EV programs in other States offered by utilities, and EV service

providers, and believe these DEF programs to be balanced, reflecting best practices, and are well in the mainstream of approved programs.

Florida is indeed fortunate to be attracting many different types of EV charging market participants that collectively represent a range of business models. Florida needs all of these approaches to build out its EV charging network. SEEA commends DEF for designing its EV Program incentives in a balanced way that leverages multiple approaches, including utility ownership and operation, to expand EV charging access for more Floridians in a timely and equitable way. Therefore, we recommend that DEF's program be approved as proposed *and* that Commission continue to work with the Florida Department of Transportation, the Energy Office and other agencies, utilities, private businesses and other stakeholders on a broader framework for TE, via additional proceedings. Specifically, SEEA encourages the Commission to continue the stakeholder process it began last year with its undocketed EV Workshop, but not to hinder its timely approval of DEF's program in this proceeding.

Thank you for the opportunity to offer these public comments. Please let us know how SEEA can assist the Commission in its consideration of this and other transportation electrification programs that come before the Commission.

If you have any questions, please feel free to contact me at ablair@seealliance.org.

Sincerely,

A handwritten signature in cursive script, appearing to read "Blair".

Anne Blair

Director of Energy Efficient Transportation | Southeast Energy Efficiency Alliance

Cell 404-849-7929 | **E** ablair@seealliance.org





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Sincerely,



Anne Blair
Director, Energy Efficient Transportation