

Antonia Hover

From: Antonia Hover on behalf of Records Clerk
Sent: Tuesday, May 4, 2021 1:47 PM
To: 'mattalford@driveelectricflorida.org'
Cc: Consumer Contact
Subject: FW: Drive Electric Florida Comments in Support of Duke Energy Florida
Attachments: Drive Electric Florida Letter of Support for Duke Settlement.pdf

Good Afternoon, Mr. Alford.

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: Matt Alford <mattalford@driveelectricflorida.org>
Sent: Tuesday, May 4, 2021 1:40 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Drive Electric Florida Comments in Support of Duke Energy Florida

Comments in support of Duke Energy Florida, LLC's rate case are attached.

Matthew Alford
Executive Director, Drive Electric Florida
(850) 556-6487 | www.driveelectricflorida.org



Drive Electric Florida
1679 Clearlake Road
Cocoa, FL 32922



April 30, 2021
Adam Teitzman
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

- Via Electronic Filing -

RE: Docket No. 20210016-EI – Duke Eergy Florida LLC. Petition for Limited Proceeding to Approve 2021 Settlement Agreement

Dear Mr. Teitzman:

Drive Electric Florida ("DEFL") hereby submits this letter of support to the Florida Public Service Commission (PSC) in Docket No. 20210016, Duke Energy Florida, LLC ("Duke") Petition for Limited Proceeding to Approve 2021 Settlement Agreement ("Petition"). Specifically, DEFL believes the transportation electrification (TE) programs proposed by Duke align with and supports state policy objectives to advance the electric vehicle marketplace, and provide benefits to the general body of ratepayers. DEFL takes no position with respect to the other items raised within the 2021 Settlement Agreement.

Drive Electric Florida, a 501(c)(3) nonprofit, is a mission-driven organization composed of a diverse set of stakeholders who work collaboratively in support of programs and policies that accelerate the adoption of electric vehicles in Florida. Our membership includes public, municipal and cooperative utilities; environmental organizations, local governments, regional planning organizations, and electric vehicle charging infrastructure providers - all working together toward a shared vision in support of EV-friendly policies and programs.

Drive Electric Florida believes a multi-pronged approach utilizing a range of business models to deploy, own and operate electric vehicle charging infrastructure is the most credible and assured means to accelerate the growth of the electric vehicle market and the enjoyment of its public benefits. For its part, the 2021 Settlement Agreement proposed by Duke would invest approximately \$63 million over four years in transportation electrification programs with a suite of programs that are, from the regulated utility standpoint, in alignment with Drive Electric Florida's mission and vision.

First, Duke has proposed to continue installing Direct Current Fast Charging (DCFC) stations that it began with its 2017 Park and Plug pilot program at approximately 100 sites, at a targeted cost of \$30 million. The most-cited obstacle to develop electric transportation as an industry is the perceived lack of publicly available electric vehicle charging infrastructure. Access to charging is an essential consideration for a driver or fleet operator when deciding whether to purchase electric vehicles for their personal or business use. While expanding access to charging generally, within the context of promoting equitable electrification programs, it is notable that a



certain percentage of those sites must be located in income-qualified census tracts to serve communities in which the business case for private market investments remains challenging. These costs will be included in Duke's rate base.

From the standpoint of optimizing the benefits EV charging represents to electrical infrastructure and ratepayers, Duke has proposed a new tariff for fast charging to be collected at Company-owned DCFC stations, as well as a residential EV Non-Time of Use (Non-TOU) credit. Residents would be provided an incentive of \$10 a month to charge off-peak, meaning that the same kW/h needed to charge would spread over the same transmission and distribution assets over the course of any given day. As electric vehicle adoption represents a large increase in consumption, this has the significant potential to put downward pressure on rates for all utility customers.

Lastly, the Settlement Agreement proposed by Duke would implement a rebate program targeting Commercial and Industrial charging stations across various market segments - from Level 2 Multi-Unit Dwelling installations to DCFC fleet applications. The rebates as proposed would total \$29 million, for up to 4,830 chargers.

Taken together, this filing represents the most comprehensive attempt to date by a public utility in the Florida market to apply the range of policy instruments at their disposal to facilitate a robust electric vehicle investment ecosystem.

Private charging companies have made an impressive and sustained effort to meet current market demand. These investments are greater than the sum of their parts: increasing access to charging infrastructure will also encourage more of Florida's residents to purchase electric vehicles, resulting in higher utilization and revenues for all providers operating in this market. Given the scope of Florida's geography, as well as the size and diversity of its population, no single market participant could reasonably hope to invest in an adequate, reliable supply of charging stations themselves and utility investment is a net-positive to TE. Distilled to its essence, as the number of participants and companies making investments in electric vehicle charging infrastructure increases, so does the relative value of their individual assets. For this reason, Drive Electric Florida is supportive of well-considered investments to deploy electric vehicle charging infrastructure.

Beyond the transformational economic possibilities of this moment, the dollars and cents of business and markets and money, is the moral imperative to act in a meaningful and substantive manner to combat an existential threat to the future of our species. This letter in support of Duke Energy Florida's proposal is drafted against the backdrop of a warming world, caused by human activities that emit vast amounts of carbon and other greenhouse gasses into our planet's atmosphere. In Florida, as elsewhere, the transportation sector is the single largest contributor to greenhouse gas emissions. As Florida is particularly vulnerable to the devastating consequences of sea level rise caused by anthropomorphic climate change, the need to begin to adopt policies wherever prudent to curb greenhouse gas emissions should be given serious consideration.

Quickly.



In light of these considerations, Drive Electric Florida supports the proposed transportation electrification programs in Duke's filing.

Respectfully Submitted,

Matthew L. Alford

Matthew Alford, Executive Director
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Drive Electric Florida