

Jenae Thornberry

From: Jenae Thornberry on behalf of Records Clerk
Sent: Friday, September 6, 2024 12:57 PM
To: 'jamie@energytariffexperts.com'
Cc: Consumer Contact
Subject: RE: Electrify America's Comment RE Duke Florida Rate Case Comment, Case No. 20240025

Good afternoon Jamie Tosches,

We will be placing your comments below in consumer correspondence in Docket No.20240025, and forwarding them to the Office of Consumer Assistance and Outreach.

Thank you.

Jenae Thornberry

Commission Deputy Clerk I
Florida Public Service Commission
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From: jamie@energytariffexperts.com <jamie@energytariffexperts.com>
Sent: Friday, September 6, 2024 12:33 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: 'Willingham, Anthony' <Anthony.Willingham@electrifyamerica.com>; 'Davis, Rhiannon' <Rhiannon.Davis@electrifyamerica.com>; 'James Bride' <jim@energytariffexperts.com>; 'Hoffman, Elisia' <Elisia.Hoffman@electrifyamerica.com>
Subject: Electrify America's Comment RE Duke Florida Rate Case Comment, Case No. 20240025

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Hello Director Teitzman:

Please find Electrify America's enclosed comment regarding Duke Florida's rate case, Case No. 20240025. I am submitting this on behalf of Anthony Willingham, AICP, Government Affairs & Public Policy Lead—State Government at Electrify America.

Thank you for your attention to this matter.

Regards,

Jamie Tosches
Vice President – Energy Tariff Experts
(508) 365-4410



September 6th, 2024

Adam Teitzman, Director
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak. Blvd.
Tallahassee, FL 32399-0850
clerk@psc.state.fl.us

Via Electronic Filing

Re: Docket No. 20240025 – Petition for Rate Increase by Duke Energy Florida, LLC

Dear Clerk Teitzman,

On April 2, 2024, Duke Energy Florida (DEF) filed a base recent rate case with the Florida Public Service Commission (“PSC”). In relevant part, the rate case included proposed changes to the General Service – Non-Demand rate to which Electrify America subscribes and a proposal to replace Duke’s Commercial & Industrial Rebate Program with a new Make-Ready program for commercial and residential customers. Subsequently, on July 15, 2024, DEF filed a settlement agreement for review by the Commission on matters at issue in this proceeding.¹ The settlement agreement incorporates DEF’s proposed Make-Ready program as proposed, and authorizes DEF to continue ownership of existing public charging stations without expanding its ownership capacity.² Electrify America submits this letter to comment on the aforementioned topics.

I. Comment

DEF Proposed Rates and Rate Structure: In regards to DEF’s proposed rate increase, as a customer of the utility Electrify America certainly prefers that its rates to remain as low as possible. Nonetheless, Electrify America appreciates DEF’s retention of its General Service – Non-Demand rate structure in its base rate proposal. This rate structure uses a volumetric structure where customers are charged based on their per kilowatt hour usage. It does not have demand charges that stunt development of public direct current fast charging (“DCFC”) stations. Newer public DCFC stations take

¹ In addition to DEF, settlement signatories include the Office of Public Counsel, Florida Retail Federation, Florida Industrial Power Users Group, Nucor Steel Florida, Inc., and White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs.

² Duke Energy Florida, LLC et al Settlement Agreement, Docket No. 20240025, p. 6, lines 18 (July 15, 2024).



time to build driver awareness and EV charging traffic sufficient for a station operator to recover the costs of even moderate demand charges. In most circumstances, demand charges pose a barrier to capital investment in public DCFC stations. Development and proliferation of public DCFC stations is crucial to widespread electric vehicle adoption. DEF itself recognized the importance of public charging structure when it stated that, “[o]ne key takeaway from Park & Plug is that with the growth of the EV market comes greater demand for and utilization of charging infrastructure.”³

In contrast, several of the other Florida utilities serving Electrify America’s stations have rate structures that subject Electrify America’s stations to high demand charges. Electrify America’s Florida footprint includes 29 operating DCFC stations with 238 individual chargers. This operating experience has demonstrated the critical importance of non-demand rates to DCFC station operator business models. As a result, Electrify America views the continued availability of the General Service – Non-Demand rate as a vitally important part of the business case for continued capital investment in charging infrastructure in the DEF service territory. Electrify America’s operating experience in other Florida utilities has demonstrated that moderate to high demand charges are challenging to DCFC station operator business models and poste a barrier to further investment as a result.

Utility Ownership: Electrify America commends DEF for its recognition that the private market is positioned to provide public charging services to EV drivers. In its testimony, DEF explained that it is not seeking to expand its ownership of public charging stations under its Park and Plug program, nor is it planning to deploy new DCFC sites under the “limits of the 2021 Settlement Agreement.”⁴ In explaining its decision, it rightly credited the National Electric Vehicle Infrastructure Program for creating opportunities for the expansion of privately owned public EV charging. The July 15 settlement filed in this proceeding aligns with this proposal as does a recent order issued by the Public Service Commission of Maryland. That Order, issued on August 23, 2024, foreclosed the Maryland utilities from developing new utility-owned public charging stations under existing Phase I programs, and stated that it “does not anticipate approving Phase II proposals for utility-owned charging stations outside of the underserved communities . . .”.⁵ Instead, the Commission invited the utilities to file make-ready proposals in the future.

Make-Ready Program: Electrify America supports the adoption of DEF’s proposed Make-Ready program as contemplated in the July 15 settlement. The settlement contemplates that DEF will publish a make-ready credit EV program incentive calculator on the DEF website and that DEF will make an annual informational filing with the

³ Direct Testimony of Timothy J. Duff for Duke Energy Florida, Docket No. 20240025, p. 6, lines 17-18 (April 2, 2024).

⁴ Id, p. 7.

⁵ Order of the Public Service Commission of Maryland on Electric Vehicle Phase I Evaluation and Next Steps, Case No. 9478, p. 13 (August 23, 2024).



Commission to provide any updates to underlying assumptions and inputs into the make-ready program. Make-Ready programs are an important tool that can complement a state's National Electric Vehicle Infrastructure program. Together with demand charge mitigation, these tools will certainly help spur continued development of privately-owned public DCFC stations.

II. Electrify America's Footprint

Electrify America, the largest provider of hyper-fast chargers—those offering charging speeds of up to 350kW—in the U.S. The company is investing more than \$2 billion over 10 years in Zero Emission Vehicle infrastructure, education and access. This investment will enable millions of Americans to discover the benefits of electric driving and support the build-out of a nationwide network of ultra-fast community and highway chargers that are convenient and reliable. To date, Electrify America has built a coast-to-coast network of DCFC stations across over 900 locations and with over 4,100 individual DC fast chargers in total.

We appreciate the opportunity to submit these comments and the Commission's thoughtful consideration of the issues before it in this proceeding.

Respectfully submitted,

/s/ Anthony Willingham, AICP

Government Affairs & Public Policy Lead—State Government

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