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# Public Service Commission

October 29, 2015

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COMMISSION  
CLERK

Mr. Jeffrey A. Stone  
Beggs & Lane Law Firm  
P.O. Box 12950  
Pensacola, FL 32591

**Re: Staff's First Data Request in Docket No. 150210-EI – Gulf Power Company's Petition for Approval of Depreciation Class and Rates for Electric Vehicle Charging Infrastructure**

Mr. Stone:

Staff has completed its initial review of Gulf Power Company's petition filed in the above referenced docket. Please find the enclosed questions arising from staff's initial review. Please file your responses to Staff's First Data Request be filed in this docket on or before December 2, 2015.

Should you have any questions, or need further information, please do not hesitate to contact me at (850) 413-7005.

Sincerely,

A handwritten signature in black ink, appearing to be "JW".

Jenny Wu  
Economic Analyst  
Division of Economics

Attachment

cc: FPSC/Office of Commission Clerk  
FPSC/Danijela Janjic  
Office of Public Counsel  
Gulf Power Company/Robert L. McGee, Jr.

**Staff's First Data Request**

1. Please refer to paragraph 3 of Gulf Power Company (Gulf or Company)'s petition.
  - a. When does Gulf anticipate that it will begin to deploy electric vehicle (EV) charging infrastructure?
  - b. Please complete the table below summarizing the number of EV charging stations that Gulf envisions it will install within the next ten years.

	No. of EV Charging Stations
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	
2024	

- c. In what type of customer premises (e.g. residences, parking lots of commercial customers, public parking areas, etc.) does Gulf anticipate deploying its EV charging infrastructure?
    - d. What type of EV charging infrastructure does Gulf intend to install?<sup>1</sup>
    - e. Please provide an estimated capitalized cost for a single EV charging station. Please describe how Gulf developed its estimated cost.
    - f. Does Gulf anticipate a need for additional distribution infrastructure based on the estimated number of stations identified in Gulf's response to Question No. 1.b.?
2. For EV charging infrastructure that Gulf anticipates deploying:
  - a. Please provide diagrams or photos of the EV charging infrastructure proposed under its petition for depreciation account classification and rate assignment.
  - b. Please identify the major infrastructure components.

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<sup>1</sup> The National Electrical Code categorizes electric vehicle chargers broadly into three types with the electric load in the range of: 1.1-1.8 kW (Level 1), 3.3 kW (Level 2), 6.6-19.2 kW (Level 2+), and 50-150 kW (Level 3). Details may be referred to pages 10 – 11 of the report:  
[http://www.psc.state.fl.us/utilities/electricgas/electricvehicles/09\\_06\\_2012/Electric\\_Vehicle\\_Charging\\_Report.pdf](http://www.psc.state.fl.us/utilities/electricgas/electricvehicles/09_06_2012/Electric_Vehicle_Charging_Report.pdf)

- c. Does the Company anticipate that each of the different components identified in Question No. 2.a. will have a same design life? Please explain.
  - d. Does the Company anticipate to install the infrastructure itself, or through contracts?
3. Please see the following excerpt from the FERC's Electric Uniform System of Accounts, found at <http://www.ferc.gov/enforcement/acct-matts/usofa.asp>.

**371 Installations on customers' premises.**

This account shall include the cost installed of equipment on the customer's side of a meter when the utility incurs such cost and when the utility retains title to and assumes full responsibility for maintenance and replacement of such property. This account shall not include leased equipment, for which see account 372, Leased Property on Customers' Premises.

Items

- 1. Cable vaults.
- 2. Commercial lamp equipment.
- 3. Foundations and settings specially provided for equipment included herein.
- 3. Frequency changer sets.
- 4. Motor generator sets.
- 5. Motors.
- 6. Switchboard panels, high or low tension.
- 8. Wire and cable connections to incoming cables.

Note: Do not include in this account any costs incurred in connection with merchandising, jobbing, or contract work activities.

- a. Please indicate whether the Company believes all the components of the EV charging infrastructure (plant) proposed under its petition for inclusion in Account 371, per its response to Question No. 2 above, meet all the requirements of Account 371 as specified above. If not, please explain.
- b. Please link the Item descriptions above to each type of EV charging infrastructure (plant) Gulf Power Company anticipates deploying and recording in Account 371.

- c. If applicable, please identify all EV charging infrastructure (plant) that Gulf anticipates deploying and recording in Account 371 that does not fit into any of Items 1 - 8 above.
    - d. For any plant listed in response to Question No. 3.c., please specify how Gulf's request for Commission approval of a depreciation rate for such plant is consistent with Rule 25-6.0436(3)(a), F.A.C. If further subcategorization is contemplated, please specify.
4. In paragraph 4 of its petition, Gulf requests the Commission to approve a fifteen (15) year life for a new class of depreciable asset referred to as "electric vehicle charging infrastructure" to be booked in Account 371.
  - a. Please explain the basis for Gulf's assumption of 15-year service life for EV charging infrastructure.
  - b. Please cite and identify any estimates, studies, or sources that support 15-year service life for EV charging infrastructure.
  - c. By what authority is a new class of depreciable asset titled "electric vehicle charging infrastructure" established?
5. In paragraph 4 of its petition, Gulf requests the Commission to approve a net salvage of zero percent (0%) for EV charging infrastructure booked in Account 371.
  - a. Please explain the basis for Gulf's assumption of zero net salvage value of EV charging infrastructure proposed under its petition for inclusion in Account 371.
  - b. Please cite and identify any estimates, studies, or sources that support a net salvage value of zero for EV charging infrastructure.
6. Is Gulf aware of any price regulated electric utility, in the United States, which currently books depreciation of EV charging infrastructure? If the response is affirmative, for the identified depreciation account(s):
  - a. Please identify the account number and its associated description.
  - b. Please identify the average service life.
  - c. Please identify the average net salvage.
7. Why Gulf believes EV charging infrastructure should be considered a rate base item and/or investment? Please provide the rationale.
  - a. Does Gulf envision instances where contributions in aid of construction (CIAC) will be assessed for EV charging infrastructure? If so, please discuss.

- b. Does Gulf envision instances where CIAC will not be assessed for EV charging infrastructure? If so, please discuss.
  - c. What types of customers or rate classes does Gulf envision will be the primary recipients of its EV charging services?
  - d. Under what sections of Gulf's tariff does the Company anticipate filing for approval of changes in rate and service to accommodate the EV charging installations?
  - e. Through which recovery mechanism does Gulf plan to seek recovery of the costs of the installations of the EV charging infrastructure?
  - f. Which revenue and expense accounts does Gulf believe will be impacted in a future filing, if known?
8. As part of its 2010 Demand Side Management Plan filed in Docket No. 100154, Gulf implemented an Energy Select Electric Vehicle Pilot Program. In its 2010 Demand Side Management Plan, Gulf additionally stated that it would "complete an end-of-pilot evaluation of program results, including a survey of customer satisfaction."
- a. As indicated in Exhibit JLT-2 filed in conservation clause,<sup>2</sup> Gulf's Energy Select Electric Vehicle Pilot Program ended in 2014. Please provide Gulf's end-of-pilot program evaluation of program results, if it is available, for the Energy Select Electric Vehicle Pilot Program.
  - b. Per the brief Program Description contained in Exhibit JLT-2, the Energy Select Electric Vehicle Pilot Program is mainly designed for the residential customers. Will the EV charging infrastructure proposed under Gulf's petition in the instant case expand to other customer classes?
9. Please describe in detail whether a competitive market for EV charging infrastructure exists in the United States and what efforts, if any, Gulf has undertaken to assess such a market.

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<sup>2</sup> Exhibit JLT-2, page 45, ECCR 2014 Est/Act & 2015 Projection, Docket No. 140002-EG.