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April 17, 2019

VIA ELECTRONIC FILING

Mr. Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Application for Limited Proceeding to Approve 2017 Second Revised and Restated Settlement Agreement, Including Certain Rate Adjustments, by Duke Energy Florida, LLC; Docket 20170183-EI*

Dear Mr. Teitzman:

Enclosed for filing, please find Duke Energy Florida, LLC's Motion to Approve Re-Allocation of Electric Vehicle Charging Station Pilot Segments.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me at (727) 820-4692.

Sincerely,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmck
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for limited proceeding to approve
2017 Second Revised and Restated Settlement
Agreement, including certain Rate Adjustments, by
Duke Energy Florida, LLC

Docket No. 20170183-EI

Filed: April 17, 2019

**DUKE ENERGY FLORIDA’S MOTION TO APPROVE RE-ALLOCATION
OF ELECTRIC VEHICLE CHARGING STATION PILOT SEGMENTS**

Duke Energy Florida, LLC (“DEF”), pursuant to Rule 28-106.204(1), Florida Administrative Code and Paragraph 17.a.ii. of its 2017 Revised and Restated Settlement Agreement (“2017 Settlement”), hereby moves for approval to re-allocate segments of its Electric Vehicle Charging Station Pilot Program (“Motion”). In support, DEF states as follows:

1. The 2017 Settlement was approved in this docket by Commission Order No. PSC-2017-0451-AS-EU. The 2017 Settlement, among other things, authorizes DEF to purchase, install, own, and support Electric Vehicle Service Equipment (“EVSE”) at certain customer locations. Exhibit 7 of the 2017 Settlement sets forth certain numeric requirements for different segments of customer locations (i.e., Multi-unit dwellings or MUD, workplaces, “Long dwell time” public locations, and DC Fast Charging Depots). Paragraph 17.a.ii. of the 2017 Settlement also provides, in relevant part: “In the event that DEF is unable to find willing host sites for a given segment, program expenditures may be shifted to other segments identified in Subparagraph 17.b. or new segments identified by DEF, as approved in advance by the Commission.”

2. DEF’s goal is to have as many installations of EVSE completed by the end of 2019, to maximize the information it gathers during the pilot program. However, DEF has found it challenging to meet the minimum number of EVSE set forth in Exhibit 7 for the MUD segment. As explained in more detail in the whitepaper included as Attachment A to this Motion (and incorporated herein by reference), DEF has seen limited subscription of the MUD market segment.

This is due in large part to the limited number of common parking spaces that are available at MUD locations, which limits the number of EVSE that DEF can deploy at a single location. DEF has also experienced a delay in the approval of the required Site Host Agreements, given that an MUD Board must typically approve these agreements.

3. By contrast, other segments are fully or nearly fully subscribed, and DEF expects to receive additional applications in those other segments. The details of these other segments are included in Attachment A. To meet the 2019 schedule, DEF therefore requests approval to shift some of the EVSE assigned to the MUD segment from MUD to Workplace, Public L2, and DC Fast Charging. The chart below summarizes the current allocations and the requested reallocations:

Requested Reallocations					
Segment	MUD - Multi Unit Dwelling	Workplace	Public L2	DCFC	Totals
Original (per Exhibit 7)	325	100	75	30	530
Revised	210	140	130	50	530
<i>Segment Percentage range target for reallocation of MUD ports</i>		20-50%	20-50%	10-30%	

4. DEF also requests that, if by December 31, 2019, DEF does not have subscriptions for the full 210 EVSE assigned to the MUD segment, that DEF be allowed to reallocate the remaining unsubscribed MUD EVSE to the other segments, so that the percentage ranges shown in the table above are maintained. Thus, DEF can quickly re-allocate any remaining unsubscribed EVSE to the other segments consistent with the percentage ranges shown above. The percentage ranges are more fully described in Attachment A.

5. DEF respectfully requests that the Commission consider and approve its Motion as soon as possible, via a Proposed Agency Action (“PAA”) so that DEF can quickly begin to redeploy the segments and install the EVSE.

6. Pursuant to Rule 28-106.204(3), DEF has conferred with the signatories to the 2017 Settlement and can represent that the Office of Public Counsel, the Florida Retail Federation, and SACE have no objection to the Motion, PCS White Springs takes no position on the Motion, and DEF has not received a response from the Florida Industrial Power Users Group.

WHEREFORE, DEF respectfully requests that the Commission approve the reallocations of EVSE as noted in paragraphs 3 and 4 above.

This 17th day of April, 2019.

Respectfully submitted,

/s/ Dianne M. Triplett

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Duke Energy Florida, LLC
Docket No.: 20170183-EI
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 17th day of April, 2019.

/s/ Dianne M. Triplett

Attorney

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ATTACHMENT A

Requested Reallocation of Minimum Port Requirements - Florida Settlement EV Pilot

Overview

The Duke Energy Florida (DEF) Park & Plug (P&P) program began installations in September of 2018 with a goal to deploy a minimum 530 electric vehicle (EV) charging stations as defined in the 2017 Second Revised and Restated Stipulation and Settlement Agreement ("2017 Second RRSSA"). The 2017 Second RRSSA required DEF to deploy the EV charging stations at various market segments, but DEF was afforded the ability to petition the Florida Public Service Commission ("Commission") to reallocate stations among the market segments, if needed.

Application activity through date of this report shows that the Public L2 segment is fully subscribed and has a waiting list for 25 ports. The table below also shows the Workplace segment at 73% subscription and DC Fast units will fully subscribe by mid-year 2019. Multi-unit Dwellings ("MUD") has not shown the same level of interest and is currently only 19% subscribed. Obtaining applications from the MUD segment remains extremely challenging.

DEF's goal is to get as close to 100% installed as possible by end of 2019. Maximum installation within 2019 provides a network of more available units for a longer period of time within the pilot period that will produce utilization data to inform both DEF and the Commission. To help achieve this goal, DEF is proposing that the number of ports be reallocated as shown in the table below. DEF notes that it is also proposing another reallocation if, by the end of 2019, it still has not subscribed the revised number of MUD ports. This will give DEF flexibility to respond to changing market forces.

Requested Reallocations					
Segment	MUD - Multi Unit Dwelling	Workplace	Public L2	DCFC	Totals
Original	325	100	75	30	530
Revised	210*	140	130	50	530
<i>Ports subscribed</i>	62	73	76	14	221
<i>Segment Percentage range target for reallocation of MUD ports</i>		20-50%	20-50%	10-30%	

*MUD Ports not subscribed for by 12-31-2019 will be allocated to remaining segments based on percentage of revised ports in each segment. Ranges shown above based on 340 ports total for non-MUD segments. Workplace (140/340 = 41%), Public L2 (130/340 = 38%) DCFC (50/340 = 15%)

Multi-Unit Dwelling (MUD) Segment

MUD Outreach - In an attempt to increase MUD applications, outreach has been a combination of leveraging contacts with management companies and outbound email. Increased interest is encouraging, however, does not appear to be in numbers needed to support installation of 325 ports within the next year or longer.

DEF initiated 4 separate mailings to our database of MUD customers in an attempt to fill our application pipeline. Results of mailings:

- Total application links sent = 1919
- Applications started = 46
- Applications still active = 26 (active means activity within last 2 weeks and have higher probability of completion)
- Applications received = 7

Outbound calling to click-troughs did not yield any applications to date.

DEF believes there are two main drivers to the limited subscription of the MUD market segment:

- (1) Limited available parking spaces - Most condos and a large number of apartment complexes have assigned parking and only a few spots that are common area parking spots. DEF regularly asks MUD applicants if they can take more than one or two ports, but the maximum number of ports for which an applicant has applied is 4 ports.
- (2) Site Host Agreement lead times/Installed Port yields - DEF requires that an applicant for any EV charging station execute a Site Host agreement (SHA) before DEF engages its electrical contractors for installation of ports. The SHA for MUD installations typically must be approved by an MUD Board, and the average time for approval has been three months or longer. Because most MUD applicants only include two ports or less per site (given the parking space issue discussed above), DEF expects that, to meet the current subscription requirement set forth in the 2017 Second RRSSA, DEF would need to execute an SHA with a minimum of an additional 100 MUD applicants. DEF expects that this would extend the time frame to get all necessary MUD installations completed well into 2020.

Workplace Segment

DEF forecasts that this segment will be fully subscribed by the end of the second quarter 2019. DEF has received applications as a result of word of mouth and outreach from DEF Large Account Managers/Community Relations Managers.

The Department of Energy Workplace Challenge conducted a study that shows employees with access to workplace charging are 6 times more likely to adopt an electric vehicle.¹ Accordingly, DEF believes that shifting market numbers from MUD to workplace meets the intent and purpose of the 2017 Second RRSSA, which is to maximize EV adoption to allow DEF to study its impact.

¹ "Department of Energy Workplace Charging Challenge, Progress Update 2016: A new sustainable commute" Dept. of Energy 2016 - One in 56 partners employees drive a PEV, while the national average is one in more than 324 employees. Ratio derived from June 2016 cumulative PEV sales ("Light Duty Electric Drive Vehicles Monthly Sales Updates," Argonne National Laboratory, www.anl.gov/energy-systems/project/light-duty-electric-drive-vehicles-monthly-sales-updates) divided by 151,097,000 members of the workforce in June 2016 ("Data Tools," Bureau of Labor Statistics, data.bls.gov/cgi-bin/surveymost).

Workplace charging can also be a good alternative for those who live in MUD as an opportunity to charge their vehicles at work.

In addition, because many Workplace installations include multiple ports at a single workplace, DEF has been able to more quickly fill the subscription limits. This is in contrast to the MUD process, which as described above tends to be limited given the limitations on parking spaces.

Public Level Two Segment

There is significant interest in the Public Level 2 (“L2) charging segment; DEF is fully subscribed for available ports using the allocation set forth in the 2017 Second RRSSA. DEF has created a wait list for Public L2 applications (currently 25 ports are on the waitlist, and that number is expected to grow).

As with Workplace, a single SHA can yield up to 20 ports for installation across more than one segment (e.g. Public L2 and DC Fast Charging).

DEF is also obligated under the 2017 Second RRSSA to install at least ten percent of the ports in low income communities. Thus far, DEF has installed 23 ports in low income communities, and they are all part of the Public L2 segment. Without approval of the requested reallocation, DEF may not be able to meet its ten percent requirement. Although DEF has actively sought applications for MUD, it has not received any applications from communities that would meet the low income requirement.

DC Fast Charging Segment

DC Fast Charging (“DCFC”) is a key segment of DEF’s EV pilot, as more all-electric vehicles with larger battery sizes are available on the market and more sites are needed to facilitate cross-state EV travel.

DEF seeks to install at least two units per site for redundancy if one unit is off-line or in use. An increase in DCFC units allows for multiple unit installation per site and increases potential number of targeted DCFC sites in the service territory.

Note that installation of multiple units per site lowers our per port costs for DCFC. The install costs for DCFC are higher than Public L2 due to higher power requirements. Multiple DCFC installs into a site can help dilute fixed install costs for panel upgrades, conduit and DEF internal engineering costs to support the DCFC installation.