

**Jacob Veaughn**

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**From:** Jacob Veaughn on behalf of Records Clerk  
**Sent:** Wednesday, March 31, 2021 12:23 PM  
**To:** 'justin.wilson@chargepoint.com'  
**Cc:** Consumer Contact  
**Subject:** FW: Docket No. 20200220-EI: Comments of ChargePoint  
**Attachments:** 20200220-EI Final ChargePoint Comments.pdf

Good Morning, Justin Wilson

We will be placing your comments below in consumer correspondence in Docket No. 20200220 and forwarding your comments to the Office of Consumer Assistance and Outreach.

**Jacob Veaughn**

Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
[Jacob.Veaughn@psc.state.fl.us](mailto:Jacob.Veaughn@psc.state.fl.us)  
850.413.6656

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**From:** Justin Wilson <justin.wilson@chargepoint.com>  
**Sent:** Wednesday, March 31, 2021 11:54 AM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Cc:** Shaw Stiller <SStiller@psc.state.fl.us>  
**Subject:** Docket No. 20200220-EI: Comments of ChargePoint

Dear Commission Clerk:  
Please find attached to this email Comments from ChargePoint in Docket No. 20200220-EI

Please let me know if you have any questions.

Thank you,  
Justin

Justin Wilson  
Director, Public Policy  
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March 31, 2021

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

*RE: Docket No. 20200220-EI – Petition of Tampa Electric Company for Approval of Electric Vehicle Charging Pilot Program*

Dear Mr. Teitzman:

Please find attached, for electronic filing, comments of ChargePoint, Inc in response to staff's recommended approval of Tampa Electric's Pilot Program.

If you have any questions or require additional information about this filing, I can be reached at [Justin.Wilson@ChargePoint.com](mailto:Justin.Wilson@ChargePoint.com).

Sincerely,

A handwritten signature in black ink that reads "Justin Wilson". The signature is stylized and cursive.

Justin Wilson  
Director, Public Policy  
ChargePoint, Inc.

### **About ChargePoint**

ChargePoint is one of the world's largest electric vehicle (EV) charging networks, with scalable solutions for charging at home, work, around town, and on the road. With customers that include workplaces, cities, retailers, apartments, utilities, hospitals, and fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app, plugging into a charger, managing the station or analyzing charging data.

ChargePoint delivers scalable solutions that enable businesses to support more drivers, add the latest software features, and expand their electric vehicle and fleet needs with minimal disruption to overall business. Hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light and medium duty and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. ChargePoint products are UL-listed, ENERGY STAR® and CE (EU) certified, and the modular design minimizes downtime and makes maintenance and repair more seamless.

ChargePoint's primary business model consists of selling its smart charging solutions directly to businesses and organizations while offering tools that empower site hosts and station owners to deploy charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven and cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

## **Comments**

ChargePoint thanks the Staff for its memorandum dated March 19, 2021 in preparation for the April 1, 2021 agenda meeting. In the March 19<sup>th</sup> memorandum, Staff discusses several issues related to Tampa Electric Company's (TECO) petition including the structure of the proposed pilot, the status of EV charging infrastructure in TECO's service territory, the pilot objects, pilot cost, accounting treatment, and reporting requirements.

Notably absent from Staff's analysis is any discussion of the impacts TECO's pilot may have on the private market for charging service in its service territory. Senate Bill 7018 from the 2020 legislative session charged the Commission with, among other things, "identifying the type of regulatory structure necessary for the delivery of electricity to electric vehicle charging station infrastructure, including competitive neutral policies and the participation of public utilities in the marketplace."

Since the passage of Senate Bill 7018, the Commission Staff has requested comment specifically on the issue of competitively neutral policies on September 2, 2020 and held a workshop on October 21, 2020. Yet, despite the focus on these issues through the workshop process, there is no focus on these issues in Staff's March 19<sup>th</sup> memorandum. ChargePoint believes the Commission has received clear guidance from the legislature that consideration of competitively neutral policies in the electric vehicle marketplace is an important public policy and consideration of this should be given prior to any approval of pilot or permanent programs by the Commission.

In order to develop competitively neutral policies, it is important to first consider how a competitive market for EV charging services works in practice. In the competitive marketplace for EV charging services, EV charging site hosts select the technologies they prefer in an open market, invest their own capital, seek any incentives available through public agencies or utilities, and, in the case of commercial stations, offer competitive charging services to attract drivers and recoup necessary expenses. For their part, charging hardware, software, and service providers innovate new hardware, software, and service offerings to enable site hosts to choose the products and services that will best meet their needs. These providers compete to offer site hosts the best

products to meet their needs at reasonable cost. In competitive markets, utilities can support site hosts and charging hardware, software, and service providers by developing programs that make it less costly and easier for site hosts to install charging equipment and provide charging services and by utilities encouraging competition in the market, charging providers will develop innovative hardware, software, and services solutions to provide to site hosts. Any analysis of a proposal for EV charging programs should consider how a pilot or program would differ from this competitive marketplace. To date, that analysis has not been completed.

In response to Staff's September 2, 2020 Request for Comment related to the implementation of SB 7018, ChargePoint offered the following principles which should guide the development of competitively neutral policies and any approval for utility programs.

- **Site Hosts Choice in Products:** Because site hosts may choose to have charging equipment installed on their property for a variety of reasons, it is important to give site hosts choices in the charging equipment and charging network utilized on their property. For example, a restaurant along a highly traveled corridor could install charging stations to attract EV drivers for the purpose of increasing food sales or a local business district may provide free charging to encourage drivers to spend more time shopping at nearby businesses. Allowing site hosts the ability to choose equipment and network services that best meet their needs and will help them attract EV drivers is critical to the long-term success of providing robust charging infrastructure in the state.
- **Site Hosts Choice in Pricing:** The pricing of EV charging services should reflect the site host's goals for providing the charging services, as well as, any other core business or organizational goals that could be impacted from offering charging services. Traditional fueling companies may seek to compete only on price and amenities available during charging sessions, retailers may seek to offer charging customers a consistent experience across several cities or states, or a grocer could seek to incorporate EV charging into a rewards program; in all of these examples it is important to allow the site host to be the utility customer of

record and price the charging services in a competitive manner that advances the core organization or business goals.

- **Approved Utility Programs to Support Site Hosts:** Utilities have an important role to support transportation electrification and ensure competitively neutral policies in the electric vehicle charging marketplace. ChargePoint believes the Commission should encourage utilities to bring EV charging programs to the Commission for approval prior to implementation to ensure that programs are designed in a competitively neutral way. By bringing programs to the Commission prior to implementation, site hosts and companies who provide EV charging hardware and services will be able to provide important input on how proposals could impact competition in the marketplace. Additionally, Utilities will be able to ensure that their programs, if approved by the Commission, do not run afoul of Commission policies related to competition neutrality.

Neither these principles nor any other analysis of how the TECO pilot would impact the private market for EV charging services is contained in the March 19<sup>th</sup> memorandum. ChargePoint believes that before TECO's pilot is approved the Commission must understand the impacts this pilot could have on the currently active marketplace for EV charging in TECO's service territory and the State and recommends the Commission direct staff to supplement its March 19<sup>th</sup> memorandum specifically to consider these important issues.