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June 11, 2024

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

RE: Docket No. 20240025, In re: Petition for rate increase by Duke Energy Florida, LLC

Dear Mr. Teitzman:

Please find enclosed the Direct Testimony of Lindsey R. Stegall and Exhibit No. LRS-1 on behalf of EVgo Services, LLC for filing in Docket No. 20240025.

Thank you for your consideration.

Sincerely,

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Counsel to EVgo Services, LLC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Duke Energy Florida, LLC	)	Docket No. 20240025-EI
	)	
	)	Submitted for filing: June 11, 2024
	)	

DIRECT TESTIMONY OF

LINDSEY R. STEGALL

ON BEHALF OF EVGO SERVICES, LLC

JUNE 11, 2024

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EXHIBITS

I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. Please state your name, title and business address.

A. My name is Lindsey R. Stegall. I am a Senior Manager of Market Development and Public Policy at EVgo Services, LLC ("EVgo"). My business address is 11835 W. Olympic Blvd. Suite 900E Los Angeles, CA 90064.

Q. Have you prepared a statement of your experience and qualifications?

A. Yes. My qualifications are included as Exhibit LRS-1 to this testimony.

Q. On whose behalf are you testifying in this proceeding?

A. I am appearing on behalf of EVgo. EVgo is a leader in charging solutions, building and operating the infrastructure and tools needed to expedite the mass adoption of electric vehicles (EVs) for individual drivers, rideshare and commercial fleets, and businesses. EVgo is one of the nation's largest public fast charging providers, featuring over 1,000 fast charging locations across more than 35 states, including stations built through EVgo eXtend™, its white label service offering. EVgo is accelerating transportation electrification ("TE") through partnerships with automakers, fleet and rideshare operators, retail hosts such as grocery stores, shopping centers, and gas stations, policy leaders, and other organizations.

Under its owner-operator business model, EVgo develops, finances, owns, and operates its fast-charging network. EVgo works with site host partners across the country to deploy EV charging solutions at retail locations that are already part of customers' daily routines. EVgo installs the public direct current fast chargers ("DCFC") at no cost to the site host partner. EVgo also maintains the customer relationship with the EV driver, providing a call center that is available to customers 24/7, and is responsible for operations and maintenance of its EV charging network. Today, nearly 40% of EVgo's fast charging stalls are powered by a 350kW charger—

almost double the percentage a year ago—to best serve vehicle models with the most advanced battery technology and high peak charging speeds.

Q. What is EVgo's interest in this proceeding?

A. EVgo is an electric commercial retail customer of Duke Energy Florida, LLC ("DEF" or "the Company"), taking service under the Company's General Service Rates. EVgo currently owns and operates 25 fast-charging stalls in the Company's service territory with plans for expansion across the state.

In this proceeding, DEF proposes to replace its existing Commercial and Industrial Rebates Program ("C&I Rebates Program") with a new Electric Vehicle Make Ready Credit Program ("MRC Program"). DEF also proposes to recover the costs of its proposed MRC Programs from its ratepayers (which include EVgo). Company witness Duff explains DEF's proposed MRC Program and associated costs and revenues in detail, while Company witness Olivier describes the incorporation of the MRC Program into DEF's cost of service.

If the Commission approves DEF's proposed MRC Program, EVgo will pay for the costs of the program through rates and will also be eligible to participate in the program. Further, the success of DEF's proposed TE programs will impact the rates paid by DEF ratepayers in the future. Increased electrification leads to a higher electric load, which distributes system costs across a larger customer base, thereby exerting downward pressure on rates. Therefore, the outcome of this proceeding will directly affect EVgo.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide the Commission, the utility, and stakeholders with the unique perspective of an established owner-operator of EV charging infrastructure with experience in more than 35 states, including Florida, to

ensure the Company's proposed MRC Program will achieve its desired objectives and benefit DEF's customers. In order to achieve those aims, the program must prudently invest ratepayer money and be designed to effectively drive deployment of EV charging infrastructure in the Company's service territory.

EVgo supports the non-residential component of DEF's proposed MRC Program in concept and applauds the Company for proposing an improvement over its existing C&I Rebates Program. However, I recommend certain modest modifications to the program that are necessary to ensure it achieves its objectives and maximizes benefits for DEF's ratepayers.

Q. Please summarize your recommendations to the Commission in this proceeding.

A. EVgo recommends the Commission approve the MRC Program with the following modest modifications:

1. Increase the make ready credit maximum for public DCFC greater than 50 kW to $50,000 per stall.
2. Adjust the MRC Program budget for DCFC greater than 50 kW to reflect EVgo's proposed make ready credit maximum level while continuing to accommodate DEF's forecasted participation levels (a total of 164 DCFC installs greater than 50 kW between 2025 and 2027). This could be accomplished by re-allocating the $22.8 million non-residential budget among the seven different sectors, as opposed to increasing DEF's overall MRC Program budget.

Adopting these recommendations will ensure the MRC Program achieves higher participation rates than the existing C&I rebate program,[1] unlocking greater benefits for DEF ratepayers, while keeping the overall budget constant.

II. BACKGROUND

Q. What is DCFC infrastructure and how does it drive greater EV adoption?

A. Public or commercial DCFC charges a vehicle's battery using direct current at high power, which allows for fast charging in minutes instead of hours. DCFC is well-suited for quick charge needs in and around cities, towns, and suburbs and along high-traffic travel corridors. DCFC stations are located at or near places where drivers live, drive, and shop, including retail locations, restaurants, grocery stores, and other locations where an EV driver will be for 15-45 minutes. By contrast, Level 2 charging typically provides a full charge in 4 to 8 hours and is sought in longer duration, long dwell-time locations such as at workplaces, homes, amusement parks, or other destinations where drivers may spend several hours.

EVgo has found that public DCFC helps drive EV adoption, and therefore increases charging and electric load by serving a variety of drivers' needs. DCFC builds the range confidence of EV drivers, especially on trips between cities or across the country. As the Florida Department of Transportation ("FDOT") notes in its Electric Vehicle Infrastructure Master Plan ("EVMP") released in 2021, range anxiety during longer trips is still a perceived barrier to EV adoption.[2] Public DCFC also plays an important role in dense, urban, and suburban areas where not every home has a driveway, attached garage, or in many cases, any dedicated parking. In fact, according to the International Council on Clean Transportation, apartment-dwelling EV drivers living in multifamily housing rely on public charging for 50-80% of their charging[3] as they typically do not have access to dedicated parking or home charging. Similarly, research from UCLA's Luskin Center shows that 43% of multifamily housing residents rely on DCFC stations for their primary means of charging.[4] Although Florida provides homeowners with the right to install charging stations in their residences,[5] renters, including those living in multifamily housing,

still lack this "right to charge," further exacerbating these drivers' need to access public fast charging. Thus, siting DCFC in community locations near multifamily housing and existing amenities drives EV adoption by providing charging options to drivers that do not own a single-family home.

Q. What definitions are useful to understand when discussing EV charging infrastructure?

A. I aim to clarify EVgo's definitions of certain terms that will appear in my testimony. First, a DCFC *location* is a site with one or more EV chargers serving one or more stalls. A *stall* is a parking space where one vehicle can charge at a time. An EV *charger* is a device that provides electricity to recharge the batteries of EVs. An EV charger may have one or more connectors and the ability to serve one or more stalls. A *connector* includes the cable and plug that connects the charger to the EV. Two stalls may be supported by one EV charger with two connectors that can "power share," providing electricity to two vehicles simultaneously.[6] *Port* is another term that is frequently used but is not consistently defined.

Q. What public interest benefits of TE has the state of Florida recognized?

A. Florida's EVMP explains that TE provides opportunities to transform mobility by providing environmentally friendly and cost effective travel options while promoting energy independence.[7] It notes that electric mobility provides several benefits to both transportation and energy sectors including, but not limited to, reduced greenhouse gas ("GHG") emissions leading to positive environmental impacts; increased energy diversity and independence; zero tailpipe emissions leading to improved air quality, reduction in noise pollution and improved vehicle efficiency; and lower cost of vehicle ownership for households due to lower fuel and maintenance costs.[8]

Q. How does electric vehicle charging benefit utility ratepayers?

A. Electric vehicle charging increases electric load and thereby spreads system costs over a greater volume of customers, causing downward pressure on future rates. DEF witness Duff aptly illustrates this impact in his testimony, where he explains—in the context of the Company's proposed MRC Program— "the ongoing increase in energy consumption will continue to add revenue to the system . . . [t]he resulting downward pressure on rates is a benefit to all customers."[9]

These ratepayer benefits are not just theoretical. A 2020 study by Synapse Economics found that the benefits from TE outweighed the costs for the two utilities in the U.S. with the most EVs—Pacific Gas & Electric ("PG&E") and Southern California Edison ("SCE"). Synapse observed that over eight years, "EV drivers in PG&E's and SCE's service territories contributed **$806 million more in revenues than associated costs**, driving rates down for all customers."[10]

The economic benefits of TE for ratepayers are widely recognized by utilities and public service commissions across the country and several studies have been conducted across the country to quantify these benefits.

Q. Have the ratepayer benefits of TE been quantified for the state of Florida?

A. Yes. In 2019, Duke Energy worked with M.J. Bradley & Associates ("MJB&A") to conduct six state-level analyses "intended to provide input to state policy discussions about actions required to promote further adoption of electric vehicles, as well as to inform internal Duke planning efforts."[11] The study focused on Florida estimated the costs and benefits of increased adoption of plug-in electric vehicles ("PEVs") in the state, including the financial benefits that would accrue to all electric utility customers in Florida due to greater utilization of the electric grid during low load hours and resulting increased utility revenues from PEV charging. The study found that if Florida PEV adoption follows the moderate trajectory assumed by the Energy

Information Administration, $2.2 billion will accrue to electric utility customers in the form of reduced electric bills from TE by 2050.[12] If PEV sales in Florida are high enough to get the state onto a more aggressive trajectory (for example through supportive policies and programs), the study estimates that benefits for utility customers could exceed $21.7 billion for utility customers by 2050.[13] While this study is a few years old, it still illustrates the potential magnitude of ratepayer benefits from increasing TE in the state.

III. MAKE READY CREDIT PROGRAM

Q. What is the purpose of this section of your testimony?

A. In this section of my testimony, I address the Company's proposal to replace its existing C&I Rebate Program with a new MRC Program. As I stated above, EVgo supports the Company's proposal in concept, but recommends certain modest modifications to the program. Below, I will explain my support for the program concept and my recommended modifications. As EVgo is focused primarily on high power charging, I will focus on the portion of the proposal related to public DCFC greater than 50 kW.

Q. Please describe the Company's C&I Rebates Program.

A. The Company piloted the C&I Rebates Program in January 2022 after the Commission's Order approving the 2021 Settlement Agreement. The program provides a rebate to C&I customers that install EV charging stations behind a separate meter. For public DCFC, DEF offers up to $4,195 per charger capable of charging at a dedicated capacity of 50 kW and above.[14]

Q. Has the C&I Rebates Program been successful?

A. DEF states that the program has not been as successful as expected. While the Company originally projected that the program's first two years of operation would

distribute approximately $8.6 million in customer incentives for 1,420 chargers, to date, only 26 EV chargers have been installed through the program with 79 EV charger installations pending.[15]

Q. Why does the Company believe the program has been unsuccessful?

A. One of the reasons the Company states for the minimal participation by its C&I customers is the former requirement that chargers be placed on rate GST-1.[16] The Company also found that some customers did not provide certain requested information required to complete the application process.[17] Importantly, the Company further noted that "participating customer feedback… indicated that participation was negatively impacted because EV charger installation costs were viewed as too high, despite available incentives."[18]

Q. What does the Company propose with regard to the C&I Rebates Program in this proceeding?

A. The Company proposes to deploy the MRC Program as a replacement for the C&I Rebates Program from 2025 through 2027. The proposed MRC Program would provide an incentive, in the form of a credit on a customer's bill or a payment to a contractor, to defray a portion of the EV "make ready" expenses related to the installation of the infrastructure needed to bring safe electrical service to EV charging hardware. This program would be available to nonresidential DEF customers that install at their premises the wiring and circuitry required for a Level 2 or higher-powered EVSE(s). The Company will not own the make ready infrastructure associated with the MRC Program.

Q. What are make-ready expenses?

A. Make-ready expenses refer to the costs of service panels, junction boxes, conduit, wiring and other components necessary to make a particular location able to

accommodate EVSE.

Q. How will the program determine make ready credits for public DCFC greater than 50 kW?

A. DEF notes that for charging installations with more than 50 kW aggregate load, the calculation to determine the maximum credit will be performed on a case-by-case basis using information from the Customer Usage Profile form. The incentive range that would be offered for different power levels is not clear to me based on filings in this proceeding, but Exhibit TJD-1 shows that, for loads greater than 50 kW, the budget allocates up to $20,000 per install for DCFC.[19]

Q. What is the proposed budget and estimated participation level for public DCFC greater than 50 kW?

A. According to Exhibit TJD-1, the budget appears to be designed to support 164 installs between 2025 and 2027 at a total budget of $3,275,354.

Q. How does DEF define "install" with regard to the MRC Program?

A. This term does not appear to be defined, but I interpret *install* to be the equivalent of what I have described as an EV *charger*—a device that provides electricity to EVs which may have one or more connectors and the ability to serve one or more stalls.[20]

Q. What is EVgo's position on the proposed MRC Program?

A. EVgo applauds DEF for proposing a program aimed at supporting deployment of EV charging by defraying make ready costs. Make ready programs have been implemented across the nation and, when well-designed and funded at levels that align with the installed costs of DCFC, have been successful at deploying infrastructure and driving ratepayer benefits. In particular, EVgo appreciates that the MRC Program is agnostic to the EV charging ownership model deployed at a given site,[21] and that the Company has taken steps to improve the offering, such as

increasing the incentive amount per install for public DCFC (relative to the existing C&I Rebates Program) in response to customer feedback.

However, while EVgo supports the general concept of DEF's proposed MRC Program, I am concerned the Company's proposed maximum credit per install for public DCFC greater than 50 kW is misaligned with the costs of installing DCFC[22] and will therefore not meaningfully support DCFC deployment. Despite the Company's clear intention to support deployment of public charging through this improved program design, like the C&I Rebate Program, the MRC Program will likely underperform unless DEF modifies its credit levels. If the program is unsuccessful, DEF ratepayers would be denied the benefits that result from increased charging deployment and accelerated TE.

Q. Please elaborate.

A. Regarding the previous C&I Rebates Program, DEF found that "[t]he magnitude of program incentive amounts for several segments are believed to be insufficient to drive meaningful participation."[23] Unfortunately, the proposed MRC Program does not fully address this issue. In a 2023 study, the National Renewable Energy Laboratory assessed the costs of charging infrastructure to estimate the cumulative capital investment required to deploy a charging network that would accommodate the EVs on the road in 2030. For DCFC, the study estimated the hardware cost for a 150 kW charger ranged from $66,400 to $102,200 per port,[24] while the hardware cost for a 350+ kW charger ranged from $116,400 to $167,400 per port.[25] Additionally, the study estimated the installation costs for a 150 kW charger ranged from $45,800 to $94,000 per port, while the installation costs for a 350+ kW charger ranged from $63,700 to $117,900 per port.[26] Consequently, each port could cost between $112,200 and $285,300, with costs likely in the higher range due to common requirements such

as prevailing wage, Americans with Disabilities Act accessibility, and Build America, Buy America. Table 1 illustrates these costs alongside DEF's proposed make ready credit for DCFC greater than 50 kW.

Table 1.

	150 kW charger	**350+ kW charger**
Hardware Cost	Between $66,400 and $102,200 per port	Between $116,400 and $167,400 per port
Installation Costs	Between $45,800 and $94,000 per port	Between $63,700 and $117,900 per port
Total Costs	Between $112,200 and $196,200 per port (and therefore potentially higher per charger)	Between $180,100 and $285,300 per port (and therefore potentially higher per charger)
DEF Proposed MRC Credit	$20,000 per EV charger	$20,000 per EV charger

Given the magnitude of these costs, I am concerned the Company's proposed $20,000 maximum make ready credit (for EV chargers greater than 50 kW)—which is less than 10% of total DCFC costs—will not spur meaningful participation, creating the risk that the MRC program will end up just as undersubscribed as the existing C&I Rebates Program.

Q. What are the potential consequences of an unsuccessful MRC program?

A. As I have explained previously, an unsuccessful program that deploys fewer DCFCs will result in reduced benefits for ratepayers over the long term. It will also reduce the broader public interest benefits recognized by Florida's EVMP. Further, a utility

program requires ratepayer funding to administer. If DEF's program is not optimally designed and fails to meet its objectives, these annual program costs will be squandered without delivering the expected benefits. This would represent an inefficient use of ratepayer funds, which is contrary to fundamental principles of public utility regulation and the Commission's goals.[27]

Q. Are there other utility make ready programs across the country that efficiently and effectively support DCFC deployment and serve as good examples?

A. Yes. Utility programs across the country have recognized the costs of DCFC hardware and installation and have set their level of utility investment in make ready infrastructure accordingly. For example:

- Rocky Mountain Power in Utah's Electric Vehicle Infrastructure Program[28] provides rebates of $45,000 per single-connector charger and $63,000 per multi-connector charger, covering up to 75% of total charger and installation costs. The program also provides incentives for electrical infrastructure and installation costs up to $50,000 per port for chargers over 125 kW. The program provides a maximum incentive of $500,000 per site.
- Tucson Electric Power's make ready program offers utility investment of up to $40,000 per DCFC connector, covering up to 75% of project costs.[29] The utility has allocated $16.4 million for commercial rebates.
- Xcel Energy in Colorado's EV Supply Infrastructure Program provided make ready infrastructure for 186 privately developed public DCFC with a total budget of $9.63 million between 2021 and 2023.[30] Xcel also has a pending make-ready program proposal that, if approved, would offer a $45,000 make-ready rebate per DCFC connector. If a DCFC location is in a disproportionately impacted community, the program would offer up to

$130,000 per connector in make-ready and charger rebates (depending on power levels).[31]

Q. What do you recommend regarding the proposed make ready program?

A. EVgo recommends the Commission approve the MRC Program with the following modifications:

1. Increase the make ready credit maximum for public DCFC greater than 50 kW to $50,000 per stall.
2. Adjust the MRC Program budget for DCFC greater than 50 kW to reflect EVgo's proposed make ready credit maximum level while continuing to accommodate DEF's forecasted participation level. This could be accomplished by re-allocating the $22.8 million non-residential budget among the seven different sectors, as opposed to increasing DEF's overall MRC Program budget.

Q. Why do you propose a make ready credit of $50,000 per stall?

A. This level of investment considers the costs of public DCFC and will meaningfully drive program participation, improving the program's efficiency and maximizing the benefits to ratepayers. This level of investment is also consistent with other utility programs across the country that have been successful. I suggest a per stall credit instead of a per install or per charger credit because aligning the credit with stall count more accurately reflects the functionality of the deployment. For instance, a four-stall site can serve four EV drivers regardless of the number of chargers, whereas a two-charger site could serve two to four drivers, depending on the number of connectors and stalls associated with the two chargers.

Q. How will the modified MRC Program lead to increased EV adoption?

A. As identified in Florida's EVMP, one key critical barrier to EV adoption is the lack of

charging stations.[32] Adopting my recommended program modifications will help address this barrier by ensuring the program achieves DEF's intended program participation levels and increases the deployment of public DCFC. The greater availability of public charging stations will accelerate EV adoption by increasing consumers' range confidence and improve charging accessibility for drivers living in multifamily housing.

Q. How will the modified MRC Program benefit DEF's ratepayers?

A. As I explained previously, the greater incremental loads created by increased EV adoption and EV charging growth will reduce electric rates over time by spreading system costs across a greater number of customers. Again, Company Witness Duff explains this phenomenon in his Direct Testimony, stating the MRC Program will benefit all customers because "the ongoing increase in energy consumption will continue to add revenue to the system […] without adding cost to the system. The resulting downward pressure on rates is a benefit to all customers."[33] Moreover, MJB&A evaluated the costs and benefits of increased penetration of PEVs in eight states and found that "[e]lectric vehicle charging increases utility revenues as we shift from gasoline use to greater reliance on the electric system. Higher revenues support investment and maintenance of the electric system, benefiting all utility customers, regardless of the vehicle they drive."[34] As I explain previously, MJB&A estimated that $2.2 billion will accrue to electric utility customers in Florida in the form of reduced electric bills from TE by 2050 given a moderate EV adoption trajectory. If policies and programs supporting TE are adopted, such as the modified MRC Program I recommend, electrification will accelerate and could result in benefits exceeding $21.7 billion for utility customers by 2050, according to MJB&A. Again, real world data supports this theory, as a 2020 study by Synapse Economics observed

that over eight years two California utilities saw $806 million more in revenues from EV drivers than associated costs, which drove rates down for all customers.[35]

IV. SUMMARY OF RECOMMENDATIONS

Q. Please summarize your recommendations to the Commission.

A. EVgo recommends the Commission approve the MRC Program with the following modifications:

1. Increase the make ready credit maximum for public DCFC greater than 50 kW to $50,000 per stall.
2. Adjust the MRC Program budget for DCFC greater than 50 kW to reflect EVgo's proposed make ready credit maximum level while continuing to accommodate DEF's forecasted participation level. This could be accomplished by re-allocating the $22.8 million non-residential budget among the seven different sectors, as opposed to increasing DEF's overall MRC Program budget.

Adopting these recommendations will ensure the MRC Program is a prudent and efficient ratepayer investment that drives increased participation compared to the existing C&I rebate program, maximizing the benefits for DEF ratepayers as well as the broad public interest benefits recognized by the state.

Q. Does this conclude your direct testimony?

A. Yes.

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[1] Duff Direct Testimony at 10:23-11:4.
[2] *See* Florida Department of Transportation, *EV Infrastructure Master Plan* at 7 (July 2021), available at: https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/emergingtechnologies/evprogram/fdotevmp.pdf?sfvrsn=b5888a_2.
[3] Nicholas, M. et al., International Council on Clean Transportation, *Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets* at 9 (January 2019), available at:

https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf.
[4] DeShazo and Di Filippo, UCLA Luskin Center for Innovation, *Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers* at 3, 13 (February 2021), available at: https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf.
[5] FLA. STAT. Ch. 718 § 113 (2021).
[6] *See* EVgo Blog, *Simultaneous Charging: Less Equipment, More Happy Customers* (Mar. 8, 2023), available at: https://evgo.com/blog/simultaneous-charging-less-equipment-more-happy-customers/.
[7] Florida Department of Transportation, EV Infrastructure Master Plan at 4.
[8] *Id.* at 5.
[9] Duff Direct Testimony at 20:23:21:3.
[10] *See* Frost, J. et al., Synapse Energy Economics, *Electric Vehicles Are Driving Rates Down* (June 2020), available at: https://www.synapse-energy.com/sites/default/files/EV_Impacts_June_2020_18-122.pdf (emphasis added).
[11] *See* M.J. Bradley & Associates, *Electric Vehicle Cost-Benefit Analysis*, *Plug-In Electric Vehicle Cost Benefit Analysis: Florida* at 19 (January 2019), available at: https://www.erm.com/globalassets/documents/mjba-archive/reports/2019/flpevcbanalysis07jan19.pdf.
[12] *Id.* at ii.
[13] *Id.* at iii.
[14] *See* https://www.duke-energy.com/business/products/ev-complete/charger-rebate.
[15] Duff Direct Testimony at 10:23-11:4.
[16] The Company has since changed that requirement.
[17] The Company plans to develop an online checklist to guide customers before and during the application process to address this.
[18] Duff Direct Testimony at 11:9-11.
[19] Exhibit TJD-1.
[20] EVgo has issued interrogatories in an attempt to clarify DEF's proposal. As of the filing of this testimony, those interrogatories remain pending.
[21] Duff Direct Testimony at 22:2-7.
[22] *See* Levy, J. et al., EVgo, *The Costs of EV Fast Charging Infrastructure and Economic Benefits to Rapid Scale-Up* (May 18, 2020), available at: https://site-assets.evgo.com/f/78437/x/f28386ed92/2020-05-18_evgo-whitepaper_dcfc-cost-and-policy.pdf.
[23] Duff Direct Testimony at 11:21-12:2.
[24] In this case "port" refers to a unit that provides power to charge only one vehicle at a time and therefore is equivalent to my defined term "stall."
[25] Eric Wood et al., rep., *The 2030 National Charging Network: Estimating U.S. Light-Duty Demand for Electric Vehicle Charging Infrastructure* (National Renewable Energy Laboratory, June 2023), https://www.nrel.gov/docs/fy23osti/85654.pdf, at 33.
[26] *Id.*
[27] *See* Florida Public Service Commission, *Mission Statement and Goals of the Florida Public Service Commission*, available at: https://www.psc.state.fl.us/about (accessed June 10, 2024) (stating a goal of economic regulation is to "[e]ncourage efficiency and innovation among regulated utilities.")
[28] *See* Rocky Mountain Power, *Utah Rebates for Business EV Chargers and Make-Ready Projects*, available at: https://www.rockymountainpower.net/savings-energy-choices/electric-vehicles/utah-commercial-incentives.html (last accessed on June 11, 2024).
[29] *See* Tucson Electric Power, *Program details*, available at: https://tepev.clearesult.com/program-details (last accessed on June 11, 2024).
[30] *See* Xcel Energy, *Transportation Electrification Plan, Public Service Company of Colorado, 2021-2023*, available at: https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=926521&p_session_id= (last accessed on June 11, 2024).
[31] Colorado Public Utilities Commission, Proceeding No. 23A-0242E, Decision No. C24-022.
[32] Florida Department of Transportation, EV Infrastructure Master Plan at 7.

[33] Duff Direct Testimony at 20-21.
[34] *See* M.J. Bradley & Associates, *Electric Vehicle Cost-Benefit Analyses*, available at: https://mjbradley.com/sites/default/files/NE%20PEV%208%20state%20Summary%2009nov17.pdf (last accessed on June 11, 2024).

Experience & Qualifications: Lindsey R. Stegall

Ms. Stegall serves as Senior Manager of Market Development and Public Policy at EVgo, where she leads the company's policy and regulatory engagement across the central U.S. In this role, Ms. Stegall works with public utilities commissions, state legislatures, state agencies, and other stakeholders to develop and support policies and programs that help accelerate TE.

Within the last three years, Ms. Stegall served as an expert witness in two Massachusetts proceedings related to the Electric Sector Modernization Plans of Eversource Energy (D.P.U. 24-10) and National Grid (D.P.U. 24-11); a DTE rate case proceeding in Michigan (Case No. U-21297); a Colorado Proceeding related to Public Service Company of Colorado's (PSCo) second Transportation Electrification Plan (Proceeding No. 23A-0242E); an Arizona Public Service (APS) rate case proceeding (Docket No. E-01345A-22-0144); a Nevada proceeding related to NV Energy's Transportation Electrification Plan (Docket No. 21-09006); and a Colorado proceeding related to Public Service Company of Colorado's (PSCo) commercial rates for EV charging (Proceeding No. 21AL-0494E). She also managed EVgo's regulatory engagement in an Oncor Electric rate case in Texas (Docket No. 53601), and transportation electrification plan cases filed by Northern States Power in Minnesota (Docket No. E002/M-22-432), APS in Arizona (Docket No. E01345A-22-0067), NV Energy in Nevada (Docket No. 21-09004), and Rocky Mountain Power in Utah (Docket No. 20-035-34).

Ms. Stegall has more than a decade of experience in the clean energy sector and has been working on transportation electrification policy since 2018. Prior to joining EVgo in 2021, Ms. Stegall served as Manager of Policy and Regulatory Affairs at the Colorado Energy Office (CEO), where she was employed for six years. During that time, Ms. Stegall managed CEO's engagement in energy regulatory proceedings before the Colorado Public Utilities Commission, including several related to transportation electrification and rate design.

Ms. Stegall holds a Master of Business Administration degree in Sustainable Management from Presidio Graduate School and a Bachelor of Arts degree from the University of Colorado.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished by electronic mail this 11th day of June 2024 to the following:

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