Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Reference: 2020 Undocketed File, Docket No. 20200000-OT

Please see below the responses to your 2020 undocketed file docket No. 20200000-OT requested. We are pleased to be part of your process and would be happy to provide answers to any questions you might have.

I. Projecting the increase in the use of electric vehicles in this state over the next 20 years and determining how to ensure an adequate supply of reliable electric vehicle charging stations to support and encourage this growth in a manner supporting a competitive market with ample consumer choice.

A. Please provide a ten-year and twenty-year projection for increased EV use in Florida, including your data source for such projections.

i. OUC does not operate outside the Central Florida region, and will only comment on our growth within its service territory. It may be reasonable to extrapolate these projections across other similarly populated urban areas; however, it is not reasonable for rural areas.

ii. OUC projects its programs will encourage EV adoption in its service territory from its existing 0.3% to 5% by 2025. The utility's service territory has an estimated 800,000 cars; therefore, the goal is to achieve adoption of 40,000 electric or plug-in electric hybrids. This is an accelerated adoption rate from an original conservative prediction of 13,600 cars without a program.

iii. This projection assumes there are no significant deterrents introduced and barriers to fleet adoption are reduced. Examples include:

1. Punitive gas tax alternatives.
2. High charging fees for demand charges or equipment recovery.
3. OEM limiting BEV and PHEV choices in Florida based on lack of "EV-friendly" policy.
4. Not having a consistent approach across utilities to work with national fleet adoptions.

iv. OUC does not forecast beyond five years. However, a conservative estimate that shows 30% year-over-year growth would place the utility at 50,000 in 10 years, or 6% penetration. OUC believes its comprehensive program will push the adoption rate to a 50% increase year-over-year, placing it at a 35% penetration by 2030, or 280,000 cars. This is not unreasonable, considering there will be 200 vehicle model choices available in the next three years and battery life and cost will drop the initial investment to be on par with ICE vehicles, regardless of federal incentives. The largest conversion will occur in the fleet sector once vehicle choices broadens and the total cost of ownership shows significant operational savings.

v. OUC's adoption rates are based on direct data pulls from the Department of Motor Vehicles. At this time, the utility pulls the full list of electric cars throughout Florida.

B. Provide an estimate of the number of charging stations that will be needed to meet the demand presented by these ten and twenty-year projections.
   i. For multi-family residential, the requirements will be to have high-speed charging hubs within a 20-minute drive of each other in urban settings.
   ii. Single-family residential will be covered largely by home charging and workplace charging. OUC anticipates 85% or more of charging will occur in those two locations.
   iii. For long-range commuters and long-range travel, the requirements will be to have high-speed hubs within 50 miles of each other in rural or highway settings.
   iv. OUC's expectation is that eight high-speed charging hubs will cover its territory, each containing a minimum of six high-speed chargers (150kw or more).
   v. OUC does not have enough data to support forward projections for high-speed charging hubs. However, OUC feels that the best source for this data would be to engage Tesla who does have enough data to support a correct ratio of chargers to long range battery electric cars.

II. Strategies to develop the supply of charging stations, including, but not limited to, methods of building partnerships with local governments, other state and federal entities, electric utilities, the business community, and the public in support of electric vehicle charging stations.

A. Provide comment on strategies to develop the supply of charging stations, including methods of building partnerships between charging station installers, governmental entities, electric utilities, the business community, and the public.
   i. OUC believes that a state contract that can be negotiated with multiple charging station vendors would be the most cost-effective approach. This would allow for less time expended by all utilities and municipalities and push for the least-cost solutions.
   ii. Build a relationship with local jurisdictions to create a utility-based permitting process to expedite installations by electric utilities.
   iii. Work with trade groups like Drive Electric Florida to gain insight from their diverse membership that includes utilities, manufacturers, environmental groups and educational groups.

B. Provide examples of strategies adopted or being considered in other states that could be implemented in Florida.
   i. OUC is unaware of successful models outside the State of Florida.

III. Identifying the type of regulatory structure necessary for the delivery of electricity to electric vehicles and charging station infrastructure, including competitively neutral policies and the participation of public utilities in the marketplace.

A. Provide comment on the regulatory structure necessary for delivery of electricity to EV charging station infrastructure.
   i. A consistent high-speed EV rate that allows for recapture of capital investment and potential demand charges is needed.
   ii. Permitting processes should be made consistent across all jurisdictions.
   iii. Fair treatment of EVs is needed in relation to road taxes typically collected at the gas pump. Need data-based calculations that do not penalize EV owners.

iv. Should allow municipal and cooperative utilities to continue to make EV charging decisions at the local level.

B. Provide comment on what constitutes competitively neutral policies in the electric vehicle charging marketplace.
   i. There is a need for clarity in the cost components of EV charging – i.e., consumer should know the energy cost, infrastructure cost, and service charge at the EV charging station. This will let EV owners make informed decisions on where to purchase charging services to ensure a competitive market.
   ii. Should look for state contract, pre-negotiated pricing for EV charging infrastructure among a number of suppliers.

C. Provide comment on the participation of public utilities in the electric vehicle charging marketplace.
   i. This is the best approach to ensure the long-term maintenance and operation of charging stations. There are limited requirements for privately owned stations to be well maintained and operational.

D. Provide examples of regulatory structures adopted, or being considered, in other states regarding electricity supply to EV charging station infrastructure, including examples of competitively neutral policies and the participation of public utilities in the marketplace, that could be implemented in Florida.
   i. OUC is unaware of successful models outside the State of Florida.

Peter Westlake
Program Manager, Electrification
pwestlake@ouc.com
Cell Phone 407-417-7646

CC
Linda Ferrone, Chief Customer & Marketing Officer
Jenise Osani, Vice President, Marketing & New Products