

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Authority to Adjust)	Case No. 19-1750-EL-UNC
PowerForward Rider.)	

In the Matter of the Application of Duke)	
Energy Ohio, Inc. for Approval of Certain)	Case No. 19-1751-GE-AAM
Accounting Methods)	

COMMENTS OF CHARGEPOINT, INC.

I. INTRODUCTION

ChargePoint, Inc. ("ChargePoint") submits these comments regarding Duke Energy Ohio Inc.'s ("Duke") proposed Electric Transportation Pilot Programs ("Pilot" or "Pilot Programs") as part of its Infrastructure Modernization Plan. Duke filed its application on September 24, 2019. The Public Utilities Commission of Ohio ("Commission" or "PUCO") established a procedural schedule through an Attorney Examiner Entry dated March 11, 2020, requesting comments from parties. ChargePoint timely filed a motion to intervene in this proceeding and now submits the following comments on Duke's Pilot Programs.

ChargePoint supports the objectives and framework of the Pilot. As a participant in developing utility electric vehicle ("EV") programs in many jurisdictions, ChargePoint commends Duke's proposed Pilot as a model of prudent utility investment. The Pilot will accelerate EV adoption in Ohio.

Below ChargePoint offers some recommendations for consideration.

II. BACKGROUND ON CHARGEPOINT

A. ChargePoint Overview

ChargePoint is the nation's largest EV charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 111,000 independently-owned charging spots, ChargePoint drivers have completed more than 72 million charging sessions, saving upwards of 309 million gallons of gasoline and driving more than 2 billion gas-free miles.

ChargePoint sells EV supply equipment ("EVSE") and network services that enable EV charging station owners to provide charging services. In almost every case, ChargePoint does not own or operate the equipment. ChargePoint sells charging solutions to a wide variety of customers, including residential EV owners, employers, commercial and industrial businesses, cities and public agencies, ports, schools, public transit, delivery truck fleet operators, and multi-unit dwelling owners. ChargePoint offers a broad array of products and services that can serve light, medium, or heavy-duty electric vehicles.

B. EV Charging Hardware and Network

ChargePoint designs, develops, and deploys residential and commercial AC Level 2 ("L2") and DCFC electric vehicle charging stations, cloud-based software applications, data analytics, and related customer and driver services aimed at creating a robust, scalable, and grid-friendly EV charging ecosystem.

The site host network services offered by ChargePoint enable customers to manage their charging infrastructure using cloud-based software tools. These tools provide the station owner or operator with everything needed to manage and optimize utilization of their charging stations, including online management tools for data analysis, billing and payment processing, load

management, and access control. ChargePoint's network services can similarly be utilized by utilities to enable load management and data analytics more broadly.

Stations connect to ChargePoint over a secure, cellular data network (or Wi-Fi in the case of single-family residential) allowing station owners to manage all their charging operations from a single dashboard. Maintenance and customer service are a priority. ChargePoint offers a comprehensive set of support services, including: a 24/7/365 hotline for station users, parts and labor warranty, site qualification, installation and validation services, and a helpline for site host specific questions.

ChargePoint also offers customers a subscription solution for EV charging called, "ChargePoint as a Service" ("CPaaS"). CPaaS is an easy way for customers to provide charging services because it includes all of the hardware, software, installation, setup and maintenance needed for successful charging. It is similar to "Software as a Service" models, which offer access to smart solutions at a reduced cost through subscription pricing.

III. COMMENTS

A. Summary of Duke's Proposed EV Transportation Pilot

Duke is proposing a 36-month Electric Transportation Pilot Program that seeks to advance deployment of EV infrastructure to meet growing market needs. The Pilot Program includes "make-ready" investments for infrastructure designed to bring power to the charging equipment. "Make ready" refers to the line extension on the distribution side of the meter as well as wiring, conduit, and sub-panels that are often needed to provide power to EVSE located on the customer side of the meter.

Additionally, the Pilot includes a rebate program that would provide a specific dollar amount (depending upon the program) to site hosts for installing qualifying EVSE. Thus, the

make-ready and rebate components each significantly lower cost barriers for customers to install electric vehicle charging stations.

Specifically, the Pilot consists of five programs:

- **EV Fast Charge Program** – The Pilot will fund a minimum of 50 DCFC stations at a minimum of 25 locations by providing a “make-ready incentive up to \$50,000 per location.
- **Electric School Bus Rebate program** – The Pilot will provide rebates up to \$215,000 per electric bus to support procurement of 10 buses, and associated charging stations.
- **Electric Transit Bus Program** – The Pilot will fund make-ready investments to support charging infrastructure for 10 electric transit buses, up to \$30,000 per EVSE.
- **Residential EV Charging Rebate Program** – The Pilot will provide \$500 rebates toward the purchase of Level 2 EV charging equipment for up to 1,000 residential customers. Customers can also earn an additional \$500 over three years by participating in a load management program.
- **Commercial EV Charging Program** – The Pilot will fund make-ready investments for 1,200 total ports at a maximum of \$5,000 per port. The Pilot establishes a 10% target for commercial businesses located in low income areas.

B. ChargePoint Supports the Goals of Duke’s EV Transportation Pilot Program

Utilities such as Duke are well-situated to assist with the deployment of EVSE.

ChargePoint believes that there are three components of effective utility investment to support a long-term, sustainable competitive market:

1. The ability for site hosts to choose among multiple, qualified vendors of charging equipment and networks.
2. Site host operational control of EV charging infrastructure located on their properties, including controls over pricing of the charging service provided to drivers.
3. Private investment in EV charging infrastructure in the form of shared cost with incentives, rebates, or supplemented project funding.

Duke’s EV Transportation program Pilot is consistent with these emerging best practices for utility EV charging programs. Duke states that, “the proposed programs are designed to deploy a foundational level of fast charging infrastructure, research the effects of increasing adoption of different types of electric vehicles on the electric system, research customer EV charging behavior, and ascertain the potential financial and environmental benefits to the state of Ohio.”¹

ChargePoint supports the Pilot because its focus on make-ready investment and consumer rebates will encourage increased adoption and continued innovation, while ensuring the growth of the competitive market. The Pilot reduces installation cost barriers to site hosts, as well as simplifying the learning curve associated with owning an EV. Further, ChargePoint supports the Pilot because it has the potential to deliver benefits for all ratepayers, regardless of whether they own an EV.

First, the Pilot reduces installation cost barriers to site hosts through the combination of make-ready investments and customer rebates. This aspect of the Pilot program will significantly reduce installation costs barriers for site hosts, while still leveraging private investment and choice in charging equipment and services.

Second, the Pilot design also recognizes direct engagement with the charging station site host and potential EV drivers is critical. The Pilot holistically supports EV charging with efforts that encourage charging at home, at work, and in public while also providing education and raising consumer awareness on electricity as a transportation fuel. And, through the Pilot, Duke can qualify equipment to meet certain functional capabilities and provide a list of qualified charging stations to its customers. This will simplify the learning curve associated with buying and fueling an EV.

¹ Testimony of Lang W. Reynolds, Page 3.

Finally, the Pilot has the potential to create value for all ratepayers, including those who do not directly participate in the Pilot Program. Several studies highlight that the expected long-term energy revenues from incremental EV load generally exceeds the costs for the grid to support that load.² According to a NARUC report published in October 2019, EV load that charges during off-peak hours can provide positive net revenue due to the efficient use of the existing electric grid.³ Further, a study by Synapse Energy Economics found that in the territories of PG&E and Southern California Edison, the revenue provided by EV programs exceeded the costs to the electric system by more than 3 to 1.⁴ The addition of new dispersed load during off-peak hours can result in the wider distribution of fixed costs across customers, leading to lower rates for all ratepayers.⁵ In effect, prudent investments in EVSE with increases in energy use exert a downward pressure on unit energy costs that can benefit all utility customers regardless of EV ownership.

C. The Pilot's DCFC Size Requirement Should Be Clarified to Maximize EV Adoption

The Pilot's DCFC component states that "EV Fast Charging locations shall include charging equipment with electrical demand requirements of 100 kW or greater . . ."⁶ It also states that "[e]ach location will include a minimum of 2 Fast Charging EVSE . . ."⁷

ChargePoint requests that these two requirements be read together so as the eligibility requirement for DCFC incentives under the Pilot is as follows:

² See, e.g., E3, *Cost-Benefit Analysis of Plug-in Electric Vehicle Adoption in the AEP Ohio Service Territory*, April 2017. https://www.ethree.com/wp-content/uploads/2017/10/E3-AEP-EV-Final-Report-4_28.pdf.

³ NARUC, *Electric Vehicles: Key Trends, Issues, and Considerations for State Regulators*, at 21 (Oct. 2019) ("NARUC EV White Paper"), available at <https://pubs.naruc.org/pub/32857459-0005-B8C5-95C6-1920829CABFE> (citing Jones et al. "The Future of Transportation Electrification: Utility, Industry and Consumer Perspectives," Lawrence Berkeley National Laboratory (2018), at http://eta-publications.lbl.gov/sites/default/files/feur_10_transportation_electrification_final_20180813.pdf).

⁴ Synapse Energy Economics, *Electric Vehicles Are Driving Rates Down*, at 4 (Feb. 2019), available at <https://www.synapse-energy.com/sites/default/files/EVs-Driving-Rates-Down-8-122.pdf>.

⁵ NARUC EV White Paper at 21.

⁶ Testimony of Lang W. Reynolds, Page 14.

⁷ *Id.*

A minimum of 2 DCFC per location capable of charging a single vehicle at a combined 100 kW.

This clarification reflects a best practice with respect to DCFC design. Actual driving and charging needs at a given location can vary in terms of number of ports and power level (i.e., kW level). Under the recommended design, two EVSE are paired to provide 100 kW or more combined to a single vehicle.

This provides the opportunity to make program dollars go further with respect to number of DCFC ports available for customers (doubling the number of DCFC ports out of the gate). As most vehicles on the road cannot accept charging in excess of 50kW, this requirement will ensure that investments can scale over time and in response to driver needs. The make-ready for these sites can be cost-effectively “future-proofed” to allow for additional ports, or power levels, when appropriate.

D. Any Pilot Modification Proposal Coming Out of the Mid-Term Review Should be Subject to Commission Approval with Input from Stakeholders.

In its filing, Duke proposes a mid-term reporting on the Pilot’s progress, which could include a proposal by Duke, in the context of DCFC, for additional incentives or limited Duke ownership and operation of stations.⁸ The proposed mid-term review of the program has potential to raise important and complex issues that would benefit from Stakeholder review and comment prior to implementation. ChargePoint respectfully requests that any such modifications be subject to input from stakeholders and Commission approval.

IV. CONCLUSION

ChargePoint appreciates the opportunity to comment on Duke's proposed EV Transportation Pilot Program and respectfully request that the Commission consider these comments before issuing an Order in this case. ChargePoint looks forward to continuing to work

⁸ Testimony of Lang W. Reynolds, Page 13.

with the Commission, Duke, and other stakeholders to achieve Ohio's transportation electrification goals by reducing barriers to sustainable and scalable growth in the competitive EV charging market.

Respectfully submitted on behalf of
CHARGEPOINT, INC.



Dylan F. Borchers
Kara H. Herrnstein
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2300
Facsimile: (614) 227-2390
E-mail: dborchers@bricker.com
kherrnstein@bricker.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 15th day of April 2020 *via* electronic mail.



Dylan F. Borchers

elizabeth.watts@duke-energy.com
jeanne.Kingery@duke-energy.com
mkurtz@bkllawfirm.com
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com
mleppla@theOEC.org
ctavenor@theoec.org
mpritchard@mcneeslaw.com
Whitt@Whitt-Sturtevant.com
Fykes@Whitt-Sturtevant.com
Bethany.Allen@igs.com
Joe.Oliker@igs.com
Michael.Nugent@igs.com
James@DunnLegal.com
dparram@bricker.com
Paul@CarpenterLipps.com
Bryce.McKenny@occ.ohio.gov
christopher.healey@occ.ohio.gov
bojko@carpenterlipps.com
nvijaykar@elpc.org

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/15/2020 5:20:27 PM

in

Case No(s). 19-1750-EL-UNC, 19-1751-GE-AAM

Summary: Comments of ChargePoint, Inc. electronically filed by Teresa Orahoud on behalf of Dylan F. Borchers