

June 3, 2020

Tanowa Troupe
Director, Office of Administration
Ohio Public Utilities Commission (PUCO)
180 E. Broad Street
Columbus, OH 43215-3793

RE: Duke Energy Ohio's Electric Transportation Pilot Programs – Case No: 19-1750-EL-UNC

The Alliance for Automotive Innovation,¹ General Motors LLC, Ford Motor Company, Kia Motors Corporation, Hyundai Motor Company, and Mitsubishi Motors R&D of America Inc (collectively referred to as “Joint Automakers”) thank you for the opportunity to provide this letter in support of Duke Energy Ohio's Electric Transportation Pilot Programs. Duke Energy Ohio's proposed program would drive transportation electrification for individuals, fleets, and transit agencies by adding infrastructure for charging in the home, at the workplace, and in public spaces.

Our association and companies are invested in and support the electrification of vehicles, and our companies are working diligently to expand offerings, including plug-in and fuel cell electric vehicles, in a variety of ranges, price points and vehicle types to meet all customers' needs and further the reduction of transportation-related carbon emissions.

Ohio is an important state in the value chain of the automotive industry, with over 305,000 automotive jobs in the state.² Duke Energy Ohio's proposal offers an opportunity for Ohio to keep this workforce strong while growing the electric vehicle (EV) market. Currently, Ohio is in the lower half of states for plug-in and fuel cell vehicles,³ and lack of EV charging infrastructure continues to be one of the main reasons listed by consumers for not purchasing an EV. We are supportive of Duke Energy Ohio's proposed program that will help reduce this as a reason for not purchasing an EV. Delaying approval of this application will only slow the state's response to the need for electrification infrastructure.

The program proposed by Duke Energy Ohio comes at an important time, as it represents an opportunity to increase charging stations and equipment. These are both critical components to building a robust market for electric vehicles and to encouraging people to drive EVs. More specifically, expanding infrastructure will ultimately support an increase in the number of EVs in Ohio.

The proposed program addresses several specific objectives, all of which are important to increasing the amount of electric vehicle infrastructure available to accommodate the growing number of EVs entering the market. We want to specifically comment on Direct Current (DC) Fast Charging, proposed residential rebates and load management programs, and education and outreach. We also see value in school bus and transit electrification given the broad benefits for diverse communities but have no comments at this time on the specific pilots for those sectors.

¹ Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative, and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The newly established organization, a combination of the Association of Global Automakers and the Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country.

² <https://autoalliance.org/in-your-state/OH/>

³ <https://autoalliance.org/energy-environment/advanced-technology-vehicle-sales-dashboard/>

DC fast charging allows EV customers to get a “quick charge,” similar to stopping for gasoline in a conventional internal combustion engine vehicle. Public DC fast charging is an essential part of any charging infrastructure, and can enable a more seamless journey across a state for both residents and visitors while also bringing fast charging capability to additional communities. Duke Energy Ohio’s proposal for 25 “make-ready” dual port sites throughout the state is modest, but a good first step for Duke Energy Ohio to understand the market, site locations, and consumer behavior.

Residential charging continues to be the main charging source for EV customers. Duke Energy Ohio’s proposed \$500 rebate for the installation of qualified L2 electric vehicle service equipment (EVSE) and up to an additional \$500 in exchange for participating in monthly load management events for 1,000 residential units will reduce some of the cost burden of the installation of such equipment for EV customers. Reducing the cost burden of EVSE can also make the purchase of EVs more appealing for potential customers, hence increasing the EV market in Ohio. In addition to providing customer savings, the grid-connected chargers should yield valuable data to inform future efforts.

While residential charging is the main charging source for EV customers, not all EV drivers have access to a home charger. The non-residential L2 incentive proposed by Duke Energy Ohio strikes a good balance between the needs of the distribution grid and the anticipated needs of customers. The make-ready investment approach for non-home charging situations is a good start to making it feasible for all residents to purchase an electric vehicle. The proposal is broad in its allocation for make-ready funding: 600 for public, 200 for multi-unit dwellings, 200 for workplace, and 200 for fleets. We support Duke Energy Ohio’s broad proposal for non-residential L2 charging.

Finally, the inclusion of an “Education and Outreach Plan” is a critical element because utilities have an existing, wide, and broad network for reaching customers. They also have the right level of information to assist customers in understanding important concepts like home charging set-ups, rates, and advantageous times to charge. For example, in the State of California, utilities have long played a role in distributing information, offering competitive charging rates, and working directly with consumers to provide rebates for chargers and charging, all of which result in increased customer awareness and enhanced customer experience; these efforts have greatly contributed to California’s ever-growing EV market. Thus, we cannot underscore enough the importance of implementing a plan for customer outreach as part of Duke Energy Ohio’s proposals.

Given the broad consumer benefits, we urge the Ohio Public Utilities Commission to approve Duke Energy Ohio’s proposed electric transportation pilot program to assist in continuing to move Ohio on a path toward a sustainable energy future. Overall, the pilot programs Duke Energy Ohio has proposed should provide widespread benefits from transportation electrification, and they are designed to provide valuable data to inform future efforts.

Sincerely,

Dan Bowerson
Director, Energy & Environment, Alliance for Automotive Innovation

Jamie Hall
Manager, Advanced Vehicle & Infrastructure Policy, General Motors LLC

Steve Henderson

Manager, Electrification Policy and Projects, Ford Motor Company

Amandine Muskus

Senior Manager, Government Affairs and Branding, Kia Motors Corporation

Julie Herbert

Assistant Manager, Government Affairs, Hyundai Motor Company

Michael Block

Senior Manager, Regulatory Affairs and Certification, Mitsubishi Motors R&D of America, Inc

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/8/2020 9:45:06 AM

in

Case No(s). 19-1750-EL-UNC

Summary: Public Comment of Dan Bowerson, Director, Environment & Energy, Alliance for Automotive Innovation,
electronically filed by Docketing Staff on behalf of Docketing