

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for an Increase in Electric)	Case No. 20-585-EL-AIR
Distribution Rates.)	
)	
In the Matter of the Application of Ohio)	Case No. 20-586-EL-ATA
Power Company for Tariff Approval.)	
)	
In the Matter of the Application of Ohio)	
Power Company for Approval to Change)	Case No. 20-587-EL-AAM
Accounting Methods.)	

**DIRECT TESTIMONY OF BRENDAN KELLEY
ON BEHALF OF CLEAN FUELS OHIO**

April 9, 2021

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

3 A. My name is Brendan Kelley. I serve as the Director of Drive Electric Ohio for Clean
4 Fuels Ohio (“CFO”), located at 3240 W. Henderson Rd. Suite A, Columbus, OH 43220.

5 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
6 **YOUR RELEVANT PROFESSIONAL EXPERIENCE.**

7 A. I joined Clean Fuels Ohio in 2018 and since that time I have led our Drive Electric Ohio
8 initiative, which serves as our comprehensive approach to accelerating electric vehicle adoption,
9 including engagement with utilities. I have presented on transportation electrification trends at
10 conferences and for utility audiences, both generally and among utilities and utility regulators. I
11 have provided input to the National Renewable Energy Lab and other Clean Cities Coalitions on
12 utility transportation electrification programs.

13 Prior to joining CFO, I worked on state and local policy development, largescale
14 volunteer organizing efforts, public education campaigns, and data management and analysis. I
15 earned B.A.s from Oberlin College in Politics and Applied Mathematics in 2007.

16 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE ANY PUBLIC UTILITY**
17 **REGULATOR?**

18 A. No.

19 **Q. ON WHOSE BEHALF ARE YOU FILING THIS TESTIMONY?**

20 A. I am filing this testimony on behalf of Clean Fuels Ohio, an intervenor in this case.

21 **Q. WHAT IS CLEAN FUELS OHIO?**

22 A. Clean Fuels Ohio is a 19-year-old non-profit organization with a mission to make Ohio a
23 cleaner and more prosperous state by supporting the deployment of advanced transportation

1 technology solutions. CFO serves as the officially designated U.S. Department of Energy Clean
2 Cities Coalition for the whole state.¹ We have provided our expertise on deployment of vehicles
3 and recharging and refueling infrastructure to public and private stakeholders on tens of millions
4 of dollars of projects in Ohio. Over the past ten years, we have reduced petroleum consumption
5 by over 193 million gallons through our work with fleets and alternative fuels refueling and
6 recharging stations and certified 105 Ohio “Green Fleets” that have successfully reduced their
7 emissions. Our members include local governments like the City of Columbus and City of
8 Dublin; manufacturers like General Motors, Honda, and Worthington Industries; and fleets like
9 the Central Ohio Transit Authority and United Parcel Service.

10 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

11 A. The purpose of my testimony is to support the Stipulation and Recommendation
12 (“Stipulation”) filed in this docket on March 12, 2021, by Ohio Power Company (“AEP Ohio”).

13 **II. DISCUSSION**

14 **Q. HOW DOES THE STIPULATION ADDRESS TRANSPORTATION**
15 **ELECTRIFICATION?**

16 A. Among other items, Part III.E.16 of the Stipulation calls for AEP Ohio to add new
17 provisions to its Schedule PEV tariff (as reflected in Attachment C) to establish (1) a time-of-use
18 rate for distribution service, open to up to 500 residential customers; and (2) “a pilot provision
19 that will allow new separately metered level 2 or DCFC EV [electric vehicle] charging stations
20 to be billed on non-demand metered rates” where the stations offer public charging, available to
21 up to 500 customers. AEP Ohio also commits to engaging in future discussions with interested

¹ U.S. Department of Energy, Clean Cities Coalition Network, <https://cleancities.energy.gov>.

1 parties regarding these tariffs, occurring at least once per year starting in 2022, to consider
2 potential adjustment of various aspects of Schedule PEV and other matters.

3 **Q. WHAT IS CLEAN FUELS OHIO’S ROLE UNDER THE STIPULATION?**

4 A. Pursuant to Part III.E.16.d of the Stipulation, CFO will provide agreed services and
5 informational resources in support of marketing and education efforts regarding Schedule PEV,
6 such as education regarding the tariff through CFO’s Drive Electric Ohio (“DEO”) initiative.
7 These services may “include the production and dissemination of information about residential
8 charging tariff options to EV owners and operators through multiple channels including auto
9 dealerships, EVSE equipment retailers, and the DEO network of individual EV owners.”

10 **Q. WHY IS CUSTOMER EDUCATION AND OUTREACH REGARDING**
11 **CHARGING OPTIONS UNDER SCHEDULE PEV IMPORTANT?**

12 A. The goal of the residential component of the pilot EV charging tariff is to send a price
13 signal to residential EV owners to charge off-peak in order to both avoid increased distribution
14 system costs resulting from additional on-peak load and to promote rate suppression for all
15 customers by adding load that effectively utilizes existing distribution system capacity. However,
16 most residential customers in Ohio have not previously been exposed to EV charging tariffs,
17 time-of-use rates, or demand charges. Therefore, current and prospective EV owners are unlikely
18 to evaluate and enroll in the residential EV charging tariff unless they are made aware of it and
19 educated about its potential benefits. Because the widespread distribution system benefits of the
20 new load from EV charging will be realized only to the extent that the new load is added at off-
21 peak times, it is vital to vigorously educate the public about the pilot tariff. Fundamentally, the
22 residential component of Schedule PEV will not achieve its intended effects if no customers
23 enroll in the pilot.

Greater enrollment in the residential EV charging pilot will also produce more robust data that the Commission, AEP Ohio, and interested stakeholders can evaluate to determine the efficacy of the residential time-of-use rate as a tool to promote off-peak charging. Such evaluations are important to inform future rate cases and move from a pilot EV charging tariff to one that will be broadly effective in attracting enrollment and encouraging off-peak charging.

Q. WHY IS THIS AN IMPORTANT TIME TO EXPLORE EFFECTIVE TIME-OF-USE CHARGING OPTIONS FOR ELECTRIC VEHICLES?

A. It is urgent to gather this data as soon as possible due to trends in the automobile manufacturing industry. Automakers have committed over \$300 billion to producing EVs, and are on track to bring dozens of new EV models to market over the next one to two years. These models will include new sedans at all price points, as well as pickup trucks and SUVs, opening up the EV market to all types of consumers. Further, analysts expect that EVs will achieve upfront cost parity with internal combustion engine (“ICE”) vehicles in the next three to five years due to declining battery costs. Improvements in battery technology mean that these inexpensive new EVs will also have significant range. EVs are already close in price to ICE vehicles, especially with incentives, and the total cost of ownership of EVs is already lower than ICE vehicles due to lower fuel and maintenance costs. Used EVs are also very affordable, and the used market is growing, particularly as three-year leases of EVs with a reasonable range reach their end. All these factors are likely to lead to a significant spike in EV adoption in the next few years. It is vital that utilities and utility regulators understand which tools are most effective to manage that new load to avoid grid overload and costly upgrades.

1 **Q. WHAT IS THE DRIVE ELECTRIC OHIO PROGRAM?**

2 A. CFO's Drive Electric Ohio initiative² offers powerful platforms to address and overcome
3 numerous, wide-ranging market and policy barriers to accelerating adoption of electric vehicles
4 given that, unlike some other states, Ohio has not set requirements for sales of zero-emission
5 vehicles under the federal Clean Air Act. Through its comprehensive structure and activities,
6 DEO provides a statewide program that is broadly recognizable and accessible to utilities, utility
7 regulators, individual consumers, fleets, local officials, vehicle manufacturers and dealers, EV
8 charger manufacturers and installers, EV advocates, and many other key stakeholders. DEO
9 generally holds more than 50 outreach and education events per year that reach more than 1,000
10 current and prospective EV owners, as well as one to two fleet outreach events per quarter with
11 between 20 and 60 attendees.

12 **Q. HOW DOES CLEAN FUELS OHIO PLAN TO UTILIZE THE DRIVE**
13 **ELECTRIC OHIO INITIATIVE TO EDUCATE CUSTOMERS ABOUT TIME-OF-USE**
14 **EV CHARGING OPTIONS AND PROMOTE ENROLLMENT IN SCHEDULE PEV?**

15 A. In providing agreed services to AEP Ohio, CFO plans to leverage several specific
16 components of the DEO initiative to educate current and prospective EV owners about off-peak
17 charging and the pilot residential EV charging tariff:

- 18 • The DEO program connects with and organizes EV owners and enthusiasts across the
19 state, both to facilitate direct communication with them and to mobilize them to educate
20 other current and prospective EV owners about the benefits of EVs. More than 400
21 members of the network reside in AEP Ohio's service territory.

² Clean Fuels Ohio, Drive Electric Ohio, <https://cleanfuelsohio.org/drive-electric-ohio>.

- 1 • The DEO program engages with auto dealerships to encourage them to sell EVs, train
2 them on best practices, and support their marketing efforts. Partnering dealerships
3 disseminate information to EV buyers that DEO curates and provides. DEO works with
4 over 30 dealerships in AEP Ohio's service territory.
- 5 • Most EV charging companies that sell charging equipment to residential customers in
6 Ohio have joined CFO as members. In addition to EV charging companies, CFO works
7 with many electricians who install EV charging equipment. As a trusted source of
8 information, CFO can efficiently share information and materials that these companies
9 and installers can then pass on to their customers.
- 10 • DEO has worked with multi-family dwelling ("MFD") developers across the state on
11 deployment of charging infrastructure, including administering a Smart Columbus rebate
12 program for MFD chargers.
- 13 • To support EV adoption efforts broadly, DEO has organized a stakeholder committee,
14 made up of a diverse array of pro-EV entities. Coordinating this group provides both
15 reach and expertise for DEO efforts, including providing the capacity to craft and vet
16 materials such as the proposed education program.

17 Overall, this wide-reaching framework provides CFO with a diverse range of avenues to reach
18 current and prospective EV owners, supported by both EV sector and utility rate expertise.

19 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes.

CERTIFICATE OF SERVICE

The e-filing system of the Public Utilities Commission of Ohio will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons listed below via electronic mail on April 9, 2021.

/s/ Madeline Fleisher
Madeline Fleisher

SERVICE LIST

dborchers@bricker.com
eakhbari @bricker.com
cpirik@dickinsonwright.com
wvorys@dickinsonwright.com
todonnell@dickinsonwright.com
whitt@whitt-sturtevant.com
fykes@whitt-sturtevant.com
ccox@elpc.org
rkelter@elpc.org
mpritchard@mcneeslaw.com
rglover@mcneeslaw.com
bmckenney@mcneeslaw.com
bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com
Evan.betteron@igs.com
Fdarr2019@gmail.com
paul@carpenterlipps.com
mjsettineri@vorys.com
glpetrucci@vorys.com
rdove@keglerbrown.com
angela.obrien@occ.ohio.gov
christopher.healey@occ.ohio.gov
john.finnigan@occ.ohio.gov
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
mleppla@theOEC.org

tdougherty@theOEC.org
ctavenor@theOEC.org
dparram@bricker.com
rmains@bricker.com
Bojko@carpenterlipps.com
Donadio@carpenterlipps.com
rdove@keglerbrown.com
John.Jones@ohioattorneygeneral.gov
Steven.Beeler@ohioattorneygeneral.gov
Werner.margard@ohioattorneygeneral.gov
cgrundmann@spilmanlaw.com
dwilliamson@spilmanlaw.com
Stephen.Christ@walmart.com
mjsettineri@vorys.com
glpetrucci@vorys.com
dromig@armadapower.com
glpetrucci@vorys.com
mjsettineri@vorys.com
glpetrucci@vorys.com
little@litohio.com
hogan@litohio.com
dstinson@bricker.com
mwarnock@bricker.com
ktreadway@oneenergyllc.com
jschlesinger@keyesfox.com
azaloga@keyesfox.com
lmckenna@keyesfox.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/9/2021 3:06:22 PM

in

Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Testimony - Direct Testimony of Brendan Kelly electronically filed by Ms. Madeline Fleisher on behalf of Clean Fuels Ohio