

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power )  
Company for Authority to Establish a Standard )  
Service Offer Pursuant to §4928.143, Revised ) Case No. 16-1852-EL-SSO  
Code, in the Form of an Electric Security Plan. )

In the Matter of the Application of Ohio Power )  
Company for Approval of Certain Accounting ) Case No. 16-1853-EL-AAM  
Authority. )

---

**REPLY BRIEF  
by the  
ELECTRIC VEHICLE CHARGING ASSOCIATION**

---

**I. INTRODUCTION**

The Electric Vehicle Charging Association (“EVCA”) now respectfully submits its reply brief. As noted in its initial brief, EVCA is a not-for-profit organization comprised of member-companies representing a vast majority of the competitive electric vehicle charging infrastructure market nationwide. EVCA’s mission is to educate policymakers, stakeholders, and members of the public about the critical role of EV technology, infrastructure, and services. EVCA advocates for policies that will expand clean, electrified transportation.

On November 29, 2017, parties filed their post-hearing briefs in the case dockets listed above. Only the Ohio Consumers’ Counsel (“OCC”) opposes the proposed stipulation. According to OCC, the stipulation does not meet the standard criteria employed by the Public Utility Commission of Ohio’s (“Commission” or “PUCO”) three-prong test.<sup>1</sup> OCC complains about

---

<sup>1</sup> *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan*, Case No. 16-1852-EL-SSO, et al, Ohio Consumers’ Counsel’s post-hearing brief at 3 (November 29, 2017).

several items, including the costs of the proposed case settlement, stating that the “true cost is unknown” despite employing five experts in this proceeding to determine cost.<sup>2</sup> Instead, the OCC experts appear to rely on selective statements in order to make empty points.

EVCA takes issue with OCC’s specific complaints about the rebates to support a pilot deployment of Electric Vehicle (“EV”) charging stations. OCC refuses to acknowledge the portion of the case record demonstrating that: 1. Deployed smart, networked charging stations under this program will provide valuable data to the utility that will assist in future planning and grid management; 2. That charging data and smart charging capabilities will enable grid benefits, which will benefit all ratepayers, and; 3. That this infrastructure will assist in the expansion of clean, electrified transportation, and forward State of Ohio statutory policy goals and Commission. As such, EVCA respectfully requests that the Commission reject the OCC’s complaints and approve and adopt the Stipulation as filed.

## **II. CHARGING STATION INFORMATION**

OCC repeatedly references Barbara Alexander’s testimony to support its conclusion that the Smart City and PowerForward Riders should be rejected.<sup>3</sup> The overall objection is that there is not enough information for the Commission to approve this demonstration project.<sup>4</sup> OCC ignores the testimony of EVCA witness Dr. Abdellah Cherkaoui, who provides significant, supporting testimony on the importance of the proposed demonstration project and provides sufficient support for the structure of the demonstration project. Dr. Cherkaoui notes that utilities are “well-situated” to assist in addressing current obstacles the deployment of charging stations,<sup>5</sup>

---

<sup>2</sup> *Id.*, OCC Post-Hearing Brief at 1 (Nov. 29, 2017).

<sup>3</sup> *Id.*, at 19.

<sup>4</sup> Testimony of Barbara Alexander, p.38, lines 15-16.

<sup>5</sup> Testimony of Dr. Abdellah Cherkaoui, p.9, lines 14-15.

explains how the proposed rebate structure is good for the market,<sup>6</sup> and explains why a site-host should be able to determine pricing of charging services.<sup>7</sup> Contrary to OCC's assertions, this is a demonstration project that will extend beyond AEP Ohio's immediate Columbus service territory.<sup>8</sup> The project is meant to provide further information on how EV Charging stations will be deployed in the future, when there will be even more clean, electric vehicles within AEP Ohio's service territory.

Staff Witness Schaeffer points out that the demonstration project will enable future evaluation of EV charging stations: "This information will allow Staff and other parties to better understand and assess siting considerations and pricing programs to optimize resources and ensure system reliability, which furthers state policy as defined in Chapter 4928.02(A) of the Ohio Revised Code."<sup>9</sup> In addition, and as stated in EVCA's initial brief, the EV charging station demonstration project furthers other state of Ohio Statutory Goals:

"It is the policy of this state to do the following throughout this state: [...] (C): Ensure diversity of electricity supplies and suppliers, by giving consumers effective choices over the selection of those supplies and suppliers... [...] (J): Provide coherent, transparent means of giving appropriate incentives to new technologies that can adapt successfully to potential environmental mandates; [...] (N) Facilitate the state's effectiveness in the global economy."<sup>10</sup>

The EV charging station project certainly forwards these statutory policy goals and the stipulation as a whole meets the PUCO criteria for evaluating a stipulation. Therefore, the Commission should reject the OCC's complaints and approve the stipulation as filed.

---

<sup>6</sup> Id., p.11, lines 3-22.

<sup>7</sup> Id., pp. 13-14, lines 3-22; lines 1-2.

<sup>8</sup> Hearing Transcript, Volume 3, p. 385.

<sup>9</sup> Schaeffer Testimony at p.3, lines 20-21, and p.4 lines 1-2.

<sup>10</sup> R.C.4928.02.

### **III. CONCLUSION**

Based on the foregoing, the Electric Vehicle Charging Association respectfully requests that the Public Utilities Commission of Ohio approve the Stipulation as submitted.

Respectfully submitted on behalf of the

ELECTRIC VEHICLE CHARGING ASSOCIATION

/s/Christopher J. Allwein

Christopher J. Allwein (0084914)

Kegler Brown Hill & Ritter LPA

65 East State Street, Suite 1800

Columbus, Ohio 43215-4294

Telephone: (614) 462-5496

Fax: (614) 464-2634

[callwein@keglerbrown.com](mailto:callwein@keglerbrown.com)

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the Post-Hearing Brief has been served via electronic transmission upon the following parties of record this 21<sup>st</sup> day of December 2017.

/s/ Christopher J. Allwein

Christopher J. Allwein

Counsel for Electric Vehicle Charging Association

## **SERVICE LIST**

[Bojko@carpenterlipps.com](mailto:Bojko@carpenterlipps.com)  
[perko@carpenterlipps.com](mailto:perko@carpenterlipps.com)  
[mfleisher@elpc.org](mailto:mfleisher@elpc.org)  
[cmooney@ohiopartners.org](mailto:cmooney@ohiopartners.org)  
[paul@carpenterlipps.com](mailto:paul@carpenterlipps.com)  
[mleppla@theOEC.org](mailto:mleppla@theOEC.org)  
[tdougherty@theOEC.org](mailto:tdougherty@theOEC.org)  
[lhawrot@spilmanlaw.com](mailto:lhawrot@spilmanlaw.com)  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[charris@spilmanlaw.com](mailto:charris@spilmanlaw.com)  
[ibatikov@vorys.com](mailto:ibatikov@vorys.com)  
[whitt@whitt-sturtevant.com](mailto:whitt@whitt-sturtevant.com)  
[campbell@whitt-sturtevant.com](mailto:campbell@whitt-sturtevant.com)  
[glover@whitt-sturtevant.com](mailto:glover@whitt-sturtevant.com)  
[tony.mendoza@sierraclub.org](mailto:tony.mendoza@sierraclub.org)  
[dborchers@bricker.com](mailto:dborchers@bricker.com)  
[eakhbari@bricker.com](mailto:eakhbari@bricker.com)  
[sechler@carpenterlipps.com](mailto:sechler@carpenterlipps.com)  
[cpirik@dickinsonwright.com](mailto:cpirik@dickinsonwright.com)  
[todonnell@dickinsonwright.com](mailto:todonnell@dickinsonwright.com)  
[wvorys@dickinsonwright.com](mailto:wvorys@dickinsonwright.com)  
[callwein@keglerbrown.com](mailto:callwein@keglerbrown.com)  
[werner.margard@ohioattorneygeneral.gov](mailto:werner.margard@ohioattorneygeneral.gov)  
[Robert.eubanks@ohioattorneygeneral.gov](mailto:Robert.eubanks@ohioattorneygeneral.gov)

[stnourse@aep.com](mailto:stnourse@aep.com)  
[msmckenzie@aep.com](mailto:msmckenzie@aep.com)  
[cmblend@aep.com](mailto:cmblend@aep.com)  
[fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)  
[mpritchard@mwncmh.com](mailto:mpritchard@mwncmh.com)  
[Kurt.Helfrich@ThompsonHine.com](mailto:Kurt.Helfrich@ThompsonHine.com)  
[Stephanie.Chmiel@ThompsonHine.com](mailto:Stephanie.Chmiel@ThompsonHine.com)  
[Michael.Austin@ThompsonHine.com](mailto:Michael.Austin@ThompsonHine.com)  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)  
[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)  
[rick.sites@ohiohospitals.org](mailto:rick.sites@ohiohospitals.org)  
[mwarnock@bricker.com](mailto:mwarnock@bricker.com)  
[rdove@attorneydove.com](mailto:rdove@attorneydove.com)  
[rsahli@columbus.rr.com](mailto:rsahli@columbus.rr.com)  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)  
[ibatikov@vorys.com](mailto:ibatikov@vorys.com)  
[joliker@igsenergy.com](mailto:joliker@igsenergy.com)  
[mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)  
[amy.spiller@duke-energy.com](mailto:amy.spiller@duke-energy.com)  
[Elizabeth.watts@duke-energy.com](mailto:Elizabeth.watts@duke-energy.com)  
[joe.halso@sierraclub.org](mailto:joe.halso@sierraclub.org)

Attorney Examiners:

[Sarah.parrot@puc.state.oh.us](mailto:Sarah.parrot@puc.state.oh.us)  
[Greta.see@puc.state.oh.us](mailto:Greta.see@puc.state.oh.us)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/21/2017 5:25:19 PM**

**in**

**Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM**

Summary: Brief Reply electronically filed by Mr. Christopher J. Allwein on behalf of Electric Vehicle Charging Association