

April 15, 2020

Samuel C. Randazzo, Chairman  
The Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

Re: Support for Duke Energy Electric Transportation Pilot Program, Case No. 19-1750-EL-UNC, *et al.*

Dear Mr. Randazzo:

I write on behalf of Clean Fuels Ohio and request you approve Duke Energy Ohio's application for its proposed Electric Transportation Pilot Program. The pilot's purpose is to study the impact that electric vehicles (EVs) will have on the electric grid and how Duke Energy Ohio can help prepare for their adoption. We support this proposal as it closely aligns with our mission to make Ohio a cleaner and more prosperous state by facilitating the deployment of alternative fuels vehicles.

Specifically, Clean Fuels Ohio supports the four main goals of the pilot, which are to:

- Deploy a foundational level of fast charging infrastructure across the Duke Energy Ohio service territory
- Study the effects of increasing adoption of multiple types of electric vehicles
- Study customer charging behavior
- Ascertain the potential financial and environmental benefits of transportation electrification to the state of Ohio

Clean Fuels Ohio is a non-profit organization dedicated to making Ohio a cleaner, healthier, and more prosperous state. To do this, we:

- partner with organizations to implement advanced fuel solutions and vehicle technologies in their fleets
- collaborate with businesses in the transportation industry
- educate consumers and policymakers about the benefits of alternative fuels vehicles
- help build a statewide fueling and charging infrastructure that supports those efforts
- work to reduce market barriers to deployment of alternative fuels vehicles

For nearly 20 years, Clean Fuels Ohio has been the trusted advisor and collective voice of organizations in Ohio that make and use clean fuels and advanced vehicle technologies and mobility solutions. We have reviewed Duke Energy Ohio's proposal and attest that the program as proposed will address important market barriers and advance understanding of electric vehicle adoption in Ohio.

Many Ohioans, particularly in Duke Energy Ohio's service territory, do not have easy access to home charging because they live in a multi-unit dwelling or because their single-family home only allows for street parking. Dedicated resources for residential charging for multi-unit dwellings, as well as at workplaces and in public, are key components of efforts to address this barrier. Further, providing resources to electrify transit and school buses, expands access to electric vehicles and the benefits that access provides, to a larger population of Ohioans.

So-called “range anxiety” represents one of the greatest barriers to electric vehicle adoption. The deployment of fast chargers along corridors within Duke Energy Ohio’s service territory will be a significant step toward addressing range anxiety.

Ratepayers, utilities, and the grid benefit most from electric vehicles when policies and technologies shift the new load from charging to off-peak times. Exploration of charging behavior, as outlined in the residential charging portion of the proposal, will support Duke Energy Ohio in ultimately implementing effective policies to shift electric vehicle charging load.

Light-duty vehicles make up the vast majority of EVs on the road today. Over the next several years, significant advances will be made in medium- and heavy-duty EVs. Duke Energy Ohio’s pilot will support these industry developments and further understanding of medium- and heavy-duty electric vehicle deployment through their support for electric school buses, electric transit buses, and chargers for fleets.

Duke Energy Ohio’s proposed pilot includes key differences with AEP Ohio’s approved electric vehicle pilot program. Clean Fuels Ohio supported AEP Ohio’s program and supports the differences in Duke Energy Ohio’s proposal, as it is valuable to test a variety of approaches to understanding and accelerating electric vehicle adoption.

The proposed ET pilot will help our organization accomplish our mission and ultimately transform the future of transportation and air quality in the Greater Cincinnati Area.

If you have any questions, feel free to contact me for more information. Thank you for your consideration.

Sincerely,

Brendan Kelley  
Drive Electric Ohio Program Director  
Clean Fuels Ohio

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

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

Summary: Public Comment electronically filed by Docketing Staff on behalf of Docketing