

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

---

**OBJECTIONS TO PUCO STAFF REPORT**  
**FILED BY EVGO SERVICES LLC**

---

**I. INTRODUCTION**

Pursuant to R.C. 4909.19(C) and Ohio Admin. Code 4901-1-28, EVgo Services LLC (“EVgo”) submits the following objections to the Staff Report filed on November 18, 2020, and modified on November 25, 2020, in Case Nos. 20-585-EL-AIR, 20-586-EL-ATA, and 20-587-ELAAM. These cases relate to Applications filed by the Ohio Power Company (“AEP Ohio”) for authority to increase and otherwise modify its rates and other customer programs.

EVgo’s objections identify elements of the Staff Report that are unjust or unreasonable. The substance of these objections will be supplemented and/or supported with the testimony of anticipated witnesses sponsored by EVgo. EVgo’s objections identify matters in the Staff Report where Staff has either made, or failed to make, recommendations, resulting in rates or service terms that contravene what is just, reasonable and lawful for customers in AEP Ohio territory. Where the Staff has indicated

that its position on a particular issue is not known at the date of the Staff Report, EVgo reserves the right to later supplement its objections once Staff's position is made known. EVgo also reserves the right to file additional expert testimony, produce fact witnesses and introduce additional evidence. Moreover, any witness called by EVgo reserves the right to amend and/or supplement testimony in the event that Staff reverses, modifies, or withdraws its position on any issue contained in the Staff Report.

## **II. OBJECTIONS**

### **A. Demand Side Management (DSM)**

1. EVgo objects that the Staff Report is unjust and unreasonable because it recommends rejecting the DSM Plan, including the Electric Transportation Programs, without providing reasonable cause. For example, Staff cites risks to ratepayers due to regulatory uncertainty surrounding the potential repeal of H.B. 6 without clearly detailing how this legislative uncertainty relates to electric vehicles (“EVs”) and electric vehicle charging.<sup>1</sup>

2. EVgo objects to the Staff Report in that it fails to give adequate consideration to the numerous benefits of the DSM program as identified in AEP Ohio testimony, including “supporting the growing electric vehicle charging sector,” supporting economic development and job growth in Ohio, and supporting customer interest in energy efficiency programs.<sup>2</sup>

3. EVgo objects to the Staff Report in that it fails to consider the significant ratepayer benefits of the proposed Electric Transportation Program, including by

---

<sup>1</sup> PUCO Staff Report, p. 21.

<sup>2</sup> *Direct Testimony of John Williams on behalf of Ohio Power Company*, pp. 14-19 (June 15, 2020).

providing downward electricity rate pressure, reducing transportation emissions, improving system information and program participation, and increasing access to public charging.<sup>3</sup>

4. EVgo objects to the Staff Report in that it fails to consider the appropriate timing of AEP Ohio's proposed implementation of the Electric Transportation Program, including that it would "build on the momentum of its pilot EV charging station rebate program."<sup>4</sup>

## **B. Rates and Tariffs**

1. EVgo objects that the Staff Report failed to consider how rate designs, including commercial EV rates, could also address EV adoption and create benefits to the electric grid.

2. EVgo objects that the Staff Report failed to consider how alternative rate designs, including commercial EV rates, could incentivize electric vehicle charging in AEP Ohio's territory and otherwise support the growing electric vehicle charging sector identified by AEP Ohio.



---

Jacob Schlesinger  
Keyes & Fox LLP  
1580 Lincoln St. Suite 880,  
Denver, CO 80203  
Phone: (970) 531-252  
Email: [jschlesinger@keyesfox.com](mailto:jschlesinger@keyesfox.com)

December 18, 2020

*Counsel to EVgo Services LLC*

---

<sup>3</sup>See *Direct Testimony of Jeffrey W. Lehman on behalf of Ohio Power Company*, pp. 4-6 (June 15, 2020); see also [https://www.synapse-energy.com/sites/default/files/EV\\_Impacts\\_June\\_2020\\_18-122.pdf](https://www.synapse-energy.com/sites/default/files/EV_Impacts_June_2020_18-122.pdf).

<sup>4</sup> *Direct Testimony of Jeffrey W. Lehman on behalf of Ohio Power Company*, pp. 7:13-14.

## **CERTIFICATE OF SERVICE**

I certify that this EVgo Services LLC's *Objections to PUCO Staff Report* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on December 18, 2020. The PUCO's e-filing system will electronically serve notice of the filing of this document on the parties subscribed to these proceedings. Additionally, notice was provided to the parties listed below.

/s/ Alicia Zaloga  
Alicia Zaloga  
KEYES & FOX LLP  
1155 Kildaire Farm Road, Ste. 202-203  
Cary, NC 27511  
Tele: (919) 825 – 1739  
Email: [azaloga@keyesfox.com](mailto:azaloga@keyesfox.com)

## **SERVICE LIST**

### **Ohio Power Company**

[stnourse@aep.com](mailto:stnourse@aep.com)  
[cblend@aep.com](mailto:cblend@aep.com)  
[egallon@porterwright.com](mailto:egallon@porterwright.com)  
[christopher.miller@icemiller.com](mailto:christopher.miller@icemiller.com)

### **ChargePoint, Inc.**

[dborchers@bricker.com](mailto:dborchers@bricker.com)  
[kherrnstein@bricker.com](mailto:kherrnstein@bricker.com)  
[jspottswood@bricker.com](mailto:jspottswood@bricker.com)

### **Clean Fuels Ohio**

[mfleisher@dickinsonwright.com](mailto:mfleisher@dickinsonwright.com)

### **Direct Energy Business, LLC and Direct Energy Services, LLC**

[whitt@whitt-sturtevant.com](mailto:whitt@whitt-sturtevant.com)  
[fykes@whitt-sturtevant.com](mailto:fykes@whitt-sturtevant.com)

### **Environmental Law & Policy Center**

[ccox@elpc.org](mailto:ccox@elpc.org)  
[rkelter@elpc.org](mailto:rkelter@elpc.org)

### **Industrial Energy Users-Ohio**

[rglover@mcneeslaw.com](mailto:rglover@mcneeslaw.com)  
[mpritchard@mcneeslaw.com](mailto:mpritchard@mcneeslaw.com)  
[bmckenney@mcneeslaw.com](mailto:bmckenney@mcneeslaw.com)

### **Interstate Gas Supply, Inc.**

[bethany.allen@igs.com](mailto:bethany.allen@igs.com)  
[joe.oliker@igs.com](mailto:joe.oliker@igs.com)

	<a href="mailto:michael.nugent@igs.com">michael.nugent@igs.com</a>
<b>ARMADA Power LLC</b>	<a href="mailto:mjsettineri@vorys.com">mjsettineri@vorys.com</a> <a href="mailto:glpetrucci@vorys.com">glpetrucci@vorys.com</a> <a href="mailto:dromig@armadapower.com">dromig@armadapower.com</a>
<b>Natural Resources Defense Council</b>	<a href="mailto:rdove@keglerbrown.com">rdove@keglerbrown.com</a>
<b>Ohio Consumers' Counsel</b>	<a href="mailto:angela.obrien@occ.ohio.gov">angela.obrien@occ.ohio.gov</a> <a href="mailto:christopher.healey@occ.ohio.gov">christopher.healey@occ.ohio.gov</a>
<b>Ohio Energy Group</b>	<a href="mailto:mkurtz@BKLawfirm.com">mkurtz@BKLawfirm.com</a> <a href="mailto:kboehm@BKLawfirm.com">kboehm@BKLawfirm.com</a> <a href="mailto:jkylercohn@BKLawfirm.com">jkylercohn@BKLawfirm.com</a>
<b>Ohio Environmental Counsel</b>	<a href="mailto:mleppla@theOEC.org">mleppla@theOEC.org</a> <a href="mailto:tdougherty@theOEC.org">tdougherty@theOEC.org</a> <a href="mailto:ctavenor@theOEC.org">ctavenor@theOEC.org</a>
<b>Ohio Hospital Association</b>	<a href="mailto:dparram@bricker.com">dparram@bricker.com</a> <a href="mailto:rmains@bricker.com">rmains@bricker.com</a>
<b>Ohio Manufacturers' Association Energy Group</b>	<a href="mailto:Bojko@carpenterlipps.com">Bojko@carpenterlipps.com</a>
<b>The Kroger Company</b>	<a href="mailto:paul@carpenterlipps.com">paul@carpenterlipps.com</a>
<b>Walmart, Inc.</b>	<a href="mailto:cgrundmann@spilmanlaw.com">cgrundmann@spilmanlaw.com</a> <a href="mailto:dwilliamson@spilmanlaw.com">dwilliamson@spilmanlaw.com</a> <a href="mailto:Stephen.Chriss@walmart.com">Stephen.Chriss@walmart.com</a>
<b>Ohio Partners for Affordable Energy</b>	<a href="mailto:rdove@keglerbrown.com">rdove@keglerbrown.com</a>
<b>One Energy Enterprises LLC</b>	<a href="mailto:ktreadway@oneenergyllc.com">ktreadway@oneenergyllc.com</a> <a href="mailto:dstinson@bricker.com">dstinson@bricker.com</a> <a href="mailto:mwarnock@bricker.com">mwarnock@bricker.com</a> <a href="mailto:hogan@lithio.com">hogan@lithio.com</a> <a href="mailto:little@lithio.com">little@lithio.com</a>
<b>Staff of the Public Utilities Commission of Ohio</b>	<a href="mailto:Werner.margard@ohioattorneygeneral.gov">Werner.margard@ohioattorneygeneral.gov</a>

[Kyle.kern@ohioattorneygeneral.gov](mailto:Kyle.kern@ohioattorneygeneral.gov)  
[John.jones@ohioattorneygeneral.gov](mailto:John.jones@ohioattorneygeneral.gov)  
[Steven.Beeler@ohioattorneygeneral.gov](mailto:Steven.Beeler@ohioattorneygeneral.gov)

**Attorney Examiners**

[Sarah.Parrot@puco.ohio.gov](mailto:Sarah.Parrot@puco.ohio.gov)  
[Greta.See@puco.ohio.gov](mailto:Greta.See@puco.ohio.gov)

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

**Commission of Ohio Docketing Information System on**

**12/18/2020 5:28:36 PM**

**in**

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

Summary: Objection to PUCO Staff Report electronically filed by Ms. Alicia A Zaloga on behalf of EVgo Services LLC