

May 7, 2021

The Honorable Greta See
The Honorable Sarah Parrot
Attorney Examiners
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, Ohio 43215

**RE: In the Matter of the Application of Ohio Power Company for an
Increase in Electric Distribution Rates and Related Matters, Case Nos. 20-
585-EL-AIR, *et al.***

Dear Examiners:

On April 9 2021, EVgo Services, LLC (EVgo) timely filed the Testimony in Support of the March 12, 2021 Joint Stipulation and Recommendation of Sara Rafalson in the above-referenced proceedings. Because Ms. Rafalson is not an expert on the Public Utilities Commission of Ohio's standards for the admission of stipulations, EVgo is withdrawing portions of her testimony that previously provided an opinion on such matters. As such, Ms. Rafalson's previously filed testimony regarding whether the Commission should adopt the Stipulation (P. 6, LN. 4-8) based on Ohio's three-part test has been deleted and EVgo is refileing the attached revised testimony to reflect this deletion.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Jacob Schlesinger
Jacob Schlesinger
Keyes & Fox LLP
1580 Lincoln St., Suite 880
Denver, CO 80203
Phone (970) 531-2525
Email: jsclesinger@keyesfox.com

Counsel to EVgo Services LLC

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

REVISED

TESTIMONY IN SUPPORT OF THE
MARCH 12, 2021 JOINT STIPULATION AND RECOMMENDATION

OF

SARA RAFALSON
ON BEHALF OF
EVGO SERVICES LLC

April 9, 2021

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REVISED
TESTIMONY IN SUPPORT OF THE
MARCH 12, 2021 JOINT STIPULATION AND RECOMMENDATION
OF
SARA RAFALSON

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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO
REVISED TESTIMONY IN SUPPORT OF THE
MARCH 12, 2021 JOINT STIPULATION AND RECOMMENDATION
OF
SARA RAFALSON
ON BEHALF OF
EVGO SERVICES LLC

1 I. **INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Sara Rafalson. My business address is 11835 W. Olympic Boulevard,
4 Suite 900E, Los Angeles, California 90064.

5 **Q. By whom and in what capacity are you employed?**

6 A. I am employed by EVgo Services LLC (“EVgo”). I am testifying on behalf of
7 EVgo as its Vice President of Market Development and Public Policy.

8 **Q. Please briefly describe EVgo.**

9 A. EVgo is an electric vehicle (“EV”) service provider that owns and operates the
10 United States’ largest public EV fast charging network. EVgo has more than 800
11 publicly accessible direct current fast charging (“DCFC”) locations installed in 34
12 states and 67 metropolitan markets, including in Ohio. Founded in 2010, EVgo is
13 a leader in transportation electrification, partnering with automakers; fleet and
14 rideshare operators; retail hosts such as hotels, shopping centers, gas stations, and
15 parking lot operators; and other stakeholders to deploy advanced charging
16 technology to expand network availability to make it easier for all Americans to
17 enjoy the benefits of driving an EV. EVgo works closely with business and
18 government leaders to accelerate adoption of EVs by providing a reliable and

1 convenient charging experience close to where drivers live, work and play, whether
2 for a daily commute or a commercial fleet.

3 **Q. Is EVgo active in Ohio?**

4 A. Yes. EVgo currently owns and operates 23 DCFC locations in Ohio, including 7
5 within the Ohio Power Company (“AEP Ohio”) service territory, with plans for
6 expansion. Notably, EVgo entered into a partnership with General Motors in 2020
7 whereby EVgo will triple its DCFC network across 40 metropolitan areas over the
8 coming years by building more than 2,700 fast chargers across the country.¹

9 **Q. What is EVgo’s interest in this proceeding?**

10 A. As indicated above and in EVgo’s intervention in this proceeding,² EVgo is a
11 commercial customer in AEP Ohio’s service territory and is actively planning to
12 increase its presence within the State. Accordingly, EVgo has a direct and
13 substantial interest in the outcome of this Application, including any proposed
14 changes to AEP Ohio’s rates. EVgo also works with other automakers, such as
15 Nissan, to expand charging infrastructure in important EV markets.³ As EVgo
16 considers where to prioritize its investments, rate design is a critical determinant.

17 **Q. Have you previously provided testimony before the Public Utilities
18 Commission of Ohio (“PUCO” or the “Commission”)?**

19 A. No.

¹ July 31, 2020 GM Press Release, General Motors and EVgo aim to accelerate widespread EV adoption by adding fast chargers nationwide, *available at*: <https://media.gm.com/media/us/en/gm/news.detail.html/content/Pages/news/us/en/2020/jul/0731-evgo.html> fast-chargers-nationwide/.

² Motion for Leave to Intervene (Dec. 18, 2020) and Order Granting Motion on Jan. 21, 2021.

³ See *Nissan and EVgo expand charging network with 200 new EV fast chargers* (Aug. 6, 2019) *available at*: <https://www.evgo.com/about/news/nissan-and-evgo-expand-charging-network-with-200-new-ev-fast-chargers/>.

1 **Q. Have you previously provided testimony before any other state utilities**
2 **commissions?**

3 A. Yes. I have testified before several state commissions. For example, I recently
4 submitted testimony before the Arizona Corporation Commission in *In the Matter*
5 *of the Application of Arizona Public Service Company for a Hearing to Determine*
6 *the Fair Value of the Utility Property of the Company for Ratemaking Purposes,*
7 *To Fix a Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules*
8 *Designed to Develop Such Return* (Docket No. E-01345A-19-0236), before the
9 Public Utilities Commission of the State of Colorado in *In the Matter of the*
10 *Application of Public Service Company of Colorado for Approval of Its 2021-2023*
11 *Transportation Electrification Plan* (Proceeding No. 20A-0204E), and have
12 testified before the Illinois Commerce Commission in *Ameren Illinois Company*
13 *d/b/a Ameren Illinois Proposed Creation of Rider Optional Electric Vehicle*
14 *Charing Program* (Case No. 20-0710).

15 **II. PURPOSE OF TESTIMONY**

16 **Q. What is the purpose of this testimony?**

17 A. The purpose of my testimony is to support the Joint Stipulation and
18 Recommendation (“Stipulation”) filed by the Ohio Power Company (“AEP Ohio”
19 or the “Company”) on March 12, 2021 and joined by several intervening parties,
20 including EVgo. Specifically, this testimony will focus on Section III.E.16.b of the
21 Stipulation, which provides for the proposed adoption of a pilot electric vehicle
22 (“PEV”) tariff that will allow new separately metered Level 2 or DCFC EV
23 charging stations to be billed on non-demand metered rates, as further detailed in

1 Attachment C of the Stipulation.

2 **Q. Why does EVgo support the stipulation?**

3 A. As stated previously, rate design is a critical consideration for EVgo. Traditional
4 commercial tariff structures, which often have components that are calculated based
5 on the customer's maximum demand for electricity during a short timeframe, are
6 incompatible with public charging growth because of the unique load profile of
7 DCFC. The PEV tariff will allow commercial customers such as EVgo to be billed
8 on non-demand metered rates.

9 **Q. Please explain why demand charges are problematic for EV infrastructure.**

10 A. Generally, the timeframe for a demand charge is the highest 15-minute interval of
11 demand during the billing cycle. This timeframe is a problem for DCFC stations
12 because the station is only used for a short time—typically less than an hour—while
13 users recharge their EV at intermittent periods throughout the day. During this
14 short time period, charging stations must disburse a significant amount of electricity
15 to fully recharge the driver's vehicle, and for the utility's billing purposes, that
16 disbursement represents a demand increase that would be captured by a demand
17 charge. As a result, the station operator will be subject to the demand charge even
18 if the station itself is used infrequently. This will result in unnecessarily high
19 energy bills for EV infrastructure providers such as EVgo and impede private
20 investment in DCFC infrastructure.

21 **Q. Please explain how the PEV tariff proposed in the Stipulation resolves these**
22 **rate design issues.**

23 A. By offering non-demand metered rates for qualifying commercial customers (*i.e.*,

1 those who present new load), the PEV public charging tariff offers the appropriate
2 rate design incentives and certainty to facilitate increased private sector
3 development of charging infrastructure throughout the Company’s service territory.

4 **Q. Does the PEV tariff offer any other benefits to customers or the public?**

5 A. Yes. EV charging, particularly when guided by proper rate design such as the Time
6 of Use (“TOU”) rates included in the proposed PEV tariff, can increase the
7 efficiency of the grid, reduce peak load and take advantage of times with low
8 electricity prices. As a result, EVs improve grid utilization, which drives down
9 costs for *all* customers.⁴ Additionally, adoption of rate design structures that will
10 facilitate the development of EV charging infrastructure will bring the obvious
11 benefits of encouraging more widespread adoption of EVs, resulting in reduced
12 emissions, a cleaner environment, and lower healthcare costs.⁵

13 **Q. Are you aware of any other public utility commissions across the country that
14 have approved EV rates similar to that proposed in the Stipulation?**

15 A. Yes. If the PUCO were to approve the Stipulation and the proposed PEV tariff
16 therein, it would join more than 20 states across the country that have approved EV

⁴ See, e.g., Jason Frost, Melissa Whited and Avi Allison, “Electric Vehicles are Driving Electric Rates Down,” Synapse Energy, June 2020 (explaining how EV charging can benefit all ratepayers, including by lower rates) *available at*: https://www.synapse-energy.com/sites/default/files/EV_Impacts_June_2020_18-122.pdf.

⁵ See, e.g., Illinois Commerce Commission Notice of Inquiry (20-NOI-03), *Electric Rate Design Issues for Transportation Electrification and Other Beneficial Electrification*, Report to the Commission, Mar. 3, 2021, (summarizing broad spectrum of benefits of rate design mechanisms that encourage EV adoption) *available at*: <https://www.icc.illinois.gov/notice-of-inquiry/20-noi-03>.

1 rates, including utilities in nearby states such as Wisconsin,⁶ Pennsylvania,⁷ and
2 Michigan.⁸

3 **III. CONCLUSION**

4 **Q. Does this conclude your testimony?**

5 A. Yes.

⁶ See Madison Gas and Electric, Low Load Factor Provision, *available at* <https://www.mge.com/customer-service/for-businesses/electric-rates/low-load-factor-provision>.

⁷ See PECO Energy Company, Electric Service Tariff, *available at* <https://www.peco.com/SiteCollectionDocuments/CurrentTariffElec.pdf>.

⁸ See DTE Electric Company, Rate Book for Electric Service, *available at* https://www.michigan.gov/documents/mpsc/dtee1cur_579203_7.pdf.

CERTIFICATE OF SERVICE

I certify that this Revised Testimony in Support of the March 12, 2021 Joint Stipulation And Recommendation of Sara Rafalson on behalf of EVgo Services, LLC was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on May 7, 2021. 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

SERVICE LIST

Ohio Power Company

stnourse@aep.com
cblend@aep.com
egallon@porterwright.com
christopher.miller@icemiller.com

ChargePoint, Inc.

dborchers@bricker.com
kernstein@bricket.com

Clean Fuels Ohio

mfleisher@dickinsonwright.com

Citizens' Utility Board of Ohio

cpirik@dickinsonwright.com
wvorys@dickinsonwright.com

Greenlots (Zeco Systems, Inc.)

todonnell@dickinsonwright.com
tom@greenlots.com
jcohen@greenlots.com

Direct Energy Business, LLC and Direct Energy Services, LLC

whitt@whitt-sturtevant.com
fykes@whitt-sturtevant.com

Environmental Law & Policy Center

ccox@elpc.org
rkelter@elpc.org

Industrial Energy Users-Ohio

rglover@mcneeslaw.com
mpritchard@mcneeslaw.com
bmckenney@mcneeslaw.com

Interstate Gas Supply, Inc.

bethany.allen@igs.com
joe.oliker@igs.com
michael.nugent@igs.com
fdarr2019@gmail.com
evan.betterton@igs.com

ARMADA Power LLC

mjsettineri@vorys.com
glpetrucci@vorys.com
dromig@armadapower.com

Natural Resources Defense Council

rdove@keglerbrown.com

Ohio Consumers' Counsel

angela.obrien@occ.ohio.gov
christopher.healey@occ.ohio.gov
john.finnigan@occ.ohio.gov

Ohio Energy Group

mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

Ohio Environmental Counsel

mleppla@theOEC.org
tdougherty@theOEC.org
ctavenor@theOEC.org

Ohio Hospital Association

dparram@bricker.com
rmains@bricker.com

**Ohio Manufacturers' Association
Energy Group**

Bojko@carpenterlipps.com
donadio@carpenterlipps.com

The Kroger Company

paul@carpenterlipps.com

Walmart, Inc.

cgrundmann@spilmanlaw.com
dwilliamson@spilmanlaw.com

Stephen.Chriss@walmart.com

Ohio Partners for Affordable Energy

rdove@keglerbrown.com

One Energy Enterprises LLC

ktreadway@oneenergyllc.com

dstinson@bricker.com

mwarnock@bricker.com

hogan@litohio.com

little@litohio.com

**Staff of the Public Utilities
Commission of Ohio**

werner.margard@ohioattorneygeneral.gov

kyle.kern@ohioattorneygeneral.gov

Thomas.shepherd@ohioattorneygeneral.gov

Attorney Examiners

Sarah.Parrot@puco.ohio.gov

Greta.See@puco.ohio.gov

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Summary: Testimony Revised Testimony in Support of the March 12, 2021 Joint Stipulation and Recommendation of Sara Rafalson and Cover Letter electronically filed by Ms. Alicia A Zaloga on behalf of EVgo Services LLC