

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of The Commission's)
Investigation Into The Implementation of The)
Federal Infrastructure Investment and Jobs)
Act's Electric Vehicle Charging PURPA)
Standard.)

Case No. 22-1025-AU-COI

REPLY COMMENTS OF CHARGEPOINT, INC.

I. INTRODUCTION

ChargePoint, Inc. ("ChargePoint") respectfully submits these reply comments to the Public Utilities Commission of Ohio ("Commission") regarding the investigation into the implementation of the Infrastructure Investment and Jobs Act's, H.R. 3684 ("IIJA") electric vehicle ("EV") charging Public Utility Regulatory Policy Act ("PURPA") standard in the above captioned proceeding.

II. COMMENTS

As clearly demonstrated in DriveOhio's Alternative Fuel Vehicle ("AFV") Registration Dashboard, new AFV registrations have been steadily increasing in the last few years, with registrations primarily for battery electric vehicles rather than plug-in hybrid electric vehicles.¹ In its initial comments, Interstate Gas Supply, LLC points out that the statute does not require the Commission to adopt the PURPA standards.² However, given the increase in EV adoption that

¹ AFV Registration Dashboard, available at: <https://app.powerbi.com/view?r=eyJrIjoiMDdkNzE5YmQtMTdkMi00MjNiLWFINWYtMTBiZDU1ODZIYTQ4IiwidCI6IjZhYmJINDIiLTkzYjYtNDUxMi04MzQ5LWI1MmE1MWYzMzUyMSJ9&pageName=ReportSection0d6b2f5e11e2ae090000>.

² Interstate Gas Supply, LLC Initial Comments, pp. 1-2.

will certainly continue, the state will benefit from implementing the PURPA standards across all utilities regulated by the Commission. Doing so will ensure the state will maximize the benefits that EV adoption can bring and will create a unified and formalized approach to transportation electrification (“TE”). The benefits of EV adoption include downward pressure on rates, opportunities for load-management, and reduced emissions. For these reasons, ChargePoint strongly recommends the Commission establish new measures that promote greater electrification of the transportation sector through third party investments, such as those described in these reply comments and our initial comments.

A. Demand Charge Alternative Rates

One key barrier for public EV charging sites recognized by utilities across the nation is traditional demand-based rates. As discussed in our opening comments, traditional demand-based rates impact both site hosts and EV drivers. An EV charging site host taking service under traditional demand-charged rates can face significant demand charges as a result of the sporadic, power-intensive charging sessions that occurs due to drivers’ need to quickly charge at public stations. This includes public and private fleets that must charge multiple vehicles at high powers simultaneously. Unlike traditional commercial customers on demand-based rates, public EV charging station site hosts are limited from managing or mitigating the impact of demand charges without negatively impacting the driver. Limiting the number of ports in use simultaneously or restricting the amount of power to ports would disregard drivers’ charging needs. These high demand charges coupled with the current, relative low, or seasonal utilization significantly threatens the economic viability of charging stations and subsequently disincentivizes the deployment of stations and third-party investment, which would increase range anxiety for drivers who require public charging and for those who primarily rely on public charging. Further,

the inconsistency of rate offerings applicable to charging stations throughout the state may lead to long-term geographic disparities in EV charger deployment and access.

Similarly, several parties discuss the importance of developing rates that reduce the barrier of demand charges on the EV charging market.³ For instance, EVgo discusses the benefit of a rate that accounts for the unique loads of fast charging stations and recommends the Commission open a statewide proceeding to encourage Ohio utilities to introduce specific commercial EV rates.⁴ ChargePoint supports this recommendation but points out that there are best practice rates available that are “technology neutral” enabling any commercial and industrial customer to take service on the applicable rate structure whether the customer operates an EV charging station or not. Thus, ChargePoint recommends the Commission direct utilities by November 2023 to implement a long-term sustainable rate design alternative to traditional demand-based rate structures while appropriately recovering the costs to serve the new load, taking into account best practice principles available.⁵

B. Make-Ready Programs

A common and effective model of utility investment in transportation electrification is for the utility to provide make-ready infrastructure for non-utility site hosts. Make-ready incentive programs are very common around the country and have proven effective at encouraging deployment of public EV charging, as well as Level 2 chargers and DCFCs designed for other

³ EVgo Initial Comments pp. 3-4, Electrify America Initial Comments p. 2, Sheetz Initial Comments pp. 2-3, Charge Ahead Partnership Initial Comments pp. 3-4.

⁴ EVgo Initial Comments pp. 3-4.

⁵ See “Best Practices for Sustainable Commercial EV Rates and PURPA 111(d) Implementation,” December 2022, available at <https://pubs.naruc.org/pub/55C47758-1866-DAAC-99FB-FFA9E6574C2B>; See “Electric Transportation Rate Design Principles for Regulated Utilities,” July 2021, available at <https://evtransportationalliance.org/wp-content/uploads/2022/02/ATE-Rate-Design-Principles-Final-July-202194.pdf>; See “Rate Design for EV Fast Charging: Demand Charges,” May 2022, available at https://evtransportationalliance.org/wp-content/uploads/2022/06/Rate.Design.TF_.Demand-Charge-Paper-Final-5.25.22.pdf

use cases such as fleets, workplaces, and multi-family housing, with examples including AEP Ohio's make ready/rebate program.⁶ Make-ready programs also provide an alternative to utility-ownership programs, avoiding the market distortions that arise from a utility offering a competitive service while recovering revenue shortfalls from ratepayers. Similarly, Sheetz and the Charge Ahead Partnership voice concerns over utilities participating in the market without market or competitive forces at play due to the limited risk with the ability to utilize ratepayer funding.⁷ This emphasizes the preference for make ready programs over utility ownership as it allows utilities to support the EV charging market rather than competing in it. Therefore, ChargePoint reiterates its recommendation that the Commission direct the State's utilities to develop and implement make ready programs.

C. Line Extension Policies

In initial comments, ChargePoint recommended the Commission create a permanent line extension rule that would provide long-term, efficient support for EV infrastructure comparable to other utility distribution investments. In Ohio, this can be accomplished by adjusting customer contributions under existing Contributions in Aid of Construction policies in the state. These policies help defer large upfront costs for new electric service, supporting new EV charging customers and incentivizing investment. In fact, AEP Ohio recommends modernizing contribution in aid of construction charges to accelerate third-party investment in EV charging.⁸

AES Ohio discusses its current contribution in aid of construction guidelines, stating “[f]or new service to an AES Ohio customer, AES Ohio is responsible for 60% of all standard

⁶ I/M/O the Application of Ohio Power Company for Authority to Establish A Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan, PUCO Docket 16-1852-EL-SSO (April 25, 2018)

⁷ Sheetz Initial Comments, p. 3; Charge Ahead Partnership Initial Comments, pp. 4-5.

⁸ Ohio Power Company (“AEP Ohio”) Initial Comments, p. 5.

construction costs and the customer is responsible for 40% of the construction costs plus the tax liability of 27.5%.”⁹ However, a reduced or eliminated customer contribution may be warranted. It is important to ensure the customer’s contribution reflects the marginal costs of delivering electricity to EVs and EV charging infrastructure while balancing the need to increase EV adoption, which can ultimately reduce rates for all ratepayers. Duke Energy recommends the Commission continually update its line extension policies.¹⁰ ChargePoint supports this as a minimized customer contribution may not only increase EV charging infrastructure in the state but also bring about widespread benefits for ratepayers.

D. Hosting Capacity Maps

The Ohio Manufacturers’ Association Energy Group (“OMAEG”) recommends that the Commission require utilities to publish hosting capacity maps.¹¹ ChargePoint agrees that this can provide valuable information to inform siting of potential EVSE that can utilize existing distribution infrastructure and minimize costs. However, these maps should be informative and not proscriptive. Site hosts and EVSE companies should not be limited from submitting sites for participation in programs whether or not the site has been identified via the EDCs’ Hosting Capacity Maps. Additionally, a site not otherwise identified during the mapping process should not impede the work necessary to make the location operational.

At a minimum, the capacity maps should include available load serving capacity at the substation and circuit level (accounting for queued capacity), feeder identification and characteristics, substation source, and voltage information. Information about transformer locations and load and other “last mile” grid information, presented in a user-friendly fashion for

⁹ Dayton Power and Light Company d/b/a AES Ohio (“AES Ohio”) Initial Comments, p. 5.

¹⁰ Duke Energy Ohio Initial Comments, p. 6.

¹¹ OMAEG Initial Comments, pp. 6-7.

the electric vehicle service provider (“EVSP”) market, would be valuable in streamlining deployments for third parties. Not only would these capacity map improvements enable more efficient EVSE site selection, but it would also enhance EVSE energization timelines overall by ensuring that prospective site hosts are utilizing existing utility equipment, where feasible, that would otherwise have had to be installed to enable the EVSE to energize.

Further, ChargePoint suggests that the utilities and the Commission look at the New York utilities’ maps, which provide distribution feeder and substation information, including feeder ID and characteristics, such as geographic locations; substation source; planning area; voltage information; and loading and available hosting capacity.¹² Additionally, New Jersey utilities Atlantic City Electric and Public Service Electric & Gas are required to “post on the Company’s website public maps that detail areas which are best suited for EV infrastructure build-out [...] prepared and updated by the Company on a regular basis [...]”¹³

III. CONCLUSION

ChargePoint appreciates the opportunity to submit these reply comments in response to the other stakeholders engaged in this investigation. We look forward to continuing to work with the Commission and other stakeholders to help achieve Ohio’s energy, environmental, transportation, and economic development goals by reducing barriers to sustainable and scalable growth in the competitive EV charging market.

¹² Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs, NYPSC Case 18-E-0138 (July 16, 2020).

¹³ See, e.g., I/M/O the Petition of Atlantic City Electric Company for Approval of a Voluntary Program for Plug-In Electric Vehicle Charging, BPU Docket No. EO18020190 (Feb. 17, 2021); I/M/O the Petition of Public Service Electric and Gas Company for Approval of its Clean Energy Future – Electric Vehicle and Energy Storage Program on a Regulated Basis, BPU Docket No. EO18101111 (Feb. 3, 2021).

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CERTIFICATE OF SERVICE

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