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-VIA ELECTRONIC FILING-

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket No. 20200000-OT Florida Power & Light Company's and Gulf Power Company's Post-Workshop/SB 7018 Comment

Dear Mr. Teitzman:

Please find attached Florida Power & Light Company's and Gulf Power Company's Post-Workshop/SB 7018 Comment.

If there are any questions regarding this filing, please contact me at (561) 304-5662.

Sincerely,

/s/ William P. Cox
William P. Cox
Fla. Bar No. 0093531

cc: Ben Crawford, PSC
Adria Harper, Senior Attorney, Office of General Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Electric Vehicle (EV) Master Plan for
EV Charging Station Infrastructure for State
Highway System

Docket No. 20200000

Filed: November 20, 2020

**FLORIDA POWER & LIGHT COMPANY AND GULF POWER COMPANY’S POST-
WORKSHOP COMMENTS**

Florida Power & Light Company (“FPL”) and Gulf Power Company (“Gulf”) appreciate the opportunity to participate in the Florida Public Service Commission (“Commission”) Staff Workshop (“Workshop”) regarding the Electric Vehicle (“EV”) Master Plan on October 21, 2020. FPL and Gulf are committed to supporting the growth and adoption of EVs in the state by removing the barriers to EV adoption and expanding access to EV charging. Despite some varying opinion about how to accomplish this, it was clear all Workshop participants are invested and committed to the expansion of EV use in this state. Based on the Workshop discussion, FPL and Gulf submit the below comments for consideration.

Legislative & Regulatory Recommendations

FPL and Gulf commend the Florida Legislature for acknowledging the role EVs can play in mitigating the impacts of climate change on the state and requiring the creation of a plan (“Master Plan”) for EV supply equipment (“EVSE”). The Master Plan is a great first step; FPL and Gulf believe the real work is just beginning. Real accomplishments will only occur with the Commission’s continued support.

Based on the SB 7018 requirement that the Master Plan include legislative recommendations, FPL and Gulf submit the following legislative recommendations for Commission and Florida Department of Transportation (FDOT) consideration:

- i. Implement statewide EV and EVSE deployment goals or adopt a Zero Emission Vehicle (“ZEV”) standard. The majority of approved utility EV programs in other states are the result of state legislative action or goals.
- ii. Build on the concept of utility ownership of EVSE contemplated by SB 7018 by addressing the Commission’s authority to approve innovative rate structures that evolve with the growth of the EV industry. SB 7018 calls for inclusion of utilities in the marketplace for the delivery of electricity to EVs and charging station infrastructure; further codifying the utility role will help to spur investment.

Make-Ready

At the October workshop, the Commission Staff suggested that all respondents agreed on the benefits of Make-Ready (*i.e.*, the electrical infrastructure needed up to but not including the charger to support EV charging) to the market. While FPL and Gulf acknowledge the role Make-Ready has played in other markets in the country, we believe it is too soon to dictate any one solution in Florida. In addition, Make-Ready limits the role of the utility, which many workshop participants recommended against. Given the nascence of the market, we do not believe the role of the utility should be narrowly defined or limited. Instead, any recommendations should allow the market to develop, embrace different business models and maintain flexibility.

Make-Ready investments in EV-related infrastructure are ratepayer funded, and regulated utilities should retain the ability to be involved with how funds are invested to ensure that they are used in a way that protect customers and make good use of the investment. When evaluating Make-Ready, the Commission should keep in mind the following implications:

- i. Make-Ready fails to fully take advantage of utility capital and installation expertise. Utility ownership allows for streamlined investment, reduces installation costs through scale, and provides access to low-cost capital.
- ii. Make-Ready does not ensure chargers are sited appropriately to address gaps in EVSE access.
 - a. Utility ownership is critical to ensure EVSE is deployed in a way that ensures equitable access in underserved and low-income areas.
 - b. Utility ownership is also critical to ensure evacuation routes, including primary and secondary highway corridors, are adequately served and resilient to ensure storm support.
- iii. Make-Ready carries a high risk of stranded assets and fails to take advantage of utility maintenance expertise. Once the chargers are installed by a non-utility, there is very little recourse on the part of the utility to ensure the chargers operate reliably. Utility owned and operated charging stations ensure the assets funded under the utility’s EV charging station program are operated for the full useful life of the assets.

Utility Rate Base of EVSE

FPL and Gulf believe regulated utilities have a critical role to play in advancing EVs and EVSE in the state in support of the Master Plan objectives, and utilities should be able to use all tools at their disposal to accomplish these objectives, including utility-ownership of charging stations, consistent with the public interest. The Legislature through SB 7018 has clearly and specifically called for “the participation of public utilities in the marketplace” for electricity delivery to EVs and charging stations. FPL and Gulf have detailed the benefits of utility ownership in our pre-workshop comments. FPL and Gulf also would note the pre-workshop comments and

workshop comments of Greenlots, Southern Alliance for Clean Energy, the Alliance for Transportation Electrification, and Advanced Energy Economy that all call for a strong role for utilities in EVSE ownership. Each robustly affirmed the role and value of utility involvement and ownership in the EVSE market.

FPL and Gulf would like to again thank the Commission Staff for their efforts in organizing the Workshop and would appreciate the opportunity to comment on the draft report that will be submitted to FDOT. We are happy to discuss any of the above comments, our pre-workshop comments, or our comments made at the Workshop further should Commission Staff have any questions.

Respectfully submitted this 20th day of November 2020.

By: /s/ William P. Cox

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