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November 20, 2020

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

*RE: 2020 Undocked File, Docket No. 20200000-OT, Request for Comment for EV
Workshop / SB 7018*

Dear Mr. Teitzman:

Please find attached, for electronic filing, comments of ChargePoint, Inc in response to Commission's staff request of post-workshop comments in the above referenced docket.

If you have any questions or require additional information about this filing, I can be reached at Justin.Wilson@ChargePoint.com.

Sincerely,

A handwritten signature in black ink, appearing to read "J Wilson", is written over the typed name.

Justin Wilson
Director, Public Policy
ChargePoint, Inc.

Introduction

ChargePoint thanks the Commission and Staff for this opportunity to submit post-workshop comments on this matter. The comments below are intended to reiterate key principles identified in ChargePoint's initial comments and included in the workshop transcript and to provide additional context and thoughts for the Commission's consideration on topics covered at the workshop, in particular competitively neutral policies.

Competitively Neutral Policies

Senate Bill 7018 tasked the Public Service Commission, in consultation with other state agencies, to "[i]dentify the types of regulatory structures necessary for the delivery of electricity to electric vehicles and charging station infrastructure, including competitive neutral policies and the participation of public utilities in the marketplace." In reviewing the comments of other stakeholders and the workshop transcript, ChargePoint believes that while there is much consensus that the current regulatory structure for the delivery of electricity to electric vehicles and charging station infrastructure is adequate, there is less consensus related to if there are sufficient competitively neutral policies in place at the Commission and how public utilities should participate in the marketplace.

At the outset, it is important to define the marketplace and understand how that marketplace is currently operating. In this instance we are discussing the marketplace for EV charging services. While there are some important differences such as the ability to charge (fuel) at larger variety of locations (homes, workplaces, and retail establishments) and a variety of charging levels (fueling speeds), the marketplace for public EV charging services is most akin to the marketplace for traditional liquid fuels such as convenience stores, gas stations, and truck stops. Recognition of this definition of the marketplace is one of the reasons why, in 2012, the legislature specified in section 366.94 (1) that "[t]he provision of electric vehicle charging to the public by a nonutility is not the retail sale of electricity" and that "the rates, terms, and conditions of electric vehicle charging services by a nonutility are not subject to regulation (*by the Public Service Commission*)." This language clarifies that the provision of electric vehicle charging is a competitive service in Florida. In this competitive marketplace there are two primary points of competition, for the EV driver in need of charging services and for the provision of the equipment and services to charge the EVs at the point of sale.

Currently, in the competitive marketplace for EV charging services, site hosts (those who control the point of sale) select the technologies they prefer in an open market, invest their own capital, seek any incentives available through public agencies or utilities, and, in the case of commercial stations, offer competitive charging services

to attract drivers. For their part, charging hardware, software, and service providers innovate new hardware, software, and service offerings to enable site hosts to choose the products and services that will best meet their needs. These providers compete to offer site hosts the best products to meet their unique needs at reasonable cost.

Ensuring that there are policies in place to enable these two primary points of competition in the marketplace is essential at this early stage of market development. In its initial comments in this docket, ChargePoint offered two principles that can be incorporated into the Commission's competitively neutral policies. Collectively these two principles, site host choice in products & services and site host choice in pricing will allow for the robust development of the EV charging marketplace.

Importantly, with site host choice in products & services and pricing established, utilities can support site hosts and charging hardware, software, and service providers by developing programs that make it cheaper and easier for site hosts to install charging equipment and provide charging services. With these competitively neutral policies in place the Commission and utilities are encouraging competition in the market and charging providers will develop innovative hardware, software, and services solutions to provide to site hosts. ChargePoint also suggest that moving forward, public utilities seek Commission approval for EV programs prior to implementation to allow market participants the ability to review plans and ensure the competitively neutral policies are in place.

In its initial comments ChargePoint encouraged the development of programs and policies in three primary areas that support the competitive marketplace for EV charging:

- Make-Ready Infrastructure: Make-ready infrastructure includes all the electrical and construction work necessary on both the utility's side of the electric meter and the customer's side of the electric meter to make a site ready to connect EV charging equipment. The cost of the make-ready infrastructure can be a significant amount of the total cost of installing EV charging equipment. Utilities can help the make-ready costs to site host either through providing rebates to cover all or a portion of the cost of make ready infrastructure or could directly install, own and operative the make-ready infrastructure on behalf of the site host.
- Smart Charger Incentives: Smart or networked charging equipment has the ability to connect to the internet and an EV network that enables the management of the EV charging station. As electric vehicle adoption increases, utilities may seek to offer additional programs or incentives for EV drivers and charging station site hosts that leverage the capability of smart chargers.

Encouraging the installation of smart chargers is a way to ensure site hosts will be able to participate in such programs in the future. Additionally, the data that smart chargers can capture greatly exceeds non-networked charging stations. Incentivizing smart charger deployment in Florida will ensure that EV can be used in programs that provide demand response, load shifting, and other services that will benefit the grid and all utility customers.

- Rates: Utilities should develop rate structures that take into consideration some of the unique operational characteristics of electric vehicle charging equipment. Rates should be developed that: 1) address low load factors associated with many electric vehicle charging use cases including public DC fast charging and fleets; 2) encourage charging, when possible, during off-peak times; and 3) utilize smart charging capabilities to shift load or provide demand response services.
- Utility Ownership of Charging Stations: Utility ownership of charging stations may be appropriate in certain instances. In these instances, the Commission should ensure that charging stations deployed by utilities provide site hosts with choices in products and the ability to set pricing to users to ensure stations are deployed in a competitively neutral manner.