KEYES&FOX LLP

June 9, 2025

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

RE: Docket No. 20250011-EI – In re: Petition by Florida Power & Light Company for Base Rate Increase

Dear Mr. Teitzman,

Please find attached for filing the Direct Testimony of R. Thomas Beach on behalf of EVgo Services, LLC and Exhibits RTB-1 and RTB-2. Thank you for your assistance with this matter. Please feel free to contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Yonatan Moskowitz

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Attachments
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company	)	Docket No. 20250011-EI
	)	
	)	Submitted for filing: June 9, 2025

DIRECT TESTIMONY OF

R. THOMAS BEACH

ON BEHALF OF EVGO SERVICES, LLC

JUNE 9, 2025

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I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. Please state your name, title and business address.

A. My name is R. Thomas Beach. I am principal consultant of the consulting firm Crossborder Energy. My business address is 2560 Ninth Street, Suite 213A, Berkeley, California 94710.

Q. Have you prepared a statement of your experience and qualifications?

A. Yes. My qualifications are described in the attached *curriculum vitae* (CV), which is included as Exhibit RTB-1 to this testimony. As documented in my CV, I have more than 40 years of experience on rate design and ratemaking issues for natural gas and electric utilities. I began my career in 1981 on the staff at the California Public Utility Commission (CPUC), working on the implementation of the Public Utilities Regulatory Policies Act of 1978 (PURPA). Since leaving the CPUC in 1989, I have had a private consulting practice on energy issues and have appeared, testified, or submitted testimony, studies, or reports on numerous occasions before state regulatory commissions in many states. My CV includes a list of the formal testimony that I have sponsored in state regulatory proceedings concerning electric and gas utilities. With respect to issues concerning commercial electric vehicle (EV) charging, I have testified on the design of commercial EV rates in Arizona, California, Massachusetts, New Jersey, and Texas.

Q. Have you previously testified before this Commission?

A. No, I have not.

Q. On whose behalf are you testifying in this proceeding?

A. I am appearing on behalf of EVgo Services, LLC (EVgo). EVgo is one of the nation's leading public fast charging providers. With more than 1,100 fast charging stations across

more than 40 states, EVgo strategically deploys localized and accessible charging infrastructure by partnering with leading businesses across the U.S., including retailers, grocery stores, restaurants, shopping centers, gas stations, rideshare operators, and autonomous vehicle companies. At its dedicated Innovation Lab, EVgo performs extensive interoperability testing and has ongoing technical collaborations with leading automakers and industry partners to advance the EV charging industry and deliver a seamless charging experience.

Under its owner-operator business model, EVgo develops, finances, owns, and operates its fast-charging network. EVgo works with site host partners across the country to deploy EV charging solutions at retail locations that are already part of customers' daily routines. EVgo installs the public direct current fast chargers (DCFC) at no cost to the site host partner. EVgo also maintains the customer relationship with the EV driver, providing a call center that is available to customers 24/7, and is responsible for operations and maintenance of its EV charging network.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide the Commission, the utility, and stakeholders with the unique perspective of an established owner-operator of EV charging infrastructure, with experience in more than 40 states including Florida, to ensure the Florida Power and Light's (FPL or "the Company")'s EV charging rates will achieve their desired policy objectives. My testimony addresses the following issues:

- FPL's rate riders for DCFC customers—the Electric Vehicle Charging Infrastructure Riders (GSD-1EV and GSLD-1EV).

- The price that FPL charges EV drivers at its utility-owned public fast-charging stations— the Utility-Owned Public Charging for Electric Vehicles Pilot (UEV).

Q. Please summarize your recommendations to the Commission in this proceeding.

A. On behalf of EVgo, my testimony recommends that the Commission:

- Direct FPL to modify the GSD-1EV and GSLD-1EV riders as detailed herein, to provide for a more graduated phase-in of demand charges for DCFC stations with load factors below 15%, using a rate design now employed by other utilities such as National Grid.
- Direct FPL to set pricing at its utility-owned chargers that is aligned with both (1) FPL's costs for these chargers, in order to fully recover FPL's costs and avoid subsidization by other ratepayers; and (2) current market pricing for fast-chargers in FPL's service territory.
    - Specifically, EVgo recommends that the UEV tariff price be set at $0.50 per kWh, not including applicable taxes and fees, which is aligned with the current market for EV fast-charging service in Florida and with the utility's stated costs to provide service at company-owned fast-charging stations.

Q. Do you sponsor any exhibits to your testimony?

A. Yes. I sponsor the following exhibits to my testimony:

- Exhibit RTB-1 – CV of R. Thomas Beach
- Exhibit RTB-2 – Selected Discovery Responses from FPL

II. BACKGROUND

Q. How can the electric rate design applicable to commercial EV charging station customers affect the deployment of such stations?

A. Electricity makes up a substantial portion of ongoing costs for EV charging stations, so the way electric rates are designed impacts the economic case for installing new infrastructure. Public DCFC infrastructure has a unique load profile that makes it distinct from other commercial customers. The demand charge component of traditional commercial rates can lead to disproportionately high effective dollar per kilowatt-hour (kWh) costs to operate DCFC, which creates a significant barrier to third-party investment in charging infrastructure.[1] Well-designed commercial EV rates that account for the unique loads of fast charging stations at this early stage of EV adoption is essential to achieve transportation electrification at scale.

Q. Please explain further the demand charge barrier.

A. Most electric utilities in the U.S. design their standard commercial electric rates with monthly demand charges that cover all or most of a utility's distribution costs. These demand charges are assessed based on the customer's maximum demand in any 15-, 30-, or 60-minute period each month. While a DCFC station may draw power at, or close to, its nameplate demand capacity at some point during each month, this level of power will not be sustained throughout the month. Further, the total monthly energy use at certain DCFC stations may be low during the early months of operation. This means EV fast-

[1] *See* EVgo, "The Costs of EV Fast Charging Infrastructure and Economic Benefits to Rapid Scale Up," Jonathan Levy, et al., (May 18, 2020), https://site-assets.evgo.com/f/78437/x/f28386ed92/2020-05-18_evgowhitepaper_dcfc-cost-and-policy.pdf at 11.

charging stations are likely to have lower load factors than typical commercial customers.[2]

Because station operators may be unable to spread the significant demand charges in standard commercial rates over large volumes of usage, demand charges result in high effective dollar per kWh costs for these customers. Even as load factors grow over time, the load factors of DCFC stations will continue to be lower than typical commercial customers—in part because operators will seek to avoid queuing at their stations which can degrade an EV driver's charging experience. In short, commercial rates with high monthly demand charges impact the economics of deploying and operating fast-charging infrastructure and present a barrier to development.

FPL clearly recognized this issue in its 2020 petition seeking approval of its Schedules GSD-1EV and GSLD-1EV pilot tariffs:

> FPL states that the current rate design poses a challenge to the economics of the public fast charging stations that experience a high demand and low levels of kWh energy sales, or utilization. At low levels of utilization, the electric bills incurred by the charging stations result in demand charges being spread over a relatively low volume of energy sales. This is referred to as a low load factor customer. Charging stations with higher kWh sales, i.e., high load factor customers are able to spread the billed demand cost over more energy sales and are, therefore, more likely to recover their costs.
>
> FPL asserts that the demand charge included in standard demand rate schedules creates a barrier to entry during the early years of the EV market.[3]

[2] The load factor is the ratio of the customer's average hourly usage over the billing period to its peak hourly usage based on the interval in which the customer's billed demand for the month is determined.

[3] *See* Docket No. 20200170-EI, Order No. PSC-2020-0512-TRF-EI (the 2020 CEV Order) at 6-7.

III. ELECTRIC VEHICLE CHARGING INFRASTRUCTURE RIDERS

Q. Please describe the Company's Electric Vehicle Charging Infrastructure Riders.

A. FPL's EV Charging Infrastructure riders (GSD-1EV and GSLD-1EV) were designed as an initial step to address the demand charge barrier, by setting an upper limit on a DCFC customer's maximum monthly demand that is used to determine the customer's monthly demand charge. This upper limit on the billed demand is calculated by dividing a customer's monthly energy usage by 75 hours. If the customer's actual maximum demand is higher than this upper limit, the upper limit is used for billing purposes. It is my understanding that the 75 hours were selected in order to prevent the customer's billed demand from going above the demand that is equivalent to about a 10% load factor in any month.[4] In other words, a DCFC customer with a load factor below 10% is billed a lower demand charge, calculated as though the station's load factor was exactly 10%. This places a floor on the DCFC customer's exposure to very high average costs for electricity at its low-load factor stations.

Q. What does the Company propose with regard to the pilot riders in this proceeding?

A. FPL proposes to make the current Schedule GSD-1EV and GSDLP-1EV riders permanent.

Q. What is your position on this proposal?

A. I believe that the rider has been helpful as a simple first step to reduce the demand charge barrier, and I appreciate FPL's initiative in proposing the pilot rider. However, as explained below, FPL should follow best practices from other utilities across the country that have successfully employed alternative rate structures for DCFC customers that have

[4] The math is (75 hours per month) x (12 months per year) / (8,760 hours per year) = 10.3%.

been effective in promoting EV adoption, supporting infrastructure investment, and realizing ratepayer benefits. Since 2020, only 76 locations have enrolled in FPL's riders despite the utility's large service territory which includes 231 fast-charging locations (excluding the FPL-owned charging stations).[5] As of March 2025, the riders currently benefited 40 locations,[6] or 17% of the non-FPL fast-charging locations in FPL's service territory. An improved permanent DCFC rate design would incentivize greater participation in areas with promising but unestablished demand, and thus promote the further build-out of the state's DCFC infrastructure.

Q. Please discuss your recommendation for a permanent DCFC rate design.

A. I commend FPL for their early leadership in establishing the pilot riders; however, since the Company proposed the riders, other utilities have demonstrated different rate structures that have been effective in recognizing the unique load of DCFCs and supporting further deployment. Thus, I recommend that the Schedule GSD-1EV and GSDLP-1EV riders be modified to use a rate structure similar to one implemented in the U.S. Northeast by the utility National Grid. National Grid has a DCFC rate structure with a series of discounts on the demand charge that are directly linked to the DCFC customer's load factor (see Table 1 below).[7] Below a 5% load factor, the rate is all-volumetric. For load factors between 5% and 10%, the demand charge is discounted by 75%. At load factors from 10% to 15%, the demand charge discount is 50%. The demand charge discounts are offset by correspondingly higher volumetric rates for distribution

[5] EVgo generated this by filtering the AFDC list of unrestricted DC fast chargers (accessed on June 4, 2025 at https://afdc.energy.gov/stations#/analyze?country=US&region=US-FL&fuel=ELEC&ev_levels=dc_fast&tab=location) to exclude FPL-owned sites and used a GIS software to retain only those located within FPL's service territory.

[6] Response to EVgo's First Set of Interrogatories, Interrogatory No. 6, included in Exhibit RTB-2.

[7] *See* https://www.nationalgridus.com/MA-Business/Rates/Service-Rates.

service. There is no reduction in the demand charge above a 15% load factor.[8] This structure provides stability in the average rate paid by the DCFC customer as its loads and load factors improve over time. The all-volumetric rate for stations with load factors below 5% is more supportive for new stations during their initial period of low usage, compared to the 10% demand limiter structure in FPL's pilot riders.

Table 1

Tier	Load Factor	Demand Charge Discount*	Estimated GSD-1 Energy Charge Adjustment ($/kWh)
1	0 - 5%	100%	$0.03786
2	5 - 10%	75%	$0.02839
3	10 - 15%	50%	$0.01893
4	> 15%	0%	$0

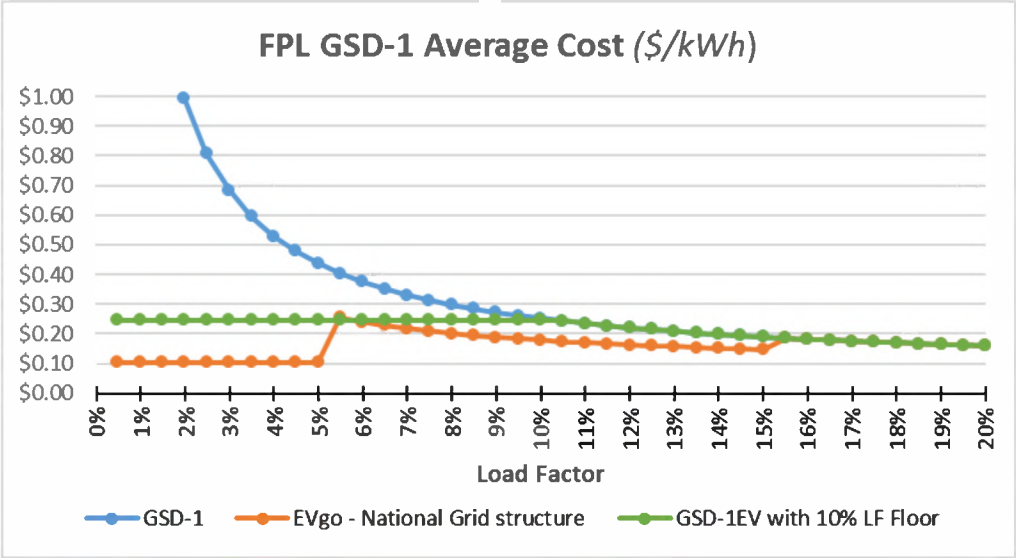
* The demand charge discount at each tier will be offset by the appropriate energy charge adjustment shown in the final column.

Q. Please compare your proposed DCFC rate structure to FPL's current pilot riders.

A. Figure 1 shows the average cost as a function of a station's load factor, for (1) the standard GSD-1 rate (blue line), (2) the current pilot GSD-1EV rider (green line), and (3) EVgo's proposed rate using the National Grid rate structure (orange line).

[8] For a full description of the National Grid rate, see Massachusetts Department of Public Utilities, Docket D.P.U. 21-91, National Grid, *Direct Testimony of Demand Charge Alternative Panel*, Exhibit NG-DCA-1 at https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13758109.

Figure 1



Q. Why is this modification in the public interest?

A. As illustrated in Figure 1, EVgo's recommended structure provides more support for stations with the lowest load factors, below 5%. It also provides modestly more support for stations with load factors in the 5% to 15% range, compared to the existing pilot rider structure. DCFC customers would pay the standard GSD-1 rate for load factors above 15%. This enhancement in the support for low-load-factor stations is in the public interest due to the continuing need to expand EV infrastructure in Florida to support the strong growth of the EV market in the state. All low-load-factor stations will benefit from this change, not just EVgo's. This proposal follows the practices of other utilities – National Grid, Arizona Public Service,[9] Madison Gas & Electric,[10] Dominion Energy in

[9] *See* Rate Rider DCFC, https://www.aps.com/-/media/APS/APSCOM-PDFs/Utility/Regulatory-and-Legal/Regulatory-Plan-Details-Tariffs/Business/Rate-Riders/dcfc_DirectCurrentFastCharging.pdf.

[10] *See* Sheet E-9.1 of https://www.mge.com/MGE/media/MGE-Library/documents/rates-electric/electric-rates-20241227.pdf.

Virginia,[11] and Public Service of Colorado[12] – that also offer commercial rates with reduced demand charges to commercial EV customers with low load factors, typically below 15%.

Q. Will providing this rate structure benefit FPL ratepayers?

A. Yes. Any revenues lost due to the reduction in the average rate paid by low-load-factor stations will be offset by load growth, and load growth will drive down rates for all ratepayers over time. As discussed by EVgo witness Garcia, a 2024 study by Synapse Energy Economics found that EVs contribute significantly more in utility revenues than costs, leading to downward pressure on rates across the country.[13] In Florida in particular, Synapse found that the revenues from EV adoption exceeded costs by $55.6 million between 2011 and 2021.[14] FPL found this to be the case with its existing EV riders as well, stating "[w]hile FPL shows demand-related revenue loss [of $204,000] in these early years, there is also $2.3 million in revenues collected from customers through these tariffs that may not have otherwise materialized."[15] I calculate that modifying the EV riders as EVgo recommends would have resulted in an increase of $49,000 in 2024 in the demand-related revenue loss, from $204,000 to $253,000. However, based on FPL's experience to date, the incremental revenues will continue to far exceed the reduced

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[11] *See* the GS-2 rate, with a waiver of demand charges for customers with monthly loads of less than 200 kWh per kW, https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/business-rates/schedule-gs2.pdf.

[12] *See* the Public Service of Colorado low load-factor rate, at Sheet 44 of its electric rate book, https://xcelnew.my.salesforce.com/sfc/p/1U0000011ttV/a/8b000002Y8xL/kYe61yf.9xyigvh2701Az49XLgU2izDS8ShGaCXiwsQ.

[13] Synapse Energy Economics, *Electric Vehicles Are Driving Rates Down for All Customers* (January 2024), https://www.synapse-energy.com/sites/default/files/Electric%20Vehicles%20Are%20Driving%20Rates%20Down%20for%20All%20Customer%20Update%20Jan%202024%2021-032.pdf at 3.

[14] Synapse Energy Economics, *EVs Are Driving Rates Down for All Customers: State-by-State Cumulative EV Net Rate Impact Summary* (June 2024), https://www.synapse-energy.com/sites/default/files/EV%20All%20State%20List%20PDF_0.pdf.

[15] 2024 CEV Report at 12 (Table 6).

demand charges.[16] This will support greater DCFC deployment which will lead to more incremental loads, and new revenues, for FPL, as well as downward pressure on rates for FPL's ratepayers. Furthermore, a robust public charging network is essential to support the even larger incremental revenues that FPL will receive from home and workplace charging of EVs.

IV. UTILITY-OWNED PUBLIC FAST-CHARGING PRICING

Q. Please describe the Company's UEV tariff.

A. Under this tariff, FPL has installed over 321 utility-owned fast charging ports in workplaces, tourist destinations, and other public spaces throughout its service territory. The utility now charges EV drivers $0.30 per kWh to charge at these facilities. This rate was set in 2020, in the 2020 CEV Order. The decision found that this rate was "market-based" at that time, and was reasonable in the absence of cost data for this new utility program:

> FPL asserts that one of the goals of its petition is to learn more about EV driver needs and gather more specific usage and cost data to allow FPL to develop cost-based rates for EV charging services. The proposed UEV tariff is not cost-based, but based on a "market-rate." Fast charging rates vary by provider, by location, and the level of charging offered. We find FPL's calculation of the proposed UEV rate to be appropriate for the limited purpose of this pilot and that traditional cost-of-service based rates cannot be accurately calculated at this early stage of utility-involvement in the EV market. We find that FPL's proposed market-based rate is reasonable in the limited context of approving pilot tariffs with the specific goal to collect cost and usage data for utility-owned fast charging stations.[17]

[16] This calculation is based on FPL's reported $204,000 revenue loss under the existing rider, scaled up by the additional discount from EVgo's proposed CEV rate structure, as shown in Figure 1 by the difference between the gray and orange lines at load factors below 15%.

[17] *See* 2020 CEV Order at 5.

Q. What has the Company proposed with regard to the UEV tariff?

A. The Company proposes to raise its pricing from $0.30 per kWh to $0.35 per kWh, asserting that such a rate "is market-based and comparable to the EV pricing options offered by non-utility providers."[18]

Q. How does FPL's proposed pricing compare to the pricing of other DCFC operators?

A. While I appreciate the Company's initiative in proposing to increase its pricing, FPL's proposed price is still well below the current market rate for EV fast charging in Florida. Based on data from a third-party survey of fast-charging prices in the state, the average current price is $0.48 per kWh, as of February 7, 2025.[19] This price is conservative (i.e. low) as a measure of the competitive market price, given that it appears to include FPL's utility-owned stations that offer the current below-market price of $0.30 per kWh. FPL owns about 20% of the fast-charging locations in its service territory.[20] In other words, a survey of market prices that excludes FPL's utility-owned stations would likely result in an even higher price.

Q. Is cost data now available on FPL's utility-owned fast-charging stations?

A. Yes. The 2024 EV Report shows that the 2024 costs for FPL's public fast-charging program were $0.51 per kWh.[21] Notably, FPL's revenues from fast charging were $0.30 per kWh, so other ratepayers subsidized FPL's fast-charging stations in 2024 by $0.21 per kWh, or $2.387 million.[22] This subsidy is more than ten times the reduced demand

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[18] *See* Docket 20240025-EI, *Direct Testimony of Tim Oliver* at 36.

[19] *See* Stable Auto's survey of Level 3 fast-charging prices in Florida, https://stable.auto/insights/electric-vehicle-charger-price-by-state (last updated Feb. 7, 2025).

[20] Based on the AFDC data discussed in Footnote 5, above.

[21] *See* 2024 CEV Report, at Attachment 1, page 1. This attachment shows a 2024 revenue requirement of $5.741 million to supply 11.162 million kWh at the Company-owned fast-charging stations.

[22] *Id.* FPL's fast-charging revenues in 2024 were $3.354 million. The 2024 revenue requirement of $5.741 million less revenues of $3.354 million yields a subsidy of $2.387 million in 2024.

charge revenues in 2024 due to the demand limiter in the GSD-1EV and GSDLP-1EV riders.[23]

Q. Why is it important for the Commission to consider the utility's cost in setting the rate for the UEV tariff?

A. There are several reasons the Commission should consider the utility's cost in determining the UEV tariff.

First, as I explained previously, the Commission stated "[w]e find FPL's calculation of the proposed UEV rate to be appropriate for the **limited purpose of this pilot** and that traditional cost-of-service based rates cannot be accurately calculated at this early stage of utility-involvement in the EV market."[24] The Commission clearly intended that market-based pricing be allowed for the pilot only, and implied that once cost data is available, it should be used to determine pricing moving forward.

Second, as I explained previously, the general body of ratepayers are currently subsidizing a portion of the costs of utility-owned charging stations. In 2024, this amounted to $2.387 million. Setting the UEV tariff in a way that ensures that it will recover the utility's costs will relieve this burden on ratepayers.

Finally, considering the utility's costs in determining the UEV tariff will create a more even playing field, thus driving private investment in EV charging in the Company's territory. Private sector DCFC providers must charge prices that reflect the full cost stack of DCFC which includes not only electricity, but also maintenance, a customer call center, and other development and operations costs. If utilities are able to charge a lower price because they can recover a portion of their EV-related costs, such as

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[23] *Id.* at Table 6, showing the "demand limiter offset" of $204,390 in 2024.
[24] *See* 2020 CEV Order at 5.

development, financing, and operations costs, from non-EV customers, the Commission risks creating an uneven playing field that may discourage future private investment in EV infrastructure. Further, it may undermine existing private investments, as EV drivers may be more likely to charge at utility stations with below-market prices that are subsidized by ratepayers.

Q. What do you recommend with regard to the UEV tariff?

A. I recommend that the Commission direct FPL to set pricing at its utility-owned chargers that is aligned with both (1) FPL's costs for these chargers, in order to fully recover FPL's costs and avoid subsidization by other ratepayers; and (2) current market pricing for fast-chargers in FPL's service territory, in order to avoid distorting the EV charging market.

Specifically, I recommend the UEV tariff be set at $0.50 per kWh, not including applicable taxes and fees. This pricing balances the conservative market survey price of $0.48 per kWh and FPL's 2024 fast-charging costs of $0.51 per kWh. If FPL disagrees with this price, we suggest they do their own survey of market prices, subject to stakeholder input, in line with best practice.

Q. Have other Commissions sought to ensure that the pricing of utility-owned fast-charging was in line with market pricing?

A. Yes, Xcel Energy in Colorado provides one example. The issue of pricing for utility-owned DCFC stations went through a fully litigated process before the Colorado Public Service Commission in 2021 and 2022 in Proceeding No. 21AL-0494E. Similar to FPL, the utility proposed to charge EV drivers below market pricing at its utility-owned DCFC

stations.[25] In the end, the Colorado Commission considered two distinct proposals from parties for pricing at Xcel's utility-owned DCFC stations. The first was presented in a settlement between Xcel Energy and PUC Staff ("Settlement Agreement").[26] The second was presented by parties as a Stipulation ("First Stipulation") and consisted of higher pricing to align with the average DCFC pricing in the competitive market in order to avoid discouraging private investment in the state.[27] The Colorado Commission ultimately adopted the pricing from the First Stipulation, concluding that the alternative "rates in the Settlement Agreement risk undercutting competition and causing a decline, or at least limiting the growth, in the deployment of DCFC stations by commercial EV charging companies."[28] The Colorado Commission also provided general direction regarding pricing at utility owned stations and supported pricing that is in line with the private market, stating, "[i]n adopting rates at this stage, we remain mindful that the risk of utility-owned stations charging below-market rates could hamper the further development of private charging stations in these areas that are critical to enhance consumer confidence that EV charging is readily available."[29]

V. SUMMARY OF RECOMMENDATIONS

Q. Please summarize your recommendations to the Commission.

A. I recommend that the Commission:

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[25] Colorado Public Utilities Commission, Proceeding No. 21AL-0494E. Xcel Energy's original proposal would have put the blended rates at $0.17 per kWh and $0.34 per kWh depending on whether the station was rural or urban.

[26] Proceeding No. 21AL-0494E, Decision No. R22-0378 at ¶ 95.

[27] *Id.* at ¶ 96.

[28] Proceeding No. 21AL-0494E, Decision No. C22-0485 at ¶ 26.

[29] *Id.*

- Direct FPL to modify the GSD-1EV and GSLD-1EV riders as detailed herein, to provide for a more graduated phase-in of demand charges for DCFC stations with load factors below 15%, using a rate design now employed by other utilities such as National Grid.
- Direct FPL to set pricing at its utility-owned chargers that is aligned with both (1) FPL's costs for these chargers, in order to fully recover FPL's costs and avoid subsidization by other ratepayers; and (2) current market pricing for fast-chargers in FPL's service territory, in order to avoid distorting the EV charging market.
    - Specifically, EVgo recommends that the UEV tariff price be set at $0.50 per kWh, not including applicable taxes and fees, which is aligned with the current market for EV fast-charging service in Florida and with the utility's stated costs to provide service at company-owned fast-charging stations.

Q. Does this conclude your direct testimony?

A. Yes, it does.

R. THOMAS BEACH
Principal Consultant

Mr. Beach is principal consultant with the consulting firm Crossborder Energy. Crossborder Energy provides economic consulting services and strategic advice on market and regulatory issues concerning the natural gas and electric industries. The firm is based in Berkeley, California, and its practice focuses on the energy markets in California, the U.S., and Canada.

Since 1989, Mr. Beach has had an active consulting practice on policy, economic, and ratemaking issues concerning renewable energy development, the restructuring of the gas and electric industries, the addition of new natural gas pipeline and storage capacity, and a wide range of issues concerning independent power generation. From 1981 through 1989 he served at the California Public Utilities Commission, including five years as an advisor to three CPUC commissioners. While at the CPUC, he was a key advisor on the CPUC's restructuring of the natural gas industry in California, and worked extensively on the state's implementation of the Public Utilities Regulatory Policies Act of 1978.

AREAS OF EXPERTISE

- *Renewable Energy Issues:* extensive experience assisting clients with issues concerning Renewable Portfolio Standard programs, including program structure and rate impacts. He has also worked for the solar industry on rate design and net energy metering issues, on the creation of the California Solar Initiative, as well as on a wide range of solar issues in many other states.

- *Restructuring the Natural Gas and Electric Industries:* consulting and expert testimony on numerous issues involving the restructuring of the electric industry, including the 2000 - 2001 Western energy crisis.

- *Energy Markets:* studies and consultation on the dynamics of natural gas and electric markets, including the impacts of new pipeline capacity on natural gas prices and of electric restructuring on wholesale electric prices.

- *Qualifying Facility Issues:* consulting with QF clients on a broad range of issues involving independent power facilities in the Western U.S. He is one of the leading experts in California on the calculation of avoided cost prices. Other QF issues on which he has worked include complex QF contract restructurings, standby rates, greenhouse gas emission regulations, and natural gas rates for cogenerators. Crossborder Energy's QF clients include the full range of QF technologies, both fossil-fueled and renewable.

- *Pricing Policy in Regulated Industries:* consulting and expert testimony on natural gas pipeline rates and on marginal cost-based rates for natural gas and electric utilities.

EDUCATION

Mr. Beach holds a B.A. in English and physics from Dartmouth College, and an M.E. in mechanical engineering from the University of California at Berkeley.

ACADEMIC HONORS

Graduated from Dartmouth with high honors in physics and honors in English.
Chevron Fellowship, U.C. Berkeley, 1978-79

PROFESSIONAL ACCREDITATION

Registered professional engineer in the state of California.

EXPERT WITNESS TESTIMONY BEFORE THE CALIFORNIA PUBLIC UTILITIES COMMISSION

1. Prepared Direct Testimony on Behalf of **Pacific Gas & Electric Company/Pacific Gas Transmission** (I. 88-12-027 — July 15, 1989)

   - *Competitive and environmental benefits of new natural gas pipeline capacity to California.*

2. a. Prepared Direct Testimony on Behalf of the **Canadian Producer Group** (A. 89-08-024 — November 10, 1989)
   b. Prepared Rebuttal Testimony on Behalf of the **Canadian Producer Group** (A. 89-08-024 — November 30, 1989)

   - *Natural gas procurement policy; gas cost forecasting.*

3. Prepared Direct Testimony on Behalf of the **Canadian Producer Group** (R. 88-08-018 — December 7, 1989)

   - *Brokering of interstate pipeline capacity.*

4. Prepared Direct Testimony on Behalf of the **Canadian Producer Group** (A. 90-08-029 — November 1, 1990)

   - *Natural gas procurement policy; gas cost forecasting; brokerage fees.*

5. Prepared Direct Testimony on Behalf of the **Alberta Petroleum Marketing Commission and the Canadian Producer Group** (I. 86-06-005 — December 21, 1990)

   - *Firm and interruptible rates for noncore natural gas users*

6. a. Prepared Direct Testimony on Behalf of the **Alberta Petroleum Marketing Commission** (R. 88-08-018 — January 25, 1991)
   b. Prepared Responsive Testimony on Behalf of the **Alberta Petroleum Marketing Commission** (R. 88-08-018 — March 29, 1991)

   - *Brokering of interstate pipeline capacity; intrastate transportation policies.*

7. Prepared Direct Testimony on Behalf of the **Canadian Producer Group** (A. 90-08-029/Phase II — April 17, 1991)

   - *Natural gas brokerage and transport fees.*

8. Prepared Direct Testimony on Behalf of **LUZ Partnership Management** (A. 91-01-027 — July 15, 1991)

   - *Natural gas parity rates for cogenerators and solar thermal power plants.*

9. Prepared Joint Testimony of R. Thomas Beach and Dr. Robert B. Weisenmiller on Behalf of the **California Cogeneration Council** (I. 89-07-004 — July 15, 1991)

   - *Avoided cost pricing; use of published natural gas price indices to set avoided cost prices for qualifying facilities.*

10. a. Prepared Direct Testimony on Behalf of the **Indicated Expansion Shippers** (A. 89-04-033 — October 28, 1991)
    b. Prepared Rebuttal Testimony on Behalf of the **Indicated Expansion Shippers** (A. 89-04-0033 — November 26,1991)

    - *Natural gas pipeline rate design; cost/benefit analysis of rolled-in rates.*

11. Prepared Direct Testimony on Behalf of the **Independent Petroleum Association of Canada** (A. 91-04-003 — January 17, 1992)

    - *Natural gas procurement policy; prudence of past gas purchases.*

12. a. Prepared Direct Testimony on Behalf of the **California Cogeneration Council** (I.86-06-005/Phase II — June 18, 1992)
    b. Prepared Rebuttal Testimony on Behalf of the **California Cogeneration Council** (I. 86-06-005/Phase II — July 2, 1992)

    - *Long-Run Marginal Cost (LRMC) rate design for natural gas utilities.*

13. Prepared Direct Testimony on Behalf of the **California Cogeneration Council** (A. 92-10-017 — February 19, 1993)

    - *Performance-based ratemaking for electric utilities.*

14. Prepared Direct Testimony on Behalf of the **SEGS Projects** (C. 93-02-014/A. 93-03-053 — May 21, 1993)

    - *Natural gas transportation service for wholesale customers.*

15 a. Prepared Direct Testimony on Behalf of the **Canadian Association of Petroleum Producers** (A. 92-12-043/A. 93-03-038 — June 28, 1993)
   b. Prepared Rebuttal Testimony of Behalf of the **Canadian Association of Petroleum Producers** (A. 92-12-043/A. 93-03-038 — July 8, 1993)

    - *Natural gas pipeline rate design issues.*

16. a. Prepared Direct Testimony on Behalf of the **SEGS Projects** (C. 93-05-023 — November 10, 1993)
    b. Prepared Rebuttal Testimony on Behalf of the **SEGS Projects** (C. 93-05-023 — January 10, 1994)

    - *Utility overcharges for natural gas service; cogeneration parity issues.*

17. Prepared Direct Testimony on Behalf of the **City of Vernon** (A. 93-09-006/A. 93-08-022/A. 93-09-048 — June 17, 1994)

    - *Natural gas rate design for wholesale customers; retail competition issues.*

18. Prepared Direct Testimony of R. Thomas Beach on Behalf of the **SEGS Projects** (A. 94-01-021 — August 5, 1994)

    - *Natural gas rate design issues; rate parity for solar thermal power plants.*

19. Prepared Direct Testimony on Transition Cost Issues on Behalf of **Watson Cogeneration Company** (R. 94-04-031/I. 94-04-032 — December 5, 1994)

    - *Policy issues concerning the calculation, allocation, and recovery of transition costs associated with electric industry restructuring.*

20. Prepared Direct Testimony on Nuclear Cost Recovery Issues on Behalf of the **California Cogeneration Council** (A. 93-12-025/I. 94-02-002 — February 14, 1995)

    - *Recovery of above-market nuclear plant costs under electric restructuring.*

21. Prepared Direct Testimony on Behalf of the **Sacramento Municipal Utility District** (A. 94-11-015 — June 16, 1995)

    - *Natural gas rate design; unbundled mainline transportation rates.*

22. Prepared Direct Testimony on Behalf of **Watson Cogeneration Company** (A. 95-05-049 — September 11, 1995)

    - *Incremental Energy Rates; air quality compliance costs.*

23. a. Prepared Direct Testimony on Behalf of the **Canadian Association of Petroleum Producers** (A. 92-12-043/A. 93-03-038/A. 94-05-035/A. 94-06-034/A. 94-09-056/A. 94-06-044 — January 30, 1996)
    b. Prepared Rebuttal Testimony on Behalf of the **Canadian Association of Petroleum Producers** (A. 92-12-043/A. 93-03-038/A. 94-05-035/A. 94-06-034/A. 94-09-056/A. 94-06-044 — February 28, 1996)

    - *Natural gas market dynamics; gas pipeline rate design.*

24. Prepared Direct Testimony on Behalf of the **California Cogeneration Council and Watson Cogeneration Company** (A. 96-03-031 — July 12, 1996)

    - *Natural gas rate design: parity rates for cogenerators.*

25. Prepared Direct Testimony on Behalf of the **City of Vernon** (A. 96-10-038 — August 6, 1997)

    - *Impacts of a major utility merger on competition in natural gas and electric markets.*

26. a. Prepared Direct Testimony on Behalf of the **Electricity Generation Coalition** (A. 97-03-002 — December 18, 1997)
    b. Prepared Rebuttal Testimony on Behalf of the **Electricity Generation Coalition** (A. 97-03-002 — January 9, 1998)

    - *Natural gas rate design for gas-fired electric generators.*

27. Prepared Direct Testimony on Behalf of the **City of Vernon** (A. 97-03-015 — January 16, 1998)

    - *Natural gas service to Baja, California, Mexico.*

28. a. Prepared Direct Testimony on Behalf of the **California Cogeneration Council and Watson Cogeneration Company** (A. 98-10-012/A. 98-10-031/A. 98-07-005 — March 4, 1999).
    b. Prepared Direct Testimony on Behalf of the **California Cogeneration Council** (A. 98-10-012/A. 98-01-031/A. 98-07-005 — March 15, 1999).
    c. Prepared Direct Testimony on Behalf of the **California Cogeneration Council** (A. 98-10-012/A. 98-01-031/A. 98-07-005 — June 25, 1999).

    - *Natural gas cost allocation and rate design for gas-fired electric generators.*

29. a. Prepared Direct Testimony on Behalf of the **California Cogeneration Council and Watson Cogeneration Company** (R. 99-11-022 — February 11, 2000).
    b. Prepared Rebuttal Testimony on Behalf of the **California Cogeneration Council and Watson Cogeneration Company** (R. 99-11-022 — March 6, 2000).
    c. Prepared Direct Testimony on Line Loss Issues of behalf of the **California Cogeneration Council** (R. 99-11-022 — April 28, 2000).
    d. Supplemental Direct Testimony in Response to ALJ Cooke's Request on behalf of the **California Cogeneration Council and Watson Cogeneration Company** (R. 99-11-022 — April 28, 2000).
    e. Prepared Rebuttal Testimony on Line Loss Issues on behalf of the **California Cogeneration Council** (R. 99-11-022 — May 8, 2000).

    - *Market-based, avoided cost pricing for the electric output of gas-fired cogeneration facilities in the California market; electric line losses.*

30. a. Direct Testimony on behalf of the **Indicated Electric Generators** in Support of the Comprehensive Gas OII Settlement Agreement for Southern California Gas Company and San Diego Gas & Electric Company (I. 99-07-003 — May 5, 2000).
    b. Rebuttal Testimony in Support of the Comprehensive Settlement Agreement on behalf of the **Indicated Electric Generators** (I. 99-07-003 — May 19, 2000).

    - *Testimony in support of a comprehensive restructuring of natural gas rates and services on the Southern California Gas Company system. Natural gas cost allocation and rate design for gas-fired electric generators.*

31. a. Prepared Direct Testimony on the Cogeneration Gas Allowance on behalf of the **California Cogeneration Council** (A. 00-04-002 — September 1, 2000).
    b. Prepared Direct Testimony on behalf of **Southern Energy California** (A. 00-04-002 — September 1, 2000).

    - *Natural gas cost allocation and rate design for gas-fired electric generators.*

32. a. Prepared Direct Testimony on behalf of **Watson Cogeneration Company** (A. 00-06-032 — September 18, 2000).
    b. Prepared Rebuttal Testimony on behalf of **Watson Cogeneration Company** (A. 00-06-032 — October 6, 2000).

    - *Rate design for a natural gas "peaking service."*

33. a. Prepared Direct Testimony on behalf of **PG&E National Energy Group & Calpine Corporation** (I. 00-11-002—April 25, 2001).
    b. Prepared Rebuttal Testimony on behalf of **PG&E National Energy Group & Calpine Corporation** (I. 00-11-002—May 15, 2001).

    - *Terms and conditions of natural gas service to electric generators; gas curtailment policies.*

34. a. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (R. 99-11-022—May 7, 2001).
    b. Prepared Rebuttal Testimony on behalf of the **California Cogeneration Council** (R. 99-11-022—May 30, 2001).

    - *Avoided cost pricing for alternative energy producers in California.*

35. a. Prepared Direct Testimony of R. Thomas Beach in Support of the Application of **Wild Goose Storage Inc.** (A. 01-06-029—June 18, 2001).
    b. Prepared Rebuttal Testimony of R. Thomas Beach on behalf of **Wild Goose Storage** (A. 01-06-029—November 2, 2001)

    - *Consumer benefits from expanded natural gas storage capacity in California.*

36. Prepared Direct Testimony on behalf of the **County of San Bernardino** (I. 01-06-047—December 14, 2001)

    - *Reasonableness review of a natural gas utility's procurement practices and storage operations.*

37. a. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (R. 01-10-024—May 31, 2002)
    b. Prepared Supplemental Testimony on behalf of the **California Cogeneration Council** (R. 01-10-024—May 31, 2002)

    - *Electric procurement policies for California's electric utilities in the aftermath of the California energy crisis.*

38. Prepared Direct Testimony on behalf of the **California Manufacturers & Technology Association** (R. 02-01-011—June 6, 2002)

    - *"Exit fees" for direct access customers in California.*

39. Prepared Direct Testimony on behalf of the **County of San Bernardino** (A. 02-02-012 — August 5, 2002)

    - *General rate case issues for a natural gas utility; reasonableness review of a natural gas utility's procurement practices.*

40. Prepared Direct Testimony on behalf of the **California Manufacturers and Technology Association** (A. 98-07-003 — February 7, 2003)

    - *Recovery of past utility procurement costs from direct access customers.*

41. a. Prepared Direct Testimony on behalf of the **California Cogeneration Council, the California Manufacturers & Technology Association, Calpine Corporation, and Mirant Americas, Inc.** (A 01-10-011 — February 28, 2003)
    b. Prepared Rebuttal Testimony on behalf of the **California Cogeneration Council, the California Manufacturers & Technology Association, Calpine Corporation, and Mirant Americas, Inc.** (A 01-10-011 — March 24, 2003)

    - *Rate design issues for Pacific Gas & Electric's gas transmission system (Gas Accord II).*

42. a. Prepared Direct Testimony on behalf of the **California Manufacturers & Technology Association; Calpine Corporation; Duke Energy North America; Mirant Americas, Inc.; Watson Cogeneration Company; and West Coast Power, Inc.** (R. 02-06-041 — March 21, 2003)
    b. Prepared Rebuttal Testimony on behalf of the **California Manufacturers & Technology Association; Calpine Corporation; Duke Energy North America; Mirant Americas, Inc.; Watson Cogeneration Company; and West Coast Power, Inc.** (R. 02-06-041 — April 4, 2003)

    - *Cost allocation of above-market interstate pipeline costs for the California natural gas utilities.*

43. Prepared Direct Testimony of R. Thomas Beach and Nancy Rader on behalf of the **California Wind Energy Association** (R. 01-10-024 — April 1, 2003)

    - *Design and implementation of a Renewable Portfolio Standard in California.*

44. a. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (R. 01-10-024 — June 23, 2003)
    b. Prepared Supplemental Testimony on behalf of the **California Cogeneration Council** (R. 01-10-024 — June 29, 2003)

    - *Power procurement policies for electric utilities in California.*

45. Prepared Direct Testimony on behalf of the **Indicated Commercial Parties** (02-05-004 — August 29, 2003)

    - *Electric revenue allocation and rate design for commercial customers in southern California.*

46. a. Prepared Direct Testimony on behalf of **Calpine Corporation and the California Cogeneration Council** (A. 04-03-021 — July 16, 2004)
    b. Prepared Rebuttal Testimony on behalf of **Calpine Corporation and the California Cogeneration Council** (A. 04-03-021 — July 26, 2004)

    - *Policy and rate design issues for Pacific Gas & Electric's gas transmission system (Gas Accord III).*

47. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (A. 04-04-003 — August 6, 2004)

    - *Policy and contract issues concerning cogeneration QFs in California.*

48. a. Prepared Direct Testimony on behalf of the **California Cogeneration Council and the California Manufacturers and Technology Association** (A. 04-07-044 — January 11, 2005)
    b. Prepared Rebuttal Testimony on behalf of the **California Cogeneration Council and the California Manufacturers and Technology Association** (A. 04-07-044 — January 28, 2005)

    - *Natural gas cost allocation and rate design for large transportation customers in northern California.*

49. a. Prepared Direct Testimony on behalf of the **California Manufacturers and Technology Association and the Indicated Commercial Parties** (A. 04-06-024 — March 7, 2005)
    b. Prepared Rebuttal Testimony on behalf of the **California Manufacturers and Technology Association and the Indicated Commercial Parties** (A. 04-06-024 — April 26, 2005)

    - *Electric marginal costs, revenue allocation, and rate design for commercial and industrial electric customers in northern California.*

50. Prepared Direct Testimony on behalf of the **California Solar Energy Industries Association** (R. 04-03-017 — April 28, 2005)

    - *Cost-effectiveness of the Million Solar Roofs Program.*

51. Prepared Direct Testimony on behalf of **Watson Cogeneration Company, the Indicated Producers, and the California Manufacturing and Technology Association** (A. 04-12-004 — July 29, 2005)

    - *Natural gas rate design policy; integration of gas utility systems.*

52. a. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (R. 04-04-003/R. 04-04-025 — August 31, 2005)
    b. Prepared Rebuttal Testimony on behalf of the **California Cogeneration Council** (R. 04-04-003/R. 04-04-025 — October 28, 2005)

    - *Avoided cost rates and contracting policies for QFs in California*

53. a. Prepared Direct Testimony on behalf of the **California Manufacturers and Technology Association and the Indicated Commercial Parties** (A. 05-05-023 — January 20, 2006)
    b. Prepared Rebuttal Testimony on behalf of the **California Manufacturers and Technology Association and the Indicated Commercial Parties** (A. 05-05-023 — February 24, 2006)

    - *Electric marginal costs, revenue allocation, and rate design for commercial and industrial electric customers in southern California.*

54. a. Prepared Direct Testimony on behalf of the **California Producers** (R. 04-08-018 – January 30, 2006)
    b. Prepared Rebuttal Testimony on behalf of the **California Producers** (R. 04-08-018 – February 21, 2006)

    - *Transportation and balancing issues concerning California gas production.*

55. Prepared Direct Testimony on behalf of the **California Manufacturers and Technology Association and the Indicated Commercial Parties** (A. 06-03-005 — October 27, 2006)

    - *Electric marginal costs, revenue allocation, and rate design for commercial and industrial electric customers in northern California.*

56. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (A. 05-12-030 — March 29, 2006)

    - *Review and approval of a new contract with a gas-fired cogeneration project.*

57. a. Prepared Direct Testimony on behalf of **Watson Cogeneration, Indicated Producers, the California Cogeneration Council, and the California Manufacturers and Technology Association** (A. 04-12-004 — July 14, 2006)
    b. Prepared Rebuttal Testimony on behalf of **Watson Cogeneration, Indicated Producers, the California Cogeneration Council, and the California Manufacturers and Technology Association** (A. 04-12-004 — July 31, 2006)

    - *Restructuring of the natural gas system in southern California to include firm capacity rights; unbundling of natural gas services; risk/reward issues for natural gas utilities.*

58. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (R. 06-02-013 — March 2, 2007)

    - *Utility procurement policies concerning gas-fired cogeneration facilities.*

59. a. Prepared Direct Testimony on behalf of the **Solar Alliance** (A. 07-01-047 — August 10, 2007)
    b. Prepared Rebuttal Testimony on behalf of the **Solar Alliance** (A. 07-01-047 — September 24, 2007)

    - *Electric rate design issues that impact customers installing solar photovoltaic systems.*

60. a. Prepared Direct Testimony on Behalf of **Gas Transmission Northwest Corporation** (A. 07-12-021 — May 15, 2008)
    b. Prepared Rebuttal Testimony on Behalf of **Gas Transmission Northwest Corporation** (A. 07-12-021 — June 13, 2008)

    - *Utility subscription to new natural gas pipeline capacity serving California.*

61. a. Prepared Direct Testimony on behalf of the **Solar Alliance** (A. 08-03-015 — September 12, 2008)
    b. Prepared Rebuttal Testimony on behalf of the **Solar Alliance** (A. 08-03-015 — October 3, 2008)

    - *Issues concerning the design of a utility-sponsored program to install 500 MW of utility- and independently-owned solar photovoltaic systems.*

62. Prepared Direct Testimony on behalf of the **Solar Alliance** (A. 08-03-002 — October 31, 2008)

    - *Electric rate design issues that impact customers installing solar photovoltaic systems.*

63. a. Phase II Direct Testimony on behalf of **Indicated Producers, the California Cogeneration Council, California Manufacturers and Technology Association, and Watson Cogeneration Company** (A. 08-02-001 — December 23, 2008)
    b. Phase II Rebuttal Testimony on behalf of **Indicated Producers, the California Cogeneration Council, California Manufacturers and Technology Association, and Watson Cogeneration Company** (A. 08-02-001 — January 27, 2009)

    - *Natural gas cost allocation and rate design issues for large customers.*

64. a. Prepared Direct Testimony on behalf of the **California Cogeneration Council** (A. 09-05-026 — November 4, 2009)

    - *Natural gas cost allocation and rate design issues for large customers.*

65. a. Prepared Direct Testimony on behalf of **Indicated Producers and Watson Cogeneration Company** (A. 10-03-028 — October 5, 2010)
    b. Prepared Rebuttal Testimony on behalf of **Indicated Producers and Watson Cogeneration Company** (A. 10-03-028 — October 26, 2010)

    - *Revisions to a program of firm backbone capacity rights on natural gas pipelines.*

66. Prepared Direct Testimony on behalf of the **Solar Alliance** (A. 10-03-014 — October 6, 2010)

    - *Electric rate design issues that impact customers installing solar photovoltaic systems.*

67. Prepared Rebuttal Testimony on behalf of the **Indicated Settling Parties** (A. 09-09-013 — October 11, 2010)

    - *Testimony on proposed modifications to a broad-based settlement of rate-related issues on the Pacific Gas & Electric natural gas pipeline system.*

68. a. Supplemental Prepared Direct Testimony on behalf of **Sacramento Natural Gas Storage, LLC** (A. 07-04-013 — December 6, 2010)
    b. Supplemental Prepared Rebuttal Testimony on behalf of **Sacramento Natural Gas Storage, LLC** (A. 07-04-013 — December 13, 2010)
    c. Supplemental Prepared Reply Testimony on behalf of **Sacramento Natural Gas Storage, LLC** (A. 07-04-013 — December 20, 2010)

    - *Local reliability benefits of a new natural gas storage facility.*

69. Prepared Direct Testimony on behalf of **The Vote Solar Initiative** (A. 10-11-015—June 1, 2011)

    - *Distributed generation policies; utility distribution planning.*

70. Prepared Reply Testimony on behalf of the **Solar Alliance** (A. 10-03-014—August 5, 2011)

    - *Electric rate design for commercial & industrial solar customers.*

71. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 11-06-007—February 6, 2012)

    - *Electric rate design for solar customers; marginal costs.*

72. a. Prepared Direct Testimony on behalf of the **Northern California Indicated Producers** (R.11-02-019—January 31, 2012)
    b. Prepared Rebuttal Testimony on behalf of the **Northern California Indicated Producers** (R. 11-02-019—February 28, 2012)

    - *Natural gas pipeline safety policies and costs*

73. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 11-10-002—June 12, 2012)

    - *Electric rate design for solar customers; marginal costs.*

74. Prepared Direct Testimony on behalf of the **Southern California Indicated Producers** and **Watson Cogeneration Company** (A. 11-11-002—June 19, 2012)

    - *Natural gas pipeline safety policies and costs*

75. a. Testimony on behalf of the **California Cogeneration Council** (R. 12-03-014—June 25, 2012)
    b. Reply Testimony on behalf of the **California Cogeneration Council** (R. 12-03-014—July 23, 2012)

    - *Ability of combined heat and power resources to serve local reliability needs in southern California.*

76. a. Prepared Testimony on behalf of the **Southern California Indicated Producers** and **Watson Cogeneration Company** (A. 11-11-002, Phase 2—November 16, 2012)
    b. Prepared Rebuttal Testimony on behalf of the **Southern California Indicated Producers** and **Watson Cogeneration Company** (A. 11-11-002, Phase 2—December 14, 2012)

    - *Allocation and recovery of natural gas pipeline safety costs.*

77. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 12-12-002—May 10, 2013)

    - *Electric rate design for commercial & industrial solar customers; marginal costs.*

78. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 13-04-012—December 13, 2013)

    - *Electric rate design for commercial & industrial solar customers; marginal costs.*

79. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 13-12-015—June 30, 2014)

    - *Electric rate design for commercial & industrial solar customers; residential time-of-use rate design issues.*

80. a. Prepared Direct Testimony on behalf of **Calpine Corporation** and the **Indicated Shippers** (A. 13-12-012—August 11, 2014)
    b. Prepared Direct Testimony on behalf of **Calpine Corporation, the Canadian Association of Petroleum Producers, Gas Transmission Northwest,** and **the City of Palo Alto** (A. 13-12-012—August 11, 2014)
    c. Prepared Rebuttal Testimony on behalf of **Calpine Corporation** (A. 13-12-012—September 15, 2014)
    d. Prepared Rebuttal Testimony on behalf of **Calpine Corporation, the Canadian Association of Petroleum Producers, Gas Transmission Northwest,** and **the City of Palo Alto** (A. 13-12-012—September 15, 2014)

    - *Rate design, cost allocation, and revenue requirement issues for the gas transmission system of a major natural gas utility.*

81. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (R. 12-06-013—September 15, 2014)

    - *Comprehensive review of policies for rate design for residential electric customers in California.*

82. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 14-06-014—March 13, 2015)

    - *Electric rate design for commercial & industrial solar customers; marginal costs.*

83. a. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A.14-11-014—May 1, 2015)
    b. Prepared Rebuttal Testimony on behalf of the **Solar Energy Industries Association** (A. 14-11-014—May 26, 2015)

    - *Time-of-use periods for residential TOU rates.*

84. Prepared Rebuttal Testimony on behalf of the **Joint Solar Parties** (R. 14-07-002 — September 30, 2015)

    - *Electric rate design issues concerning proposals for the net energy metering successor tariff in California.*

85. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 15-04-012—July 5, 2016)

    - *Selection of Time-of-Use periods, and rate design issues for solar customers.*

86. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 16-09-003 — April 28, 2017)

- *Selection of Time-of-Use periods, and rate design issues for solar customers.*

87. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 17-06-030 — March 23, 2018)

- *Selection of Time-of-Use periods, and rate design issues for solar customers.*

88. Prepared Direct and Rebuttal Testimony on behalf of **Calpine Corporation** (A. 17-11-009 – July 20 and August 20, 2018)

- *Gas transportation rates for electric generators, gas storage and balancing issues*

89. Prepared Direct Testimony on behalf of **Gas Transmission Northwest LLC** and the **City of Palo Alto** (A. 17-11-009 – July 20, 2018)

- *Rate design for intrastate backbone gas transportation rates*

90. Prepared Direct Testimony on behalf of **EVgo** (A. 18-11-003 – April 5, 2019)

- *Electric rate design for commercial electric vehicle charging*

91. Prepared Direct and Rebuttal Testimony on behalf of **Vote Solar** and the **Solar Energy Industries Association** (R. 14-10-003 — October 7 and 21, 2019)

- *Avoided cost issues for distributed energy resources*

92. Prepared Direct and Rebuttal Testimony on behalf of **EVgo** (A. 19-07-006 – January 13 and February 20, 2020)

- *Electric rate design for commercial electric vehicle charging*

93. Prepared Direct Testimony on behalf of the **Solar Energy Industries Association** (A. 19-03-002 — March 17, 2020)

- *Electric rate design issues for solar and storage customers*

EXPERT WITNESS TESTIMONY BEFORE THE ARIZONA CORPORATION COMMISSION

1. Prepared Direct, Rebuttal, and Supplemental Testimony on behalf of **The Alliance for Solar Choice (TASC)**, (Docket No. E-00000J-14-0023, February 27, April 7, and June 22, 2016).

   - *Development of a benefit-cost methodology for distributed, net metered solar resources in Arizona.*

2. Prepared Surrebuttal and Responsive Testimony on behalf of the **Energy Freedom Coalition of America** (Docket No. E-01933A-15-0239 – March 10 and September 15, 2016).

   - *Critique of a utility-owned solar program; comments on a fixed rate credit to replace net energy metering.*

3. Direct Testimony on behalf of the **Solar Energy Industries Association** (Docket No. E-01345A-16-0036, February 3, 2017).

4. Direct and Surrebuttal Testimony on behalf of **The Alliance for Solar Choice and the Energy Freedom Coalition of America** (Docket Nos. E-01933A-15-0239 (TEP), E-01933A-15-0322 (TEP), and E-04204A-15-0142 (UNSE) – May 17 and September 29, 2017).

EXPERT WITNESS TESTIMONY BEFORE THE COLORADO PUBLIC UTILITIES COMMISSION

1. Direct Testimony and Exhibits on behalf of the **Colorado Solar Energy Industries Association** and the **Solar Alliance**, (Docket No. 09AL-299E – October 2, 2009). https://www.dora.state.co.us/pls/efi/DDMS_Public.Display_Document?p_section=PUC&p_source=EFI_PRIVATE&p_doc_id=3470190&p_doc_key=0CD8F7FCDB673F1043928849D9D8CAB1&p_handle_not_found=Y

   - *Electric rate design policies to encourage the use of distributed solar generation.*

2. Direct Testimony and Exhibits on behalf of the **Vote Solar Initiative** and the **Interstate Renewable Energy Council**, (Docket No. 11A-418E – September 21, 2011).

   - *Development of a community solar program for Xcel Energy.*

3. Answer Testimony and Exhibits, plus Opening Testimony on Settlement, on behalf of the **Solar Energy Industries Association**, (Docket No. 16AL-0048E [Phase II] – June 6 and September 2, 2016).

   - *Rate design issues related to residential customers and solar distributed generation in a Public Service of Colorado general rate case.*

EXPERT WITNESS TESTIMONY BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

1. Direct Testimony on behalf of **Georgia Interfaith Power & Light and Southface Energy Institute, Inc.** (Docket No. 40161 – May 3, 2016).

   - *Development of a cost-effectiveness methodology for solar resources in Georgia.*

EXPERT WITNESS TESTIMONY BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

1. Direct Testimony on behalf of the **Idaho Conservation League** (Case No. IPC-E-12-27—May 10, 2013)

   - *Costs and benefits of net energy metering in Idaho.*

2. a. Direct Testimony on behalf of the **Idaho Conservation League and the Sierra Club** (Case Nos. IPC-E-15-01/AVU-4-15-01/PAC-E-15-03 — April 23, 2015)
   b. Rebuttal Testimony on behalf of the **Idaho Conservation League and the Sierra Club** (Case Nos. IPC-E-15-01/AVU-4-15-01/PAC-E-15-03 — May 14, 2015)

   - *Issues concerning the term of PURPA contracts in Idaho.*

2. a. Direct Testimony on behalf of the **Sierra Club** (Case No. IPC-E-17-13 — December 22, 2017)
   b. Rebuttal Testimony on behalf of the **Sierra Club** (Case No. IPC-E-17-13 — January 26, 2018)

EXPERT WITNESS TESTIMONY BEFORE THE MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

1. Direct and Rebuttal Testimony on behalf of **Northeast Clean Energy Council, Inc.** (Docket D.P.U. 15-155, March 18 and April 28, 2016)

   - *Residential rate design and access fee proposals related to distributed generation in a National Grid general rate case.*

EXPERT WITNESS TESTIMONY BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

1. Prepared Direct Testimony on behalf of **Vote Solar** (Case No. U-18419—January 12, 2018)

2. Prepared Rebuttal Testimony on behalf of the **Environmental Law and Policy Center, the Ecology Center, the Solar energy Industries Association, Vote Solar, and the Union of Concerned Scientists** (Case No. U-18419 — February 2, 2018)

EXPERT WITNESS TESTIMONY BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

1. Direct and Rebuttal Testimony on Behalf of **Geronimo Energy, LLC**. (In the Matter of the Petition of Northern States Power Company to Initiate a Competitive Resource Acquisition Process [OAH Docket No. 8-2500-30760, MPUC Docket No. E002/CN-12-1240, September 27 and October 18, 2013])

    - *Testimony in support of a competitive bid from a distributed solar project in an all-source solicitation for generating capacity.*

EXPERT WITNESS TESTIMONY BEFORE THE MONTANA PUBLIC SERVICE COMMISSION

1. Pre-filed Direct and Supplemental Testimony on Behalf of **Vote Solar and the Montana Environmental Information Center** (Docket No. D2016.5.39, October 14 and November 9, 2016).

    - *Avoided cost pricing issues for solar QFs in Montana.*

EXPERT WITNESS TESTIMONY BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

1. Pre-filed Direct Testimony on Behalf of the **Nevada Geothermal Industry Council** (Docket No. 97-2001—May 28, 1997)

    - *Avoided cost pricing for the electric output of geothermal generation facilities in Nevada.*

2. Pre-filed Direct Testimony on Behalf of **Nevada Sun-Peak Limited Partnership** (Docket No. 97-6008—September 5, 1997)

    - *QF pricing issues in Nevada.*

3. Pre-filed Direct Testimony on Behalf of the **Nevada Geothermal Industry Council** (Docket No. 98-2002 — June 18, 1998)

    - *Market-based, avoided cost pricing for the electric output of geothermal generation facilities in Nevada.*

4. a. Prepared Direct Testimony on behalf of **The Alliance for Solar Choice (TASC)**, (Docket Nos. 15-07041 and 15-07042 –October 27, 2015).
   b. Prepared Direct Testimony on Grandfathering Issues on behalf of **TASC**, (Docket Nos. 15-07041 and 15-07042 –February 1, 2016).

c. Prepared Rebuttal Testimony on Grandfathering Issues on behalf of **TASC**, (Docket Nos. 15-07041 and 15-07042 –February 5, 2016).

- *Net energy metering and rate design issues in Nevada.*

EXPERT WITNESS TESTIMONY BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

1. Prepared Direct and Rebuttal Testimony on behalf of **The Alliance for Solar Choice (TASC)**, (Docket No. DE 16-576, October 24 and December 21, 2016).

- *Net energy metering and rate design issues in New Hampshire.*

EXPERT WITNESS TESTIMONY BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

1. Direct Testimony on Behalf of the **Interstate Renewable Energy Council** (Case No. 10-00086-UT—February 28, 2011)
http://164.64.85.108/infodocs/2011/3/PRS20156810DOC.PDF

- *Testimony on proposed standby rates for new distributed generation projects; cost-effectiveness of DG in New Mexico.*

2. Direct Testimony and Exhibits on behalf of the **New Mexico Independent Power Producers** (Case No. 11-00265-UT, October 3, 2011)

- *Cost cap for the Renewable Portfolio Standard program in New Mexico*

EXPERT WITNESS TESTIMONY BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

1. Direct, Response, and Rebuttal Testimony on Behalf of the North Carolina Sustainable Energy Association. (In the Matter of Biennial Determination of Avoided Cost Rates for Electric Utility Purchases from Qualifying Facilities – 2014; Docket E-100 Sub 140; April 25, May 30, and June 20, 2014)

- *Testimony on avoided cost issues related to solar and renewable qualifying facilities in North Carolina.*

April 25, 2014: http://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=89f3b50f-17cb-4218-87bd-c743e1238bc1
May 30, 2014: http://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=19e0b58d-a7f6-4d0d-9f4a-08260e561443
June 20, 2104: http://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=bd549755-d1b8-4c9b-b4a1-fc6e0bd2f9a2

2. Direct Testimony on Behalf of the North Carolina Sustainable Energy Association. (In the Matter of Biennial Determination of Avoided Cost Rates for Electric Utility Purchases from Qualifying Facilities – 2018; Docket E-100 Sub 158; June 21, 2019)

    - *Testimony on avoided cost issues related to solar and renewable qualifying facilities in North Carolina.*

EXPERT WITNESS TESTIMONY BEFORE THE PUBLIC UTILITIES COMMISSION OF OREGON

1. a. Direct Testimony of Behalf of **Weyerhaeuser Company** (UM 1129 — August 3, 2004)
   b. Surrebuttal Testimony of Behalf of **Weyerhaeuser Company** (UM 1129 — October 14, 2004)

2. a. Direct Testimony of Behalf of **Weyerhaeuser Company and the Industrial Customers of Northwest Utilities** (UM 1129 / Phase II — February 27, 2006)
   b. Rebuttal Testimony of Behalf of **Weyerhaeuser Company and the Industrial Customers of Northwest Utilities** (UM 1129 / Phase II — April 7, 2006)

    - *Policies to promote the development of cogeneration and other qualifying facilities in Oregon.*

3. Direct Testimony on Behalf of the **Oregon Solar Energy Industries Association** (UM 1910,01911, and 1912 — March 16, 2018).

    - *Resource value of solar resources in Oregon*

EXPERT WITNESS TESTIMONY BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

1. Direct Testimony and Exhibits on behalf of **The Alliance for Solar Choice** (Docket No. 2014-246-E – December 11, 2014)
   https://dms.psc.sc.gov/attachments/matter/B7BACF7A-155D-141F-236BC437749BEF85

    - *Methodology for evaluating the cost-effectiveness of net energy metering*

EXPERT WITNESS TESTIMONY BEFORE THE PUBLIC UTILITIES COMMISSION OF TEXAS

1. Direct Testimony on behalf of the **Solar Energy Industries Association** (SEIA) (Docket No. 44941 – December 11, 2015)

    - *Rate design issues concerning net metering and renewable distributed generation in an El Paso Electric general rate case.*

EXPERT WITNESS TESTIMONY BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

1. Direct Testimony on behalf of the **Sierra Club** (Docket No. 15-035-53—September 15, 2015)

    - *Issues concerning the term of PURPA contracts in Idaho.*

EXPERT WITNESS TESTIMONY BEFORE THE VERMONT PUBLIC SERVICE BOARD

1. Pre-filed Testimony of R. Thomas Beach and Patrick McGuire on Behalf of **Allco Renewable Energy Limited** (Docket No. 8010 — September 26, 2014)

    - *Avoided cost pricing issues in Vermont*

EXPERT WITNESS TESTIMONY BEFORE THE VIRGINIA CORPORATION COMMISSION

Direct Testimony and Exhibits on Behalf of the Maryland – District of Columbia – Virginia Solar Energy Industries Association, (Case No. PUE-2011-00088, October 11, 2011) http://www.scc.virginia.gov/docketsearch/DOCS/2gx%2501!.PDF

    - *Cost-effectiveness of, and standby rates for, net-metered solar customers.*

LITIGATION EXPERIENCE

Mr. Beach has been retained as an expert in a variety of civil litigation matters. His work has included the preparation of reports on the following topics:

- The calculation of damages in disputes over the pricing terms of natural gas sales contracts (2 separate cases).
- The valuation of a contract for the purchase of power produced from wind generators.
- The compliance of cogeneration facilities with the policies and regulations applicable to Qualifying Facilities (QFs) under PURPA in California.
- Audit reports on the obligations of buyers and sellers under direct access electric contracts in the California market (2 separate cases).
- The valuation of interstate pipeline capacity contracts (3 separate cases).

In several of these matters, Mr. Beach was deposed by opposing counsel. Mr. Beach has also testified at trial in the bankruptcy of a major U.S. energy company, and has been retained as a consultant in anti-trust litigation concerning the California natural gas market in the period prior to and during the 2000-2001 California energy crisis.

Florida Power & Light Company
Docket No. 20250011-EI
SACE's First Set of Interrogatories
Interrogatory No. 8
Page 1 of 1

QUESTION:
Please refer to the direct testimony of Tim Oliver at page 41, lines 13-22. Explain with specificity how FPL plans to use the funds described withing this portion of the testimony. In your answer, please provide the details on the "technology and software" to be purchased with the requested $5 million and the educational programs that the $1 million would support.

RESPONSE:
FPL is exploring emerging technologies and software upgrades to the FPL EVolution app to ensure system integrity and enhance the customer experience. Key initiatives include:

- Exploring emerging EV technologies (ex. EV Telematics for understanding capabilities of EV charging to analyze future control protocols, EV Mobile charging solutions, and multi-unit dwelling solutions).
- Expanding back-end capabilities, such as internal troubleshooting and charger self-healing, to improve uptime.
- Enhancing the customer-facing app for a better user experience, including features like plug-and-charge, streamlined first-time charger access, and vehicle integration.
- Advancing cybersecurity measures to remain at the forefront of technological developments, ensuring the protection of customer and company data.
- Improving EV infrastructure uptime and charge success rates through data analysis and proactive monitoring.
- Strengthening data analytics to better understand customer trends and failure modes, ultimately enhancing the customer experience.

FPL's educational initiatives, including the existing STEM-based Electrathon program, strive to continue and expand outreach to rural and underserved electric vehicle communities, increasing the program's impact across Florida. Investments in these programs include:

- Expanding electric go-kart kits donations, supporting an average of 15 high school teams annually.
- Organizing and executing the Speedway Series racing competitions held at notable motorsport venues across the state, with four competitions each year that give students the opportunity to showcase their creativity in a practical setting, while encouraging teamwork, problem-solving and critical thinking.
- Continuing to participate in customer-centric events with ride-and-drives and other connections to EV technology.
- Expand and enhance web resources like WattPlan that provide information about the cost of driving and powering an EV.

Florida Power & Light Company
Docket No. 20250011-EI
Staff's Fifth Set of Interrogatories
Interrogatory No. 100
Page 1 of 2

QUESTION:
Please refer to the direct testimony of Witness Oliver, page 40, lines 20 through 21. Please detail what expanding the tariff offering beyond fleet could include. As part of your response, provide the estimated annual participation increase and associated costs and revenues for the period 2026 through 2030.

RESPONSE:
See FPL's general objection regarding information for 2030. Notwithstanding this general objection, FPL provides the following response.

Referring to the direct testimony of FPL witness Oliver, page 40, lines 20 through 21, expanding the Commercial EV charging program ("program") beyond fleet would allow any commercial customer to enroll in the tariff. Examples include charging stations for multi-unit dwellings such as apartments or condominiums and destinations such as hospitals, universities, airports, parks, and retail establishments.

The estimated annual participation in this program is defined as new EV charging handles (aka ports) that are forecasted to be enrolled. Please refer to the chart below for the estimated annual participation in this program for the period 2026 through 2029.

Estimated Annual Port Counts:

	2026	2027	2028	2029
Commercial EV Total (Incremental)	180	180	200	265

Costs and revenues are defined in tariff sheet No. 8.942 Commercial Electric Vehicle Charging Services Rider (rate schedule CEVCS-1) as the Monthly Service Payment. Costs for the program are contained within the customers enrolled over the term of the agreement.

Refer to the table below the forecasted costs and revenues associated with this program for the period of 2026 through 2029. Note during the preparation of this response, the Company determined it had inadvertently excluded revenues associated with this program in the 2026 and 2027 Projected Test Years. The Company will include revenues associated with this item when it files its Notice of Identified Adjustments at a later time in this proceeding.

	2026	2027	2028	2029
Revenues	$432,000	$1,080,000	$1,764,000	$2,601,000
O&M Expenses	$103,439	$107,316	$110,431	$114,050
Capital Expenditures	$4,590,000	$4,825,000	$5,450,000	$7,600,000

Florida Power & Light Company
Docket No. 20250011-EI
Staff's Fifth Set of Interrogatories
Interrogatory No. 100
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In addition, please refer to the chart below for the 13-month average balances associated with Construction Work in Progress, Plant in Service, and Accumulated Depreciation Reserve, as well as the annual operating expenses included in the 2026 and 2027 Projected Test Years associated with this pilot program that FPL can readily identify:

FERC Account	FERC Account Description	2026 Projected Test Year	2027 Projected Test Year
107	CWIP	$1,555,164	$1,683,138
101	Plant in Service	$5,073,636	$9,653,162
108	Accumulated Depreciation Reserve	$226,621	$716,211
403	Depreciation Expense	$338,519	$644,099
922	A&G Salaries	$88,322	$91,409
923	Outside Services	$2,400	$2,400
925	Injuries & Damages	$170	$181
926	Employee Pensions & Benefits	$6,011	$6,707
408.1	Taxes Other than Income Taxes, Payroll Tax	$6,536	$6,619

Florida Power & Light Company
Docket No. 20250011-EI
EVGO's First Set of Interrogatories
Interrogatory No. 1
Page 1 of 1

QUESTION:
At page 21 of Ms. Cohen's testimony, she states: "Based on the success and experience of certain pilot programs, FPL is proposing to make the following programs permanent tariffs:", before listing six programs, including CEVCS-1, GSD-1EV and GSLD-1EV.

a. How does FPL define "success" for each of the CEVCS-1, GSD- 1EV and GSLD-1EV pilot programs?

b. Please provide any metrics the Company developed or reviewed to reach the conclusion that CEVCS-1, GSD-1EV and GSLD-1EV have experienced "success", as well as the supporting data or workpapers used to develop those metrics.

RESPONSE:
Success for CEVCS-1 is indicated by the interest and enrollment of commercial customers, the operational feasibility of the installed charging equipment, and positive feedback from the participants.

Success for the GSD-1EV and GSLD-1EV (General Service Demand and General Service Large Demand EV Charging Tariffs) tariffs is indicated by:

- The transition of customers from pilot rates to standard rates upon achieving higher load factors and consistent utilization.
- The financial sustainability of charging stations receiving the demand limiter benefits.
- The overall growth in EV charging infrastructure and usage within FPL's service area, indicated by the increase in the number of fast charging stations and the total energy dispensed through these stations.

FPL has developed and reviewed specific metrics to assess the success of CEVCS-1, GSD-1EV, and GSLD-1EV pilot programs. These metrics include:

Enrollment and Participation:

- 42 active customer accounts under GSD-1EV and GSLD-1EV as of December 31, 2024.
- One customer enrolled in CEVCS-1 by 2024, with installation in 2025.

Utilization and Transition to Standard Rates:

- 34 customers transitioned from pilot to standard rates as of December 31, 2024.
- Increased load factors for charging stations moved to standard rates.

Refer to FPL's response to EVGO's First Set of Interrogatories, No. 6 for additional information on GSD-1EV and GSLD-1EV pilot programs.

Florida Power & Light Company
Docket No. 20250011-EI
EVGO's First Set of Interrogatories
Interrogatory No. 6
Page 1 of 1

QUESTION:
At page 37, Mr. Oliver states: "The company is also seeking approval to make permanent the GSD-1EV and GSLD-1EV demand limiter optional pilot tariffs as permanent tariffs."

a. Did the Company consider modifying its pilot tariffs? If so, please explain the options the Company considered for modifying its tariffs, and why the Company did not choose those options.

b. Please provide the number of total charging stations enrolled in each of GSD-1EV and GSLD-1EV, by year, since pilot inception

RESPONSE:
a. The Company did not consider modifying the GSD-1EV or GSLD-1EV pilot tariffs. The existing tariffs have proven effective in achieving the objectives of promoting EV adoption and supporting infrastructure investment. Initial feedback and the observed transition of 34 out of 76 customers (45%), since year-end 2024, from the pilot tariffs to regular rates demonstrate the success of the current structure. This number may change over time as more customers transition out of this rate. Therefore, the Company determined that retaining the existing tariffs without modifications was the best approach to continue supporting the growth of EV infrastructure and adoption.

b. Since 2020, 76 locations have enrolled in the demand limiter rate, with 60 on the GSD-1EV and 16 on GSLD-1EV. As of March 2025, there are 40 locations currently enrolled in the program.

See Table 1 below for the number of locations/accounts enrolled in each of GSD-1EV and GSLD-1EV, by year, since pilot inception:

Table 1:

End of Year	GSD-1EV	GSLD-1EV	Total
2021	45	1	46
2022	50	4	51
2023	50	10	60
2024	35	7	42
March 2025	33	7	40

Florida Power & Light Company
Docket No. 20250011-EI
EVGO's First Set of Interrogatories
Interrogatory No. 8
Page 1 of 2

QUESTION:
At page 40 of Mr. Oliver's testimony, he states: "The [Commercial EV Charging Services Pilot] involves the installation of FPL-owned, operated, and maintained EV supply equipment on customer premises. This commercial EV charging tariff structure ("CEVCS-1") ensures that customers pay a fixed monthly charge, calculated to recover all costs and expenses over the asset's lifespan and carries no cost impact to FPL's general body of customers over the term of the service agreement [...] The Company is seeking approval to make this rate permanent and expand the tariff offering beyond the "fleet," broadening access for commercial users."

a. How many customers are enrolled in this pilot?

b. What type(s) of non-fleet customers would have access to this offering if it is made permanent?

c. What retail rate(s) for electric service would be paid by customers participating in this program if it is made permanent?

d. What is the proposed budget for this offering?

e. Please provide FPL's forecasts for participation in this pilot over the next five years, by year.

f. How does this program differ from the Company's existing EVolution program?

g. How does this program fulfill a need not filled by the private market?

RESPONSE:
See FPL's general objection regarding information for 2030. Notwithstanding this general objection, FPL responds as follows:

a. There is currently one customer enrolled under the pilot CEVCS-1 rate.

b. Refer to FPL's response to Staff's Fifth Set of Interrogatories, No. 100. The Commercial EV charging program ("Program") beyond fleet would allow any commercial customer to enroll in the tariff. Examples include charging stations for multi-unit dwellings, such as apartments or condominiums and destinations such as hospitals, universities, airports, parks, and retail establishments.

c. These customers would enroll in standard service commercial rates, such as general service demand and general service large demand, and depending on use case, the customer may also qualify for EV demand limiter rates or commercial time-of-use rates.

d.-e. Refer to FPL's response to Staff's Fifth Set of Interrogatories, No. 100.

f. FPL is proposing to open the Program to non-fleet customers. Refer to subpart b above.

g. FPL's Commercial Electric Vehicle Charging Services (CEVCS) program offers a solution and another option for customers, similar to other third-party EV charging solutions. Like those programs, our CEVCS program provides a turnkey approach for commercial customers looking to provide electric vehicle charging services. This includes the installation of FPL-owned, operated, and maintained EV supply equipment on customer premises. The program ensures that customers pay a fixed monthly rate, designed to recover all costs over the lifespan of the assets, with no cost impact to FPL's general body of customers. Additionally, the program is equipment agnostic, enabling it to integrate seamlessly with various types of charging infrastructure, offering flexibility, and providing convenience for an on-bill solution.

Florida Power & Light Company
Docket No. 20250011-EI
EVGO's First Set of Interrogatories
Interrogatory No. 12
Page 1 of 1

QUESTION:
Assuming the Company's proposals in this proceeding are approved, please estimate the number of FPL-owned public fast charging ports the Company will have installed by the end of 2025, 2027 and 2030.

RESPONSE:
By the end of 2025, FPL expects to have installed a total of 585 public fast charging ports. This includes the 321 installed by the end of 2024 and additional ports planned for installation in 2025. This is the maximum number of ports planned at this time, so port count by the end of 2027 and 2030 will also be 585.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished by electronic mail this 9th day of June 2025 to the following:

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