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 Noah Garcia on behalf of EVgo Services, LLC and Exhibit NG-1. 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

NOAH GARCIA

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 Noah Garcia. I am a Senior Manager of Market Development and Public Policy at EVgo Services, LLC (EVgo). My business address is 1661 East Franklin Ave, El Segundo, CA 90245.

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

A. Yes. My experience and qualifications are described in the attached *curriculum vitae* (CV), which is included as Exhibit NG-1 to this testimony. As demonstrated in my CV, I have nearly a decade of experience in transportation electrification (TE) and related utility regulation. I began my career in 2015 at the Natural Resources Defense Council (NRDC), where I engaged in state public utilities commission rulemakings and proceedings on utility TE policies and programs in 10 states. After leaving NRDC, I joined the consulting firm ICF as a Senior Transportation Analyst where I provided policy and technical analysis on various clean vehicles and fuels projects for government, utility, and industry clients. After leaving ICF, I joined Advanced Energy United (formerly Advanced Energy Economy) as a Policy Principal where I managed the clean energy association's engagement in regulatory proceedings before various public utilities commissions on a range of issues, including transportation electrification and distributed energy resources. Since leaving Advanced Energy United, I have been employed at EVgo as a Senior Manager on the Market Development and Public Policy team where I have overseen EVgo's government and regulatory affairs portfolio on the West Coast.

Q. Have you previously testified before this Commission?

A. No, I have not. However, I have testified before commissions in California, Massachusetts, Missouri, and Pennsylvania.

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

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

Company's EV charging programs will achieve their desired policy objectives and benefit the Company's ratepayers. The Company's portfolio of EV charging programs should represent a prudent investment of ratepayer money and should complement and encourage, rather than hinder, strategically deployed private investment in EV charging infrastructure in the Company's service territory. Specifically, my testimony demonstrates the need for the Company to implement a make-ready program to maximize benefits for its ratepayers and achieve the Commission's policy objectives for all Floridians. My testimony also recommends the make-ready program be implemented in lieu of the Company's proposed expansion of the Commercial EV Charging Services (CEVCS) pilot.

Q. Are other EVgo witnesses providing testimony in this proceeding?

A. Yes. R. Thomas Beach, principal consultant of the consulting firm Crossborder Energy, will present EVgo's recommendations related to Florida Power and Light's (FPL or "the Company") EV public charging pilot tariffs, including the General Service Demand (GSD-1EV) and General Service Large Demand (GSLD-1EV) tariffs, and the Utility-Owned Public Charging (UEV Tariff) tariff.

Q. What is EVgo's interest in this proceeding?

A. The outcome of this proceeding will directly affect EVgo. EVgo is an active participant in the competitive market for DCFC in Florida, currently owning and operating more than 100 fast-charging stalls with plans for expansion. EVgo is also an electric commercial retail customer of FPL, taking service under the Company's General Service Demand rates. EVgo also participates in FPL's existing Electric Vehicle Charging Infrastructure Rider pilot, and may continue to participate or seek to participate in that

program (to the extent it remains available) and other FPL electric vehicle charging-related rates and programs (collectively, "EV charging programs").

In this proceeding, the Company proposes to make several of its EV charging programs permanent. The success of the Company's EV charging proposals will impact the rates and overall bills paid by the Company's ratepayers (which include EVgo) in the future. In general, increased electrification leads to higher electricity consumption, which distributes system costs across a larger energy use base, thereby exerting downward pressure on rates for all customers.

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

A. EVgo recommends the Commission:

- Direct the Company to implement a make-ready program with an annual budget of at least $5 million, that provides incentives of at least $50,000 per stall for DCFC at publicly-accessible locations. In doing so, the Commission would continue the strong trend towards make-ready programs which have been adopted by utilities in 20 other states, including Duke Energy in Florida. These programs effectively drive deployment of EV charging infrastructure in FPL's service area for the benefit of all of the utility's customers regardless of whether they drive or ride EVs.
- Not adopt the Company's proposal to expand the scope of the CEVCS pilot to all commercial customers, which is not sufficiently justified. Implementing a make-ready program as suggested above would more effectively encourage private sector investment in EV charging.

- Not adopt the Company's proposal to make the CEVCS tariff permanent, given FPL's limited success and experience with the pilot tariff, plus the lack of a detailed justification in the record of this case for the authorizations that it requests.

Q. Do you sponsor any exhibits to your testimony?

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

- Exhibit NG-1 – CV of Noah Garcia

II. BACKGROUND

Q. What are the public interest benefits of increased TE?

A. TE can generate benefits for multiple stakeholders:

1. EV drivers can benefit from reduced vehicle operating costs for EVs as compared to traditional vehicles.[1]
2. Electric utilities can benefit from increased load due to EV charging, increased grid reliability, and improved electrical system efficiency, as EV drivers tend to charge during off-peak hours.[2]
3. All electric utility ratepayers can realize benefits of transportation electrification: by charging during periods when the electric grid is underutilized, EVs and associated infrastructure can place downward pressure on utilities' electricity

[1] *Electric Vehicle Cost-Benefit Analysis - Plug-in Electric Vehicle Cost-Benefit Analysis: Florida* (January 2019), M.J. Bradley & Associates, https://www.erm.com/globalassets/documents/mjba-archive/reports/2019/flpevcbanalysis07jan19.pdf at 10-11.

[2] 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 5.

rates by spreading fixed system costs over a greater number of kilowatt-hours sold.[3] [4]

Finally, the state as a whole can benefit from economic development, job creation, improved air quality and associated health benefits.[5] These benefits are widely recognized by utility commissions and utilities across the country.[6]

Q. Have the benefits of TE been quantified for the state of Florida?

A. Yes. In 2019, Duke Energy worked with M.J. Bradley & Associates (MJB&A) to conduct six state-level analyses "intended to provide input to state policy discussions about actions required to promote further adoption of electric vehicles, as well as to inform internal Duke planning efforts."[7] The study found that, if Florida personal EV[8] adoption follows the moderate trajectory then assumed by the Energy Information Administration, the net present value of cumulative net benefits from greater EV use in the state will exceed $11.7 billion state-wide by 2050.[9] If EV sales in Florida are high enough to get the state onto a more aggressive trajectory (for example through supportive

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[3] Eric Cutter, et al. *Distribution Grid Cost Impacts Driven by Transportation Electrification.* Energy+Environmental Economics (June 2021), https://www.ethree.com/wp-content/uploads/2021/06/GridLab_2035-Transportation-Dist-Cost.pdf.

[4] *Electric Vehicle Cost-Benefit Analysis - Plug-in Electric Vehicle Cost-Benefit Analysis: Florida* (January 2019), M.J. Bradley & Associates, https://www.erm.com/globalassets/documents/mjba-archive/reports/2019/flpevcbanalysis07jan19.pdf at 7-10.

[5] *Id* at 10-15.

[6] *See, e.g.*, Georgia Public Service Commission Docket No. 42516, *Order Adopting Settlement Agreement*, https://services.psc.ga.gov/api/v1/External/Public/Get/Document/DownloadFile/179856/62307 at 18; and Charles Harper, Gregory McAndrews, and Danielle Saas Byrnett, *Electric Vehicles: Key Trends, Issues, and Considerations for State Regulators* (October 2019), NARUC, https://pubs.naruc.org/pub/32857459-0005-B8C5-95C6-1920829CABFE; and Delaney Dixon et al., *Mini Guide on Transportation Electrification: State-Level Roles and Collaboration among Public Utility Commissions, State Energy Offices, and Departments of Transportation* (Summer 2022), National Council on Electricity Policy, https://pubs.naruc.org/pub/131FFF33-1866-DAAC-99FB-D86EE13B1709.

[7] *Electric Vehicle Cost-Benefit Analysis - Plug-in Electric Vehicle Cost-Benefit Analysis: Florida* (January 2019), M.J. Bradley & Associates, https://www.erm.com/globalassets/documents/mjba-archive/reports/2019/flpevcbanalysis07jan19.pdf at 19.

[8] Referred to in the M.J. Bradley report as "plug-in electric vehicles" or PEVs.

[9] *Id.* at ii.

policies and programs), the net present value of cumulative net benefits from greater EV use in Florida could exceed $106.2 billion statewide by 2050.[10] This Florida study estimated the costs and benefits of increased adoption of EVs in the state, including:

- the financial benefits that would accrue to all electric utility customers in Florida due to greater utilization of the electric grid during low load hours, and resulting increased utility revenues from EV charging;
- the annual financial benefits to Florida drivers from owning EVs—from fuel and maintenance cost savings compared to owning gasoline vehicles; and
- reductions in gasoline consumption, and associated greenhouse gas (GHG) and nitrogen oxide (NOx) emission from greater use of EVs instead of gasoline vehicles.

Q. Are you aware of any study that specifically quantifies the impact of EV adoption on utility customers?

A. Yes. A 2024 study by Synapse Energy Economics found that, since 2011, EVs have contributed significantly more in utility revenues than costs. Because of this, EVs have helped apply downward pressure on rates across the country.[11] In Florida, in particular, Synapse found that the utility revenues from EV adoption exceeded costs by $55.6 million between 2011 and 2021,[12] demonstrating that TE provides net benefits to utility ratepayers.

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[10] *Id.* at iii.

[11] 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.

[12] 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.

Q. How does increased TE provide economic benefits to the state and local jurisdictions?

A. Policies and programs that support TE will also drive private investment to the state and thereby lead to economic development and job creation. As of June 2024, over $78 billion has been invested in TE manufacturing with over 73,900 anticipated TE manufacturing jobs in the Southeast.[13] While Florida currently lacks a major passenger vehicle production facility, increased TE will bring Florida economic benefits from jobs in the development, construction, and maintenance of TE facilities and assets. Additionally, policies to increase TE can attract manufacturing plants and other jobs to the state as it has for other states in the region.[14] Finally, increased TE drives economic growth for local businesses, as public EV charging stations tend to attract higher-income, exploratory visitors, and local residents. One study found that a single EV charging station increased spending by 3.2% for businesses within 100 meters between January 2021 and June 2023.[15] These findings underscore the value of expanding TE as a tool for local economic development.

Q. What public interest benefits of TE have been recognized by the state of Florida?

A. In 2021, Florida Department of Transportation (FDOT) released its Electric Vehicle Infrastructure Master Plan (EVMP). This plan explains that TE provides opportunities to transform mobility by providing cost-effective travel options while promoting energy

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[13] Matthew Vining and Moe Khatib, *Transportation Electrification in the Southeast* (Atlas Public Policy, October 2024), https://www.cleanenergy.org/wp-content/uploads/Transportation-Electrification-in-the-Southeast-2024.pdf

[14] Conner Smith and Kim Latham, *Transportation Electrification in Florida: A Deep Dive Into Travel Patterns & Statistics Across the EV Sector* (Atlas Public Policy, October 2020), https://cleanenergy.org/wp-content/uploads/Transportation-Electrification-in-Florida.pdf at 9-10.

[15] Zheng, Y., Keith, D.R., Wang, S. *et al.* Effects of electric vehicle charging stations on the economic vitality of local businesses. *Nat Commun* 15, 7437 (2024), https://doi.org/10.1038/s41467-024-51554-9, https://www.nature.com/articles/s41467-024-51554-9.

independence.[16] It notes that electric mobility provides several benefits to both transportation and energy sectors including, but not limited to, lower cost of vehicle ownership for households due to lower fuel and maintenance costs; increased energy diversity and independence; zero tailpipe emissions leading to improved air quality, reduction in noise pollution, and improved vehicle efficiency.[17]

Q. What is DCFC infrastructure?

A. DCFC charges a vehicle's battery using direct current at high power, which allows for fast charging in minutes instead of hours. DCFC is well-suited for quick charge needs in and around cities, towns, and suburbs and along high-traffic travel corridors. DCFC stations are generally located at or near places where drivers live, drive, and shop, including retail locations, restaurants, grocery stores, and other locations where an EV driver will be for 15-45 minutes. By contrast, Level 2 charging typically provides a full charge in 4 to 8 hours and is often sought in longer duration, long dwell-time locations such as at workplaces, homes, amusement parks, or other destinations where drivers may spend several hours.

Q. How does public DCFC drive greater TE?

A. EVgo has found that public DCFC helps drive EV adoption—and therefore increases charging and electric load—by serving a variety of drivers' needs. DCFC builds the range confidence of EV drivers, especially on trips between cities or across the country. As the FDOT notes in its EVMP released in 2021, range anxiety during longer trips is still a

[16] https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/emergingtechnologies/evprogram/fdotevmp.pdf?sfvrsn=b5888a_2 at 4.
[17] *Id.* at 5.

perceived barrier to EV adoption.[18] Public DCFC plays an equally important role in dense, urban, and suburban areas where not every home has a driveway, attached garage, or—in many cases—any dedicated parking. According to the International Council on Clean Transportation, apartment-dwelling EV drivers living in multifamily housing rely on public charging for 50-80% of their charging,[19] as they typically do not have access to dedicated parking or home charging. Similarly, research from UCLA's Luskin Center shows that 43% of multifamily housing residents rely on DCFC stations for their primary means of charging.[20] Thus, siting DCFC in community locations near multifamily housing and existing amenities drives EV adoption by providing charging options to drivers that do not own a single-family home.

Q. Please provide background on the role of utilities in supporting TE.

A. Utilities can play a significant role in advancing TE in addition to their traditional role of ensuring there is sufficient capacity on the grid. However, it is crucial to ensure that utility programs are complementary to private market activities in order to enable a robust competitive market for EV charging that will attract private capital investment, lead to increased EV adoption, and put a downward pressure on utility customer rates over the long term. Aiming to achieve this balance, utilities and Commissions nationwide are moving toward a framework wherein utilities support the competitive market through make-ready infrastructure investments and/or rebate programs.

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[18] *See* https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/emergingtechnologies/evprogram/fdotevmp.pdf?sfvrsn=b5888a_2 at 7.

[19] International Council on Clean Transportation, *Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets* (January 2019), https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf at 9.

[20] DeShazo and Di Filippo, "Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers. UCLA Luskin Center for Innovation," (February 2021), https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf at 3, 13.

Another way utilities support TE is through rate design. As is discussed by EVgo witness R. Thomas Beach, public DCFC infrastructure has a unique load profile that makes it distinct from other commercial customers. The availability of commercial EV rates that account for the unique loads of fast charging stations incentivizes private investment within the state and thus is also essential to achieve TE at scale.

III. MAKE-READY INFRASTRUCTURE PROGRAM

Q. What is the purpose of this section of your testimony?

A. In this section of my testimony, I recommend the Commission direct the Company to implement a new type of program—a make-ready program—in order to most efficiently use the Company's resources to advance TE while maximizing benefits for the Company's ratepayers.

Q. What is a make-ready program?

A. "Make-ready" infrastructure refers to the electrical equipment necessary to operate a charging station. This can include sub-panels, main-panels, conductors, wiring, transformers, and other equipment on both the customer- and utility-side of the meter. Utility make-ready programs support the development of EV charging stations by reducing the upfront cost of the utility-related construction required to install EV charging infrastructure, which EV charging providers must cover. Through make-ready programs, utilities might, for instance, invest in rate-based distribution upgrades and branch line extensions, while leaving investments in chargers, charger ownership, operation and maintenance, marketing, customer service, and network operation to private sector providers. Make-ready programs have been implemented across the nation in over 20 states and, when well-designed and funded at levels that align with the

installed costs of DCFC, have efficiently spurred private investment in chargers and driving ratepayer benefits.

Q. Can you provide examples of other utilities that have implemented make-ready programs?

A. Yes. As I noted above, state public utilities commissions in over 20 states have approved make-ready programs and in recent years, $1.78 billion have been authorized for make-ready programs, as opposed to $129.3 million for utility-owned programs. In fact, in April 2024, Duke Energy[21] put forward a make-ready program in Florida, which was subsequently approved by the Commission in November 2024. Duke's make-ready program includes a forecasted budget of $3.28 million for public DCFCs over 50 kW.

Additionally, Georgia Power's Make-Ready Infrastructure Program[22] provides up to $300,000 per project for public-facing sites and has a budget of approximately $53 million between 2023 and 2025. In their filing, Georgia Power cited "increasing customer interest and market demand," as well as "[the Company's] efforts to invest in the infrastructure and technology needed to support the growth of electric transportation in Georgia.[23] On May 19, 2025, Georgia Power and the Public Interest Advocacy Staff filed a petition to extend the current Alternative Rate Plan, which would extend the program and provide another $53 million between 2026 and 2028.[24]

Two other examples of make-ready programs include Tucson Electric Power and Xcel Energy in Colorado:

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[21] https://www.duke-energy.com/business/products/ev-complete/charger-prep-credit.

[22] https://www.georgiapower.com/business/products-programs/business-solutions/electric-transportation-business-programs/make-ready.html.

[23] Georgia Public Service Commission, Docket No. 44280, *Direct Testimony of Christopher C. Womack, On Behalf of Georgia Power Company* at 10.

[24] Georgia Public Service Commission, Docket No. 44280, *Joint Petition of Georgia Power Company and the Public Interest Advocacy Staff for Approval of the Stipulation to Extend the Alternate Rate Plan.*

- Tucson Electric Power's make-ready program offers utility investment of up to $40,000 per DCFC connector, covering up to 75% of project costs.[25] The utility has allocated $16.4 million for commercial rebates.
- Xcel Energy in Colorado's EV Supply Infrastructure Program[26] provided make-ready infrastructure for 186 privately developed public DCFC with a total budget of $9.63 million between 2021 and 2023. Xcel Energy's most recent programs, which will be available from 2024 through 2026 have a budget of $120 million and will offer a $45,000-$90,000 make-ready rebate per DCFC connector. The current program also offers a charger rebate of up to $40,000 per connector (depending on power level) for certain DCFC locations.

Other utilities that provide make-ready programs include Alabama Power,[27] Commonwealth Edison in Illinois,[28] and National Grid and Eversource in Massachusetts.[29]

Q. Please describe Duke Energy's Make-Ready Program.

A. As I noted above, utilities in Florida are already opting to move toward the make-ready model, i.e., Duke Energy. In Docket No. 20240025-EI, the Commission approved Duke

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[25] https://www.tep.com/smart-ev-charging-program/.

[26] https://co.my.xcelenergy.com/s/business/ev.

[27] https://www.alabamapower.com/business/business-customers-and-services/electric-transportation-business-programs/make-ready-program.html; The program provides DCFC rebates up to $20,000 per port for make-ready infrastructure.

[28] https://www.comed.com/about-us/clean-energy/make-ready-rebate-program; The program provides make-ready rebates with limits of $667-$1,000 per kW for DCFCs between 2023 and 2025 with a total budget of $30 million. And for 2026 to 2028, it will provide make-ready rebates with limits of $450-$675 per kW, with a total budget of $47 million.

[29] *See, e.g.*, https://www.nationalgridus.com/media/pdfs/bus-ways-to-save/ev/cm8214b-ev-public_workplace_incentive_charts.pdf; National Grid and Eversource Massachusetts's Public and Workplace Charging Program provides a customer-side make-ready incentive between $30,000 and $60,000 per port based on power level and a utility-side make-ready incentive for DCFCs. The programs also offer a charger rebate for DCFCs up to $40,000 and $80,000 per port based on power level and location. Between 2023 and 2026, National Grid's program has a public and workplace DCFC budget of approximately $94.7 million, and Eversource's program has a public and workplace DCFC budget of $109.1 million.

Energy's Make-Ready Credit Program (MRC Program), which will be available from 2025 through 2027. Duke Energy proposed the program "[to support] the adoption of EVs"[30] and "[simplify] EV adoption"[31] by providing an incentive, in the form of a credit on a customer's bill or a payment to a contractor, to defray a portion of the EV "make ready" expenses related to the installation of the infrastructure needed to bring safe electrical service to EV charging hardware. This program is available to nonresidential Duke Energy customers that install at their premises the wiring and circuitry required for a Level 2 or higher-powered EV supply equipment. For DCFC, the incentive levels per charger range between $8,831 and $230,184 based on the type of chargers, nameplate power output, and projected usage based on site characteristics. In its application, Duke described the program's benefit of creating a downward pressure on rates for the benefit of all customers,[32] as well as supporting safety, grid management,[33] and the competitive EV charging market.[34]

Q. What did the Commission state with regard to Duke Energy's MRC Program?

A. The Commission's Order approving Duke Energy's MRC Program stated, "[t]he record demonstrates that [the residential EV Off-Peak Charging Load Management Program and the MRC program] offer benefits to the system as a whole, and are expected to result in lower rates overall, delay potential future investments in infrastructure, and offer immediate benefits to participants. Participation in these programs is voluntary, and any

30 Docket 20240025-EI, *Direct Testimony of Marcia Olivier* at 19.
31 Docket 20240025-EI, *Direct Testimony of Tim Duff* at 17.
32 *Id* at 20-21.
33 *Id* at 21.
34 *Id* at 22.

costs on the system resulting from the program are expected to be exceeded by additional revenues from EV charging."[35]

Q. Are you aware that the Company's rates include EV Charging Infrastructure Riders?

A. Yes.

Q. And are you aware that those riders provide a benefit to DCFC customers?

A. Yes, I am aware those riders are intended to help alleviate the "demand charge barrier" that charging customers can face at low load factors. I commend FPL for their early leadership in establishing those riders in an attempt to support further deployment by recognizing the unique load of DCFCs.

Q. Why is a make-ready credit necessary in addition to the benefit available to DCFC customers through the EV charging infrastructure riders?

A. Make-ready programs are complementary to demand charge alternative rates. Demand charge alternative rates address the unique load profile of public DCFC infrastructure, which creates a disproportionately high effective dollar per kilowatt-hour cost (due to demand charges) and makes up the largest portion of an EV charging site's ongoing *operating* costs. On the other hand, make-ready programs defray a portion of the high *initial* capital costs for deploying chargers—the costs to install the infrastructure needed to bring safe electrical service to EV charging hardware. While both make-ready programs and effective commercial rate design are critical to enabling transportation electrification, they address different barriers and, in tandem, can build on FPL's efforts

[35] Docket No. 20240025-EI, *Final Order Approving 2024 Settlement Agreement*, Order No. PSC-2024-0472-AS-EI (November 12, 2024), https://www.floridapsc.com/pscfiles/library/filings/2024/09858-2024/09858-2024.pdf at 19.

to encourage TE to date and make the Company's service territory attractive for the increased private investment that drives the benefits of broader TE adoption.

Q. Do make-ready programs create a risk of stranded assets?

A. While make-ready programs defray a portion of the high initial costs to deploy chargers, third-party EV charging providers are still making a significant financial investment. As a result, EV charging providers remain incentivized to actively ensure successful installation and operation of the chargers. For example, EVgo intends to operate its hardware for 7-10 years, with the potential for customer-side upgrades or equipment replacement following that time frame. Thus, there is limited risk in this scenario that the make-ready infrastructure would become a stranded asset.

Q. What does EVgo recommend with regard to a make-ready program?

A. EVgo recommends the Commission direct the Company to implement a make-ready program, similar to Duke Energy's program, with an annual budget of at least $5 million, that provides incentives of at least $50,000 per stall for DCFC at publicly-accessible locations.

Q. Why does EVgo propose these incentive levels?

A. This level of investment reflects a consideration of the costs of public DCFC and what will meaningfully drive program participation, improving the program's efficiency and maximizing the benefits to ratepayers.

EVgo has a long history of competing in the open market in Florida, and looks forward to continuing to compete in the open market against other public EV charging providers (all of whom will have the ability to pursue the same opportunities that the proposed make-ready program makes available). But all of these companies in the

business of deploying public DCFC in FPL's service territory will face the same general categories and magnitudes of expected costs. In a 2023 study, the National Renewable Energy Laboratory assessed the costs of charging infrastructure to estimate the cumulative capital investment required to deploy a charging network that would accommodate the EVs on the road in 2030. For DCFC, the study estimated the hardware cost for a 150 kW charger ranged from $66,400 to $102,200 per port,[36] while the hardware cost for a 350+ kW charger ranged from $116,400 to $167,400 per port.[37] Additionally, the study estimated the installation costs for a 150 kW charger ranged from $45,800 to $94,000 per port, while the installation costs for a 350+ kW charger ranged from $63,700 to $117,900 per port.[38] Consequently, the cost to procure and deploy each charging port could cost between $112,200 and $285,300.

Table 1.

	150 kW charger	**350+ kW charger**
Hardware Cost	Between $66,400 and $102,200 per port	Between $116,400 and $167,400 per port
Installation Costs	Between $45,800 and $94,000 per port	Between $63,700 and $117,900 per port
Total Costs	Between $112,200 and $196,200 per port	Between $180,100 and $285,300 per port

As noted above, over $1.78 billion in funding for utility make-ready programs have been approved across the country, including by Duke Energy in Florida. The $50,000 per stall cap incentive that I recommend be offered by the make-ready program

[36] In this case "port" refers to a unit that provides power to charge only one vehicle at a time and therefore is equivalent to my defined term "stall."

[37] Eric Wood et al., rep., *The 2030 National Charging Network: Estimating U.S. Light-Duty Demand for Electric Vehicle Charging Infrastructure* (National Renewable Energy Laboratory, June 2023), https://www.nrel.gov/docs/fy23osti/85654.pdf at 33.

[38] *Id.*

is in line with the incentive levels offered by Duke Energy Florida's MRC Program, which can range from approximately $39,000-$67,000 per stall for high-powered public DCFCs, as determined by a complex custom calculation.[39] In this case, I recommend a fixed incentive per stall—a common approach which will simplify the program for participants and streamline implementation for the utility.

Q. Why is it important for the Company to offer a make-ready program similar to Duke Energy's program?

A. The Commission should seek to enable ratepayers across utility territories to access similar benefits wherever possible. As the Commission stated, the Duke MRC program is expected to result in lower rates overall for Duke ratepayers.[40] FPL ratepayers should also be afforded these benefits. Further, the availability of programs that support charger deployment across the state are critical to serve drivers' needs. The Company serves over 12 million customers, or over half of the state's population.[41]

Q. Why should the Company initiate a make-ready program instead of relying on deployment of utility-owned chargers?

A. We commend FPL for their early leadership in transportation electrification. Since FPL's initiation of the Evolution program 6 years ago, utilities across over 20 states have primarily moved to the make-ready model to accelerate deployment of charging in their service territories, including Duke Energy with the Commission's recent approval of the

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[39] *See* https://www.duke-energy.com/business/products/ev-complete/charger-prep-credit for public DC fast charger, 341-380 nameplate kW, low to medium volume site or high volume site. The calculation shows credit per charger, which we assume provides two stalls each.

[40] Docket No. 20240025-EI, *Final Order Approving 2024 Settlement Agreement*, Order No. PSC-2024-0472-AS-EI (November 12, 2024), https://www.floridapsc.com/pscfiles/library/filings/2024/09858-2024/09858-2024.pdf at 19.

[41] Docket No. 20250011-EI, *Test Year Notification Pursuant to Rule 25-6.140, Florida Administrative Code*, Document No. 00012-2025 (January 2, 2025), https://www.floridapsc.com/pscfiles/library/filings/2025/00012-2025/00012-2025.pdf at 1.

MRC Program. Through make-ready programs, utilities are fully leveraging private market investment and expertise to deploy a robust charging network that serves drivers' needs. By incentivizing more third-party investments in charging infrastructure, make-ready programs increase electrification to generate benefits, such as a downward pressure on rates for all of the utility's customers regardless of whether they drive or ride EVs.

Q. Why does EVgo propose a $5 million budget?

A. While Duke Energy's MRC program estimated a total budget of approximately $3.28M between 2025 and 2027,[42] "the estimated costs, revenues, and forecasted participation for each of the seven customer segments do not constitute firm caps or limits for the proposed program."[43] As a result, the program may ultimately see a higher total budget. Moreover, compared to Duke Energy's 2 million customers,[44] the Company serves over 12 million customers[45] and could reasonably expect a significantly larger level of participation in its program.

Thus, EVgo recommends that this level of funding be initially allocated on a pilot basis with the option to make adjustments as necessary in the future.

Q. How does EVgo recommend this program be funded?

A. One way to fund the make-ready program could be by diverting funding from the Company's other proposals. Specifically, EVgo recommends diverting any costs related to the CEVCS pilot, as the needs the Company seeks to address with this program can be more efficiently addressed by the private market (which I will address next). The

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[42] Docket 20240025-EI, Exhibit TJD-1, "Electric Vehicle Make Ready Credit Program."
[43] Docket 20240025-EI, *Rebuttal Testimony of Timothy J. Duff* at 4.
[44] https://investors.duke-energy.com/news/news-details/2025/New-Duke-Energy-programs-offer-Florida-customers-more-choices-related-to-electric-vehicles/default.aspx.
[45] Docket No. 20250011-EI, *Test Year Notification Pursuant to Rule 25-6.140, Florida Administrative Code*, Document No. 00012-2025 (January 2, 2025), https://www.floridapsc.com/pscfiles/library/filings/2025/00012-2025/00012-2025.pdf at 1.

Commission could also consider whether to divert funds from FPL's EV Technology and Software categories, which FPL plans to use for "exploring emerging technologies and software upgrades to the FPL EVolution app to ensure system integrity and enhance the customer experience."[46] This funding may be better utilized to promote more charging infrastructure by the private market to support EV drivers' experience. Furthermore, while the Company may initially allocate costs for this proposal, EVgo expects the Commission's reasoning when approving Duke's make-ready proposal to apply here as well.[47] Much of those costs will be offset in additional revenue generated, as exemplified in the 2024 Synapse Energy Economics analysis referenced earlier in this testimony.

IV. COMMERCIAL EV CHARGING SERVICES PILOT

Q. What is the purpose of this section of your testimony?

A. In this section of my testimony, I recommend the Commission not approve the Company's proposals regarding the CEVCS pilot.

Q. Please describe the Company's CEVCS pilot.

A. As described by FPL witness Mr. Oliver, the CEVCS pilot allows the utility to install, own, operate, and maintain EV charging equipment on customer premises. The tariff structure (Schedule CEVCS-1) for this service requires the customer to pay a fixed monthly charge that recovers FPL's costs and expenses over the asset's lifespan. As a result, FPL asserts that this tariff has no cost impact on FPL's general body of ratepayers.

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[46] Response to Southern Alliance for Clean Energy's First Set of Interrogatories, Interrogatory No. 8, included in Exhibit RTB-2.

[47] Docket No. 20240025-EI, *Final Order Approving 2024 Settlement Agreement*, Order No. PSC-2024-0472-AS-EI (November 12, 2024), https://www.floridapsc.com/pscfiles/library/filings/2024/09858-2024/09858-2024.pdf at 19.

Q. What is the utility's proposal for the CEVCS pilot?

A. The Company now seeks approval to make this utility-owned EV charging infrastructure offering permanent, and plans to expand the tariff offering beyond charging services for fleet vehicles, to include charging services for all other commercial customers,[48] such as charging stations for multi-unit dwellings, and at destinations such as hospitals, universities, airports, parks, and retail establishments.[49] The Company forecasts that 180 incremental ports will be enrolled in 2026, 180 incremental ports enrolled in 2027, 200 incremental ports enrolled in 2028, and 265 incremental ports enrolled in 2029.[50]

Q. Has the CEVCS pilot been successful?

A. I don't believe so. While FPL defines success by interest and enrollment of commercial customers,[51] FPL has acquired only one customer under this pilot.[52]The Company appears to have 11 other fleet charging customers at 19 sites that have not sought service under this tariff for utility-owned and operated equipment.[53]

Q. What is your position on FPL's proposal to expand the CEVCS pilot?

A. I do not support the proposal to expand this pilot to all commercial customers. The Company has a long track record of interest in TE and, in addition to the CEVCS pilot, has already been approved to own and operate 585 public fast charging ports through its EVolution program by the end of 2025.[54] However, since this approval, utilities across

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[48] *See* Docket 20240025-EI, *Direct Testimony of Tim Oliver* at 40.
[49] Response to EVgo's First Set of Interrogatories, Interrogatory No. 8, included in Exhibit RTB-2.
[50] Response to Staff's Fifth Set of Interrogatories, Interrogatory No. 100, included in Exhibit RTB-2.
[51] Response to EVgo's First Set of Interrogatories, Interrogatory No. 1, included in Exhibit RTB-2.
[52] *See* 2024 CEV Report at 10.
[53] *Id.* and Table 4, showing 190 fast-charging ports for fleets installed or in progress at an average of 10 ports per site, i.e. at 19 sites.
[54] Response to EVgo's First Set of Interrogatories, Interrogatory No. 12, included in Exhibit RTB-2.

over 20 states have primarily moved to the make-ready model including Duke Energy Florida. Given the existing scope and expected continued buildout of FPL's utility-owned network, as well as limited uptake in the existing CEVCS program, a make-ready program is a more appropriate tool to meet TE goals in FPL territory. Thus, the Company should implement the best practice of a make-ready program to support third-party EV charging providers rather than expand its utility-owned network outside of the EVolution program through the CEVCS pilot.

Further, FPL seeks to expand utility-ownership of public fast-charging without demonstrating a clear need for these services that cannot be met by the private sector. The utility states "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."[55] In fact, many EV charging providers, including EVgo, offer a turnkey solution to commercial customers at no cost to the customer, while the utility seeks to charge the customer for the same services. The utility has also not proposed any specific guardrails on this program to limit its use to situations in which the private market cannot provide these services. Given that this duplicates a service existing in the market, a make-ready program, as I have proposed above, may be a more appropriate alternative solution to provide commercial customers with more access to charging services.

Q. What is your position on FPL's proposal to make permanent the CEVCS Pilot?

[55] Response to EVgo's First Set of Interrogatories, Interrogatory No. 8g, included in Exhibit RTB-2.

A. I do not support FPL's proposal. With only one customer enrolled, the pilot has not demonstrated that there is substantial demand to warrant making the pilot permanent.

Q. What does EVgo recommend with regard to FPL's proposed changes to the CEVCS pilot?

A. I recommend the Commission:

- Not adopt the Company's proposal to expand the scope of the CEVCS pilot to all commercial customers, which could have a significant negative impact on the private market for EV charging and is not clearly justified.
- Not adopt the Company's proposal make this tariff permanent, given FPL's limited success and experience with the pilot tariff (i.e. just one customer through the end of 2024) and the lack of a detailed justification in the record of this case for the authorizations that it requests.

V. SUMMARY OF RECOMMENDATIONS

Q. Please summarize your recommendations to the Commission.

A. EVgo recommends the Commission:

- Direct the Company to implement a make-ready program with an annual budget of at least $5 million, that provides incentives of at least $50,000 per stall for DCFC at publicly-accessible locations. In doing so, the Commission would move the state primarily towards a make-ready model as utilities across 20 other states have done to effectively drive deployment of EV charging infrastructure in FPL's service area for the benefit of all of the utility's customers regardless of whether they drive or ride EVs.

- Not adopt the Company's proposal to expand the scope of the CEVCS pilot to all commercial customers, which could discourage private sector investment in EV charging and is not sufficiently justified. Implementing a make-ready program as suggested above would more effectively encourage private sector investment in EV charging.
- Not adopt the Company's proposal to make the CEVCS tariff permanent, given FPL's limited success and experience with the pilot tariff, plus the lack of a detailed justification in the record of this case for the authorizations that it requests.

Q: Does this conclude your direct testimony?

A. Yes.

Noah Garcia

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OVERVIEW

Noah Garcia is a Senior Manager of Market Development and Public Policy at EVgo. Headquartered in Los Angeles, EVgo is the owner and operator of one of the nation's largest electric vehicle (EV) charging networks, with over 1,100 fast charging locations across the United States. Since 2022, Mr. Garcia has engaged in legislative and regulatory venues across the West Coast, including the California Public Utilities Commission, in a manner that supports EVgo's business objectives and facilitates the growth of the EV charging industry. Cumulatively, Mr. Garcia has nearly a decade of experience in clean energy, transportation electrification policy, and utility regulation.

EXPERIENCE

2022 – **Senior Manager, Market Development & Public Policy**
EVgo

Supports EVgo's business objectives through direct engagement in legislative and regulatory processes in California, Oregon, and Washington State

2022 – **Board Member**
Electric Vehicle Charging Association

Provides strategic direction and oversees industry advocacy efforts to support transportation electrification in California, Oregon, and Washington State

2022 **Fellow**
Clean Energy Leadership Institute

Participated in dynamic fellowship program to broaden understanding of energy ecosystem and develop professional leadership skills

2020 – 2022 **Policy Principal**
Advanced Energy Economy

Led California and Colorado utility regulatory advocacy on transportation electrification, distributed energy resource, and integrated resource planning issues

2019 – 2020 **Senior Transportation Analyst**
ICF

Supported clean vehicles and fuels research, stakeholder outreach, and analysis for utility, local government, and non-profit clients

2015-2019	**Transportation Policy Analyst/Schneider Fellow** Natural Resources Defense Council Managed transportation electrification policy advocacy and strategy in the Northeast and Midwest, leading to regulatory approval of over $50 million in utility EV investments

EDUCATION

2015	**M.A., Public Policy (Energy and Environment Concentration)** Stanford University
2014	**B.A., International Relations (Economics Concentration)** Stanford University

PUBLICATIONS

Garcia, N. (2019). Transportation Electrification in New York: Opportunities and Challenges. *Environmental Law in New York*, *30*(7), 125–133.

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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