



Via electronic submission to board.secretary@bpu.nj.gov

June 17, 2020

TO: Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350,
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FROM: EVgo
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RE: Request for Comments - New Jersey Electric Vehicle Infrastructure Ecosystem 2020 Straw Proposal

Secretary Camacho:

Enclosed please find comments submitted on behalf of EVgo, pursuant to the notice released by the Board of Public Utilities regarding the New Jersey Electric Vehicle Infrastructure Ecosystem 2020 Straw Proposal.

Thank You.

Carine Dumit

Carine Dumit, EVgo
Director, Market Development & Public Policy – East

I. Introduction

EVgo commends Governor Murphy, the New Jersey legislature, and the Board of Public Utilities (BPU) for their efforts in accelerating New Jersey's advancement in clean transportation technologies and solidifying New Jersey as a national leader in the deployment of clean transportation. The Electric Vehicle (EV) charging industry continues to make progress in building out the EV charging infrastructure in the U.S., and companies like EVgo welcome the opportunity to work closely with all stakeholders to continue to expand on those efforts to enable mass adoption of EVs.

EVgo appreciates this opportunity to participate in BPU's process and continue to engage on this topic. We thank Staff for their hard work in developing the Straw Proposal¹ and are pleased to provide these comments on as a follow on to the online technical conference convened on June 3rd 2020².

EVgo operates America's largest public electric vehicle fast charging network, with more than 800 direct current fast charging (DCFC) locations located in 34 states and 66 metro markets nationwide. Fast charging is crucial to enabling electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs³, drivers utilizing key transit corridors, as well as light duty vehicle (LDV) fleets, including car and rideshare applications. Today, more than 100 million Americans live within a 15-minute drive of an EVgo charger and roughly three quarters of New Jersey residents live within a 20-minute drive of one of EVgo's approximately 46 New Jersey fast chargers. EVgo recently completed energization of several DCFC locations on the New Jersey Turnpike and Garden State Parkway in collaboration with PSE&G⁴ and looks forward to further expansion across New Jersey.

EVgo is pleased to see Staff proposing, in its Straw, a multi-pronged approach that encompasses the entire "ecosystem" addressing infrastructure costs, underlying structural barriers such as rate design as well as soft costs, in a shared-responsibility model, to achieve New Jersey's Transportation Electrification objectives in a cost-effective manner.⁵

Below, EVgo shares its comments and feedback on the Straw Proposal's elements.

II. The "Shared Responsibility" Business Model for Ownership, Maintenance and Advertising of EV infrastructure— Section A

The Straw proposal recommends a "shared responsibility" model where Electric Distribution Companies (EDCs) will "invest in (and earn on) the wiring backbone infrastructure necessary to enable a robust EV ecosystem, while the private sector owns, operates, and advertises the EVSE (Electric Vehicle Service Equipment)" making locations where EVSE is to be sited "Charger Ready". Essentially, staff is proposing that EDCs invest in and recover the cost of "make-ready" infrastructure.

¹ New Jersey Electric Vehicles Infrastructure Ecosystem 2020 Straw Proposal. Docket #QO20050357: in the matter of Straw Proposal on electric vehicle infrastructure buildout.

² EVgo participated in the online technical conference and presented at the third panel, on how to design and integrate EV charging into the rate structure

³ See https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf

⁴ See <https://www.psegpoweringprogress.com/electric-vehicles/>

⁵ Plug-in Vehicle Act requirement for at least 400 public DCFC by December 31, 2025. S-2252 (P.L. 2019, c. 362; C.48:25-1 et seq); New Jersey Energy Master Plan, see <https://www.nj.gov/governor/news/news/562020/approved/20200127a.shtml>

In fact, one area where consensus exists on the role of utilities is on make-ready. EDCs investing in the conduit and other electrical infrastructure leading up to the charger is a logical role and a “win-win” allowing an EDC to focus on its core competency, enable more load for it to serve, reduce capital costs for third-party charging companies, and increase private investment. Utility “make ready” programs bring rate-based distribution upgrades and branch line extensions into the utility scope, while leaving dispenser ownership, marketing, customer service, and network operation in the hands of experienced private operators. The result leverages utilities’ strengths in infrastructure buildout with the scale, learning and efficiencies that private developers have built over thousands of installs and hundreds of thousands of satisfied customers.

Make-ready infrastructure investments also avoid potential issues with ownership such as the utility’s ability to set public pricing at rates too low for the private market to compete, which may discourage competition, or through overbuild, to effectively “consume” the usage that, in early years, electric vehicle service providers (EVSP) rely upon to evaluate the business case of a potential EVSE investment.

Make-ready infrastructure programs maximize private sector investments by significantly improving economics to cover behind-the-meter investments. This helps keep costs low for ratepayers while catalyzing private sector investment and considering competitive market concerns.

III. Process for Making a Location Charger Ready - Section B

Under this Straw Proposal, the EDCs will have primary responsibility for making locations “Charger Ready”. EDCs would make a location Charger Ready “upon request from an EVSE Infrastructure Company or a state, local, or municipal entity, with priority given to sites recommended as part of the EV Mapping Effort”. In addition, the Straw proposal would institute guidelines that appear to incentivize EDCs’ efforts to expedite development timelines. Specifically, the EDCs “would have twelve (12) months from the date of the request to make a site Charger Ready. Staff anticipates that any delay greater than 12 months would result in reduced EDC earnings on that portion of the Charger Ready infrastructure”.

EVgo appreciates this effort to reduce development timelines (and therefore costs), an important element of DCF (and EVSE) economics. Given the work involved in making a site Charger Ready is within the EDCs’ core competencies, EVgo believes that a reasonable timeframe of no longer than 6 months could be more fitting, without disrupting internal EDC processes and timelines, and agree that dis-incentivizing timelines of longer than 12 months as is proposed in the Straw is appropriate.

In addition, EVgo also commends Staff for allowing EDCs, as part of the Shared Responsibility model, to seek cost recovery for the development of hosting capacity maps. Capacity maps from utilities are key to streamline EV charging development. This is an area in which the EDCs have significant experience in, and ability to drive the expansion of charging infrastructure. Providing this data upfront to EVSPs will enable better resource and time allocation during the development process. When EVSPs have the necessary means to investigate utility service themselves, utility engineering teams can focus their time accelerating construction and commissioning rather than responding to volumes of site assessment requests.

Reducing these soft-costs barriers can indeed have dramatic effects on the timing of beneficial electrification. They represent threshold, catalytic, and highly efficient uses of funds and should be treated as rate-based investments on par with capital equipment.

On the flip side, EVgo cautions against employing mapping efforts specifically to direct third party EVSE deployment and/or prioritize make-ready for non-utility owned EVSE stations. Electric vehicle service providers already have sophisticated demand-prediction models, and often existing charger host relationships. Funders can both speed their program’s implementation and obtain more “used and useful” sites by allowing the DCFC developers to identify and contract with specific site hosts with flexibility to meet broader program objectives.

Further, given EVgo’s sophisticated mapping software, as well as its own proprietary usage data from over 800 locations across the United States, EVgo is well-equipped to direct siting of its own chargers. EVgo’s business model is based on the utilization of the charger, meaning that its interests are aligned with the customer, and EVgo will site in the areas of the state that have the highest consumer demand and will be best utilized, avoiding the risks of stranded assets.

EVgo has noticed that mapping efforts by state agencies, though well-intentioned, often miss the mark on where demand is the highest, as state agencies lack such charger utilization data and experiences that EVSPs have built over years. As such, EVgo recommends that the EV Mapping Effort⁶ be informative rather than prescriptive. To date, EVgo has yet to participate in any make-ready program with prescriptive location requirements set forth through mapping and notes that efforts to prescribe locations by state agencies have resulted in low participation in programs. In fact, New Hampshire’s recent light duty charging solicitation under the Volkswagen Settlement resulted in no qualifying proposals. This was largely attributed to a program that was over-designed, overly prescriptive in its inclusion of specified charger siting location, equipment choice, and other program elements.

IV. Ensuring Equitable Distribution of EVSE – Section C

The Straw Proposal seeks to address an important element of transportation electrification, that of equity and equitable distribution of the benefits of transportation electrification.

In its Straw Proposal, BPU Staff call for the Straw to “ensure equitable geographic diversity, particularly with respect to ensuring a viable EV Ecosystem in low-income, urban, environmental justice communities, or rural communities, referred to collectively as ‘Equity Areas,’ or along designated evacuation routes” and further states that “Staff is cognizant of the socio-economic and demographic challenges associated with ensuring equitable delivery of EV charging to all New Jersey drivers”⁷.

EVgo strongly supports these objectives and continues to work to advance and advocate for greater equity in transportation electrification. In fact, EVgo notes its strong record of deploying EV charging in traditionally underserved communities and notes that 40% of EVgo deployments in California are in low income areas⁸. That is because density, not a community’s income level, is a more likely indicator of “hard to reach” and where utility intervention may therefore be most appropriate. Dense, urban populations of all income levels can support competitive DCFC investment⁹, as apartment dwellers as well as rideshare and carshare drivers are often high mileage drivers who frequently need public

⁶ “EV Mapping Effort” refers to the effort to map existing and proposed EV Ecosystem investments, under the lead of the Department of Environmental Protection (“DEP”), in conjunction with the Board and other Agencies.

⁷ New Jersey Electric Vehicles Infrastructure Ecosystem 2020 Straw Proposal, p. 11

⁸ EVgo, Progress Report to California Public Utilities Commission Electric Vehicle Charging Station Project (2019), p.3

⁹ A recent report from California Energy Commission found no correlation between income level and DCFC deployment: SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment. Presentation - CEC SB 1000 Workshop, on 6/4/2020. Docket Number 20-TRAN-02.

charging to enable them to take advantage of the benefit of electric vehicles. For these reasons, EVgo has largely focused on deploying charging in metro markets where EV drivers are more unlikely to have access to home charging. Nationally, EVgo's network sees its highest use in metro areas given the likelihood of both multifamily residents charging, but also rideshare electrification, which necessitates more fast charging for EV drivers who may charge once or even twice per day. Rideshare electrification will necessitate a wider build-out of DCFC in urban areas to ensure widespread access and availability for both rideshare and personal use drivers, while also promoting economic development.

In contrast, rural or ex-urban areas with more dispersed demand and prevalent home charging may lag in private investment. This is an area where EDCs may step in to fill the gap. As such, the BPU may want to explore utility-ownership of EVSE in hard-to-reach areas, specifically rural and areas of low population density, where the private market may have a more challenging time deploying given lower battery electric vehicle deployments.

If designed correctly, the make-ready model could also be an important first step for addressing equity concerns. EVgo believes equitable outcomes can be achieved through effective program design that prioritizes these communities in proposals or site applications. For example, in California, Pacific Gas & Electric was allocated \$22.4MM for a make-ready DCFC program. The program has a goal to support 234 DCFC and has a stated requirement for a percentage of deployments to occur in disadvantaged communities. Similarly, this program provides site hosts in disadvantaged communities – typically the customer of record on the charger's electricity bill – a rebate toward the cost of the DCFC in addition to the make-ready investment by the utility. Ultimately, EV growth and therefore increased EV penetration on the electric grid will create downward pressure on rates for all customers, allowing for the benefits of electrification to have broad reach.

V. Rate Design Reforms Designed to Encourage Adoption of Electric Vehicles - Section D

EVgo commends Staff for underscoring the importance of rate design as a complementary element to utility make-ready infrastructure investments:

“by allowing the EDCs to build on (and earn on) the Charger Ready infrastructure, combined with effective rate design reform, the total cost outlay for EVSE Infrastructure Companies is reduced and improve the likelihood of a robust market response¹⁰.”

EVgo could not agree more with that statement.

Section D of the Straw Proposal discusses the rate reforms that are necessary to encourage the adoption of EVs. With respect to the rates for commercial EV (CEV) charging, the Straw Proposal correctly focuses on the critical barrier that demand charges represent to establishing CEV rates that allow EVs to charge at costs that are competitive with liquid fuels. A DC fast charger may draw at or close to its nameplate demand each month, even when the total monthly energy dispensed is very low. Standard commercial rates with significant demand charges can thus result in prohibitively high effective energy costs per kWh dispensed – costs that are significantly higher per mile than gasoline or diesel. These rate structures distort incentives in ways that hinder EV adoption. In markets where demand charges are high, DCFC

¹⁰ New Jersey Electric Vehicles Infrastructure Ecosystem 2020 Straw Proposal, p. 8

operators are always better off building relatively smaller networks, even at high EV penetration levels. Consumers are likewise incented to delay EV purchases, as public DCFC chargers are few and often occupied.

We agree that the demand charge issue is particularly acute during the initial years of EV deployment, when many stations experience low utilization. However, longer-term rate reform is still needed to support critical DCFC network development and promote a satisfactory customer experience. In turn, when demand charges are low, it is incumbent on EVSPs to respond to higher EV penetration levels (and higher utilization levels) by building new stations to alleviate congestion.

BPU Staff has requested feedback on the best means to reduce the demand charge barrier and suggests two possible approaches. The first is to provide subsidies on operating costs to the extent that a DCFC station's per kWh bill exceeds a certain "set point" that would be based on the estimated costs of competing liquid fuels such as gasoline or diesel. The set point would be benchmarked such that commercial EV charging remains competitive with these liquid fuels on a per-mile traveled basis.

The second alternative would be to allow a CEV customer to elect to waive a percentage of the station's demand charges for the first 5 years of its operations, with the ability to seek a 5-year extension of this waiver in the case of stations whose usage remains below 25% of the hours in a month. The Straw Proposal also focuses on the development of time-of-use (TOU) rates so that stations have an incentive to encourage customers to charge their EVs at times when the electric grid can readily accommodate the increased demand.

EVgo strongly favors the second option – the demand charge waiver – for the following reasons:

First, the "set point" subsidy will be difficult to establish and administer, would increase the volatility and uncertainty in station revenues, and will be difficult to translate as EVSPs provide pricing to customers. Converting a charging rate in dollar per kWh into the dollar per gallon of a liquid fuel requires assumptions about the efficiencies of both (1) the EVs that use the station and (2) the alternative liquid-fueled vehicles that the station's customers would otherwise drive.

Benchmarking the charging rate to liquid fuels also will require an accepted, transparent, widely available index of local fuel costs. Rules would be needed for the updating process, as well as utility and commission staff time for calculating, administering, and reviewing the indexed rebates. The prices for gasoline and diesel are influenced strongly by the world oil market and can change significantly and unexpectedly in a short period of time. The steep drop in gasoline and diesel prices resulting from the current COVID-19 pandemic is a good example of an unexpected price drop; recent history also provides examples of major price spikes as a result of natural disasters and political turmoil impacting oil markets. As a result, an electric rate benchmarked to fossil fuel prices could result in volatile and uncertain revenues for station owners. Electric rates tend to be more stable than gasoline or diesel prices, and the advantage of this stability could be lost.

One experience worth highlighting is New York's state-wide DCFC per-plug incentive opened in early 2019, emphasizes that a subsidy is not a true substitute for the rate reform necessary to grow infrastructure deployments in a sustainable way. While well-intentioned, New York's per-plug incentive

program programmatic complexities and onerous data reporting requirements has resulted in only fewer than 10 successful applicants¹¹.

Second, there are significant advantages to the demand charge waiver. The waiver addresses the demand charge barrier directly. Reducing demand charges will lower the per unit cost of charging, . This is essential to removing or lowering the demand charge barrier that is most acute in the early years of EV adoption. Perhaps most important, a waiver applicable for an approximately 5 to 10-year period with a potential phase in later years provides a significant degree of long-term certainty in the rate structure applicable to charging stations. This allows station developers to plan for investments in new stations with more certainty in their cost structure. EVgo emphasizes that the waiver should be designed such that the resulting rate is competitive with liquid fuels even at relatively low station utilizations, but the rate should not be indexed to liquid fuel prices to avoid the problems discussed above with the “set point” subsidy.

Southern California Edison (SCE) received approval from the California Public Utilities Commission in May 2018 for a suite of new commercial EV charging rates that became available in early 2019¹². SCE’s new commercial EV rate schedules are all-volumetric TOU rates. A key feature of the new SCE rates is a five-year holiday from all demand charges, with the expectation that EV penetration will be higher after the holiday, rendering demand charges less important. This rate is cost-based. The costs that would have been collected in demand charges are moved to the TOU volumetric rates. In years six to ten, most of the demand charges from SCE’s applicable standard commercial rates will be phased back into the EV rates, with corresponding reductions in the TOU volumetric rates. This may create longer term uncertainty for investments given the 8-10 year+ useful life of a charger, but in general is still a best practice for an EV rate. Table 1 compares SCE’s new EV-8 rate to its TOU-GS-2 rates that apply to other medium commercial customers of similar size.

Table 1: SCE’s EV-8 Rate, compared to TOU-GS-2¹³

Rate Element	Season	TOU Period	EV-8	TOU-GS-2	
				Option D	Option E
Customer (\$/meter/month)	All	n/a	\$133.31	\$133.31	\$133.31
Demand (\$/kW-month)	Summer	On-peak	None for Years 1-5	\$30.01	\$4.40
		All hours		\$11.46	\$7.96
	Winter	Mid-peak		\$7.64	\$0.85
		All hours		\$11.46	\$7.96
Energy (\$/kWh)	Summer	On-peak	\$0.52	\$0.13	\$0.53
		Mid-peak	\$0.28	\$0.12	\$0.19
		Off-peak	\$0.14	\$0.09	\$0.13
	Winter	Mid-peak	\$0.32	\$0.11	\$0.17
		Off-peak	\$0.14	\$0.10	\$0.10
		Super-off-peak	\$0.10	\$0.07	\$0.09

¹¹ Case No. 18-E-0138: Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, New York, Joint Comments of EVgo, ChargePoint, and CALSTART

¹² See CPUC Decision 18-05-040, Ordering Paragraph 45, and SCE Advice Letter 3853-E (filed August 29, 2018) to implement the new commercial EV rates approved in that order.

¹³ See Appendix A

Is important that the BPU considers several rate design principles when evaluating rate design proposals especially in the context of the state’s transportation electrification policy objectives. As EVgo describes it a recent white paper¹⁴, EVgo submits that rates should:

- **Be cost based.** Rates optimized for EVs should be cost-based and do not need to be subsidized. Rates should reflect the utility’s underlying time-varying marginal costs, to encourage charging at costs that accurately reflect grid conditions. Recovery of marginal costs to serve, without costs associated with existing infrastructure or unrelated utility programs, may best meet policy goals to promote transportation electrification and fuel switching incentives. This will allow EV drivers to realize the fuel cost savings that are a primary motivator of EV purchases, and, by encouraging higher EV penetration, will increase the incremental electric revenues that benefit all ratepayers.

In fact, the California commission recognized that CEV customers generally provide new, incremental, growing loads to which costs have yet to be allocated. As a result, in the Commission’s words, “any revenue collected from the new class [of CEV loads] beyond the marginal cost to serve them is an overcollection.”¹⁵

- **Minimize demand charges and maximize the use of TOU volumetric rates, particularly when utilization of the charging infrastructure is low.** This does not create a cost shift if TOU rates are cost-based and represent incremental revenues. Emphasizing accurate TOU rates over demand charges ensures that operators of DC fast chargers focus on encouraging their customers to charge at times that provide the most system benefits, rather than trying to minimize demand charges.
- **Provide options.** When devising rate structures, it is important for EV charging operators to have the option and ability to switch to a standard commercial rate schedule. Providing rate options will give operators more tools to adapt their pricing to both customer preferences and system needs, as their load factor and diurnal profile change. Additionally, charging is not a one-size-fits-all application. Rural, standalone, low usage, high capacity chargers have different economics and cost causation than urban or suburban ones served on the host power of a large retailer.
- **Not punish early movers.** EVgo strongly urges the BPU to consider the importance of preserving the existing EVSE/DCFC infrastructure base by ensuring that new rates and tariff structures intended to expand charging infrastructure are applicable to EVSEs universally – meaning existing and new deployments. In anticipation of significant increases in demand, private providers have already installed thousands of charging stations nationwide. Hundreds of stations will approach their end of life of the original charging equipment in the next five years, and/or were built with “future proofing” enabling significant expansion.

Another approach to rate design EVgo urges the BPU to consider is to examine technology-neutral low load factor tariffs. Several EDCs have opted to leverage existing rates designed to industry specific load shapes, and many Commissions already have rates in place designed to accommodate “spiky” loads

¹⁴ “Best Practices for Electric Vehicle Market Transformation (2019)”, EVgo. <https://www.evgo.com/whitepapers>

¹⁵ CPUC Decision No. 19-10-055, at p. 44.

similar to those of DCFCs— for example, agricultural uses – where rate designs intended for commercial use had disproportionate impacts on off-peak users. Simply maintaining DCFC eligibility for “Low Load Factor” or “Pivot Irrigation” rates can be a simple, effective adaptation. Such tariffs are currently made available to low-load factor commercial and industrial customers in Dominion’s territory in Virginia¹⁶, and Madison Gas and Electric, in Wisconsin¹⁷.

Table 2 below provides a summary of different rate reforms adopted by several EDCs to support transportation electrification efforts. More than 14 states have adopted across the country, not counting technology-neutral rates.

Table 2. Exemplary EV-friendly rates – Commercial EV and technology-neutral low load factor rates, as adopted.

Utility	Exemplar Rates
Southern California Edison, CA	TOU – EV – 8 - All volumetric TOU rates for first 5 years , with demand charges phased back in years 6-10 - TOU volumetric energy charges increased to recover costs
Eversource, CT	EV Rate Rider Pilot (EVRPP) - Demand charges of the applicable commercial rates are converted to an equivalent \$/kWh charge for all kWh utilized by the DCFC customer during each billing period
SDG&E, CA	TOU – M (Interim Rate) - While the EV rate is finalized, sites can temporarily switch onto this rate with a \$2.50/kW demand charge and the 40 kW demand cap waived
Dominion, VA	GS – 2 (Non-Demand) - Low usage sites (<200 kWh per kW) qualify for this non-demand general service rate
Madison Gas & Electric, WI	Low Load Factor Provision - Commercial customers on rate schedules Cg-4, Cg-2, or Cg-2A; annual electric load factor <15%. On-Peak Demand Reduction of 50%
DTE Energy, MI	GS – D3 - The 1000 kW demand cap for this non-demand general service rate is waived for DCFCs through June 1, 2024

Finally, it is apparent that the significant low-hanging fruit to transportation electrification efforts is in ensuring electricity rates accurately reflect the local and system-wide benefits and costs EV charging brings to the grid and to the community at large. Relief from demand charge, technology neutral low load factor rates, and other rationalization of commercial EV tariffs will be necessary to reduce “effective kWh” pricing to levels that recognize the value of beneficial load.

It will be challenging for EV infrastructure to truly scale in New Jersey without rate reform, which is why public service commissions across the country are either reviewing or have approved commercial EV rates or technology neutral low load factor rates. Electric vehicle service providers like EVgo prioritize investments largely based on rate design, and in this way, rate design can be the most important factor for driving infrastructure deployments in a given utility territory.

¹⁶ Virginia Electric and Power Company, Schedule GS-2: Intermediate General Service. Filed 05-20-19

¹⁷ Madison Gas & Electric, Low Load Factor Provision available to commercial customers on rate schedules Cg-4, Cg-2, or Cg-2A with an annual electric load factor less than 15 percent.

<https://www.mge.com/customer-service/for-businesses/electric-rates/low-load-factor-provision#:~:text=Low%20Load%20Factor%20Provision,factor%20less%20than%2015%20percent.>

VI. Conclusion

In closing, EVgo once again thanks the BPU for its leadership on transportation electrification, and staff for their hard work in moving this vision forward. The BPU has a unique opportunity before it to catalyze private sector and rate-payer funding in a cost-effective and meaningful way and enable these efforts. A wide array of stakeholders will have key roles to play and will be critical to supporting near and medium-term deployment of the public fast charging infrastructure needed for effective transportation electrification, the benefits of which will be far-reaching. EVgo looks forward to continuing our collaboration with all stakeholders to further support this important initiative and advance a new era of clean transportation in New Jersey.

Appendix A.

Additional notes on Table 1 - SCE's EV-8 Rate, compared to TOU-GS-2

- EV-8 is applicable to commercial EV charging customers with maximum loads between 20 kW and 500 kW. TOU-GS-2 applies to commercial customers with loads between 20 and 200 kW.
- Option D is the default rate for TOU-GS-3 customers. Option E is an optional rate available to all TOU-GS-2 customers.
- The following table shows SCE's TOU periods:

Season	TOU Period	Hours
<i>Summer</i>	<i>On-peak</i>	<i>4p to 9p weekdays</i>
	<i>Mid-peak</i>	<i>4p to 9p weekends</i>
	<i>Off-peak</i>	<i>All other hours</i>
<i>Winter</i>	<i>Mid-peak</i>	<i>4p to 9p all days</i>
	<i>Off-peak</i>	<i>9p to 8a all days</i>
	<i>Super-off-peak</i>	<i>8a to 4p all days</i>