

**BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE PETITION OF	:	
ATLANTIC CITY ELECTRIC COMPANY FOR	:	
APPROVAL OF A VOLUNTARY PROGRAM	:	BPU DOCKET NO. EO18020190
FOR PLUG-IN VEHICLE CHARGING	:	
	:	
	:	
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**PREPARED DIRECT TESTIMONY OF  
CARINE DUMIT  
ON BEHALF OF EVgo SERVICES LLC**

**SEPTEMBER 18, 2020**

1   **Q.     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS**

2   A.     My name is Carine Dumit. My business address is 11835 W. Olympic Blvd. Suite  
3   900E Los Angeles, CA 90064

4   **Q.     PLEASE DESCRIBE YOUR EXPERIENCE AND QUALIFICATIONS**

5   A     I am Director of Market Development at EVgo Services, LLC for the Eastern U.S. In  
6   my role, I work with public utilities commissions, state legislatures, state agencies, and other  
7   entities across the country to advise on program design and rate design solutions to encourage  
8   transportation electrification. Prior to EVgo, I was Director of Policy and Electricity Markets  
9   at SolarCity where I led the company's policy and regulatory initiatives impacting customers'  
10   adoption of Distributed Energy Resources ("DER") in New England, and then Senior Policy  
11   Advisor at Tesla where I managed a portfolio of electric vehicle ("EV") and DER related policy  
12   initiatives in the Northeast. I have worked for more than a decade in the energy sector on issues  
13   pertaining to wholesale and retail power, large scale renewable generation, DER and  
14   transportation electrification. Early in my career, I worked at the consultancy firm ICF  
15   International where I performed analyses on power markets. I was also a consultant in Booz  
16   Allen Hamilton's energy practice where I supported federal agencies on matters related to  
17   renewable energy programs and policies. I have participated in several stakeholder  
18   engagements addressing transportation electrification issues. In New Jersey specifically, I was  
19   one of the presenters at the BPU's public meeting convened earlier this year, on June 3rd, 2020,  
20   discussing the New Jersey Electric Vehicle Infrastructure Ecosystem 2020 Straw Proposal

1 (“Straw Proposal”).<sup>1</sup> I also filed testimony on certain EV issues in the pending Public Service  
2 Electric and Gas Company (“PSE&G”) case involving EV and storage matters.<sup>2</sup>

3 I hold a Master of Science degree in engineering management and a Bachelor of Science degree  
4 in systems engineering, both from The George Washington University.

5 **Q. ON WHOSE BEHALF ARE YOU APPEARING IN THESE PROCEEDINGS?**

6 A. I am appearing on behalf of EVgo. EVgo owns and operates America’s largest public  
7 EV fast charging network, with more than 800 direct current fast charging (“DCFC”) locations  
8 across the nation. The owner-operator model aligns charging network interests with those of  
9 the customers, as reliability is key to the network’s economics and the driver’s ability to receive  
10 a charge. Accordingly, EVgo prides itself on its reliability, with a 98% uptime rate across our  
11 chargers. In the first quarter of 2019, EVgo announced that it was the first U.S. public EV  
12 charging network to contract for 100% renewable energy. Today, more than 115 million  
13 Americans live within a 15-minute drive of an EVgo fast charger and roughly three quarters  
14 of New Jersey residents live within a 20-minute drive of one of EVgo’s approximately 46 New  
15 Jersey fast chargers. In August 2020, EVgo announced a partnership with General Motors  
16 (“GM”) whereby EVgo will triple its DCFC network across 40 metropolitan areas over the  
17 coming years and build more than 2700 fast chargers across the country. EVgo also works

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<sup>1</sup> New Jersey Electric Vehicle Infrastructure Ecosystem 2020 Straw Proposal. BPU Docket No. QO20050357

<sup>2</sup> In the Matter of The Petition of Public Service Electric Gas Company for Approval of Its Clean Energy Future-Electric Vehicle and Energy Storage (“CEF-EVES”) Program on A Regulated Basis, BPU Docket No. EO18101111.

1 with other automakers, such as Nissan as well as Transportation Network Companies, such as  
2 Uber and Lyft<sup>3</sup> to expand charging to important EV markets<sup>4</sup>.

3 In New Jersey, EVgo is actively evaluating its expansion plans. EVgo's expansion in specific  
4 markets will depend on a number of factors, including consumer vehicle demand, utility rate  
5 designs, and programs that allow for successful private-public partnerships such as utility  
6 make-ready programs and/or programs run by state agencies such as New Jersey Department  
7 of Environmental Protection<sup>5</sup>.

8 **Q. WHAT IS EVgo's INTEREST IN THIS PROCEEDING?**

9 A As mentioned in EVgo's request for Intervenor status, EVgo's participation in this  
10 docket is to provide comments on Atlantic City Electric ("ACE")'s voluntary program for  
11 Plug-In Vehicle Charging <sup>6</sup> specific to DCFC, based on its unique experiences as the nation's  
12 largest provider of public fast charging. EVgo believes that the outcome of this proceeding will  
13 have a substantial impact on the nature, growth, and economics of the competitive market for  
14 DCFC, a market which EVgo is currently an active participant. In New Jersey, EVgo currently  
15 owns and operates 46 chargers, with a small footprint in ACE territory with interest in  
16 expansion. EVgo aims to provide input that will support the Board in assessing the various

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<sup>3</sup> See <https://www.uber.com/newsroom/driving-a-green-recovery/> and <https://www.evgo.com/uber/> see <https://www.evgo.com/about/news/evgo-expands-local-fast-charging-network-and-supports-lyft-in-denver/>

<sup>4</sup> See <https://www.evgo.com/about/news/were-working-with-general-motors-to-triple-the-size-of-our-fast-charging-network/> and see <https://www.evgo.com/about/news/nissan-and-evgo-expand-charging-network-with-200-new-ev-fastchargers/>

<sup>5</sup> In an e-mail announcement dated August 2, 2020 NJ DEP stated that it received over 123 applications requesting funding of \$213 million, in addition to numerous applications for fast charging stations under the It Pay\$ to Plug In program

<sup>6</sup> Verified Amended Petition for Approval of a Voluntary Program for Plug-In Vehicle Charging; In the Matter of the Petition Of Atlantic City Electric Company for approval of a Voluntary program for Plug-In Vehicle Charging. BPU DOCKET NO. EO18020190. December 17, 2019

1 approaches to implement, grow, and support of a competitive market for DCFC. EVgo's  
2 interest is that in the Board's evaluation of ACE's program, it ensures that deployment of  
3 DCFC stations in New Jersey is undertaken in a way that complements and encourages rather  
4 than hinders efforts underway to expand private EV charging networks by the private market.  
5 EVgo is also an active stakeholder in the BPU's docket pertaining to the Straw Proposal and  
6 an intervenor in the pending PSE&G case involving EV and storage matters.

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY**

8 A. EVgo puts forth this testimony to provide the Commission, ACE and stakeholders in  
9 this matter as a private sector owner-operator of DCFC with experience across the U.S., in 34  
10 states, including New Jersey. With that, EVgo hopes its input will aid the proceeding and BPU  
11 in assessing the various approaches to implement, grow, and catalyze investments in the  
12 competitive market for DC fast charging network in New Jersey and advance the state's  
13 transportation electrification commitments and objectives.

14 **Q. WHAT IS THE SCOPE OF YOUR TESTIMONY?**

15 A. My testimony will primarily focus on ACE's proposed Offering 7 (Utility Owned  
16 DCFCs) Offering 9 (Non-Utility-Owned DCFC).

17 **Q. PLEASE DESCRIBE THE DIFFERENT CHARGING BUSINESS MODELS**

18 A. The EV charging sector is comprised of companies whose purposes and business  
19 models vary, but fundamentally there are vendors and operators. Vendors are the equipment  
20 manufacturers and information technology providers who design, produce, and sell hardware  
21 and software to enable EVs to charge. Owner operators develop, finance, build, own, operate,  
22 and manage charger networks.

1 At this nascent stage of market development, some companies focus on a single slice  
2 of that value chain—provision of network management software, for example—while others  
3 cover multiple pieces (e.g. hardware sales and network management services)<sup>7</sup>. As mentioned  
4 earlier, EVgo is an owner-operator. In addition to developing, financing, owning, and operating  
5 the charging network, EVgo works with site host partners the country to deploy EV charging  
6 solutions.

7 EVgo also maintains the customer relationship with the EV driver and provides a 24/7  
8 call center. EVgo is also responsible for operations and maintenance of its EV charging  
9 network, which has 98% uptime across the country.

10 **Q. PLEASE DESCRIBE THE DIFFERENT TYPES OF VEHICLE CHARGING**

11 A. It is worth recognizing the different types of charging infrastructure and distinguish the  
12 capabilities of each.

- 13 • Level 1 chargers deliver electricity through a 120 volt plug and are most often used in  
14 homes through an existing conventional outlet.
- 15 • Level 2 charging typically provides a full charge in 4 to 8 hours and is sought in  
16 longer duration, long dwell-time locations such as work, overnight at home, in  
17 amusement parks, or other destinations where drivers may spend several hours.
- 18 • Public DCFC is suited for quick charge needs both in and around cities and suburbs  
19 and along high-traffic transit corridors. DCFCs are located at or near places where  
20 drivers live, drive, and shop, including retail locations, restaurants, and grocery stores

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<sup>7</sup> “The Costs of EV Fast Charging Infrastructure and Economic Benefits to Rapid Scale-Up.” May 18, 2020.  
By Jonathan Levy, Isabelle Riu, Cathy Zoi. EVgo.  
[https://www.evgo.com/wpcontent/uploads/2020/05/2020.05.18\\_EVgo-Whitepaper\\_DCFC-cost-and-policy.pdf](https://www.evgo.com/wpcontent/uploads/2020/05/2020.05.18_EVgo-Whitepaper_DCFC-cost-and-policy.pdf)

1 where an EV can receive up to 80% charge in 30-45 minutes so customers can charge  
2 their vehicles in the time it takes to run their errands. DC fast charging serves a  
3 variety of drivers' needs, as discussed below.

4 **Q. GIVEN EVgo'S EXPERIENCE IN THE DCFC SECTOR, WHAT TYPES OF**  
5 **DRIVERS' NEEDS DOES DCFC SEEK TO SERVE?**

6 A. DCFC serves a variety of drivers' needs. In the earliest stages of EV infrastructure  
7 deployment, DCFC was viewed as purely a solution to assuage the range anxieties of single-  
8 family homeowners, especially on trips between cities or across the country. As a result, much  
9 early DCFC deployment focused on high traffic transit corridors, service plazas and rest areas  
10 along interstates and along major highways.

11 DCFC, however, offers more than just a corridor use case in that fast chargers play an  
12 important role in dense, urban and suburban areas where not every home has a driveway,  
13 attached garage, or in many cases any dedicated parking. In fact, according to the International  
14 Council on Clean Transportation, apartment dwelling EV drivers, living in Multi-Unit  
15 Dwellings (MUDs) rely on public charging for 50-80% of their charging<sup>8</sup> as they would  
16 typically not have access to dedicated parking or home charging. Siting fast chargers in  
17 community locations around existing amenities (e.g. retail, groceries, restaurants) allows for  
18 charging to be integrated into everyday activities.

19 In addition to personal use drivers, DCFC also provide for fast and convenient charging  
20 for light duty fleets, especially in rideshare and delivery applications. Since light duty fleet  
21 drivers drive on average three to seven times more than a personal use driver, they need access

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<sup>8</sup> International Council on Clean Transportation, *Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets* (January 2019), p. 9,  
[https://theicct.org/sites/default/files/publications/US\\_charging\\_Gap\\_20190124.pdf](https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf)

1 to fast charging that is also located around amenities so that the time spent on charging aligns  
2 with breaks for food, rest, or restroom use to allow driver to quickly get back on the road.

3 **Q. WHAT FACTORS ARE CONSIDERED IN THE EVALUATION AND**  
4 **DEVELOPMENT OF PUBLIC FAST CHARGING INFRASTRUCTURE BY**  
5 **PRIVATE SECTOR OWNER-OPERATORS?**

6 A. Several factors play a role in identifying locations for DCFC, including but not limited  
7 to: traffic patterns, density of Battery Electric Vehicle (“BEV”) ownership, proximity to  
8 amenities, proximity to other fast chargers, distance to or location of major roadways, and  
9 utility tariffs, among others. Dense, urban and suburban populations of all income levels can  
10 support competitive DCFC investment. Third-party Electric Vehicle Service Providers like  
11 EVgo have sophisticated tools and models developed with over a decade of experience in EV  
12 charging development. Such tools are utilized in network planning to assess where maximum  
13 opportunity for use of fast chargers and convenience of BEV drivers may exist, be it at  
14 commercial or government-owned properties.

15 In terms of enabling market mechanisms, policies and regulatory initiatives to promote  
16 EV adoption, in combination with make-ready infrastructure and EV-friendly tariffs that  
17 minimize demand charges in favor of volumetric charges provide for a supportive framework  
18 for third-party DCFC deployment.

19 Additionally, state programs, such as the Partnership to Plug-in, administered by the NJ  
20 Department of Environment Protection (DEP) are exemplar private-public partnerships to  
21 drive EV charging growth and support market transformation in the New Jersey electric vehicle  
22 charging space.



1 **Q. WHAT IS ACE PROPOSING WITH REGARDS TO THE DEVELOPMENT OF**  
2 **UTILITY-OWNED DCFC IN ITS SERVICE TERRITORY UNDER**  
3 **OFFERING 7?**

4 A. ACE's Offering 7 proposes that ACE, the Electric Distribution Company ("EDC")  
5 "install up to 45 DCFCs for public use at an estimated 15 locations along main transportation  
6 corridors in ACE's service territory". ACE asserts that under Offering 7, "ACE will target  
7 locations that serve local and long-distance travelers in the State, reducing range anxiety, and  
8 would provide additional charging solutions for PIV drivers that lack access to home  
9 charging." Further the company states that "to identify appropriate locations, the Company  
10 will examine the density of PIV ownership in ACE's service territory, and consider the  
11 locations of the major roadways and other pertinent characteristics, to provide the maximum  
12 opportunity for use and convenience of PIV drivers. The Company also intends to "target  
13 underserved areas under this Offering, such as [low and middle income (LMI)] and  
14 [Environmental Justice (EJ)] communities". Regarding specific sites, ACE intends to target  
15 government-owned properties for DCFC installation, but the Company will also consider  
16 commercially-owned properties where the subject chargers would be available at all times to  
17 PIV drivers."

18 In response to discovery question S-APIV-20, ACE further explains that "on a macro  
19 level, ACE will coordinate with State and local government agencies to determine which areas  
20 to target in the Company's service territory for [electric vehicle supply equipment (EVSE)].  
21 ACE will also consider the New Jersey Partnership to Plug-In's mapping for strategic  
22 placement of EV charging infrastructure when siting EVSE". In addition, "on a micro level,  
23 ACE will consider several factors when determining where to site Level 2 stations and DCFC,  
24 including, but not limited to: ensuring compliance with applicable law, the location, purpose

1 and accessibility of the site, the sites proximity to ACE's electric service, the amount of space  
2 available for equipment installation, etc. the proximity of amenities to the site, the proximity  
3 to major roadways, the proximity of other publicly available EV charging stations, ensuring  
4 geographic distribution of EVSE, particularly in areas currently underserved by publicly  
5 available charging stations, the potential for further reductions in emissions in the nearby  
6 vicinity, and the potential for increased utilization in the public transportation sector."

7 **Q. ARE THE ACTIVITIES DESCRIBED ABOVE COMPLEMENTARY TO**  
8 **THOSE OF THIRD-PARTY OWNER-OPERATORS OF DCFC?**

9 A. The activities and efforts described above are the type of activities and work that third-  
10 party owner-operators are already undertaking in the assessment and development of fast  
11 charging across New Jersey. By targeting "transportation corridors", "major roadways", and  
12 locations "in proximity to amenities", the utility is proposing the development of a network  
13 that would be redundant to and in direct competition with the private sector. Owner-operators  
14 of DCFC, like EVgo have sophisticated tools and models developed with over a decade of  
15 experience in EV charging development. Such tools in conjunction with engagements with site  
16 hosts are utilized in network planning efforts to assess where maximum opportunity for use of  
17 DCFC and convenience for BEV drivers may exist.

18 Further, the Company states that it "also intends to target underserved areas in  
19 ACE's service territory under [Offering 7: utility owned DCFC], such as LMI and EJ  
20 communities."<sup>9</sup> EVgo supports Electric for All and an equitable access to, and distribution of  
21 electric transportation.

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<sup>9</sup> Para 37, page 16, Petition.

EVgo continues to work to advance and advocate for greater equity in transportation electrification, and our network planning efforts consider density not community income levels, as a key factor in siting DCFC. Further, recent data from the California Energy Commission found no correlation between DCFC distribution across that state and income<sup>10</sup> and in fact, 40% of EVgo deployments in California are in low income areas<sup>11</sup>. Most, if not all, California EV charging programs have requirements for a minimum percentage deployment in disadvantaged communities. At the same time, the California Public Utilities Commission encourages DCFC growth through make-ready programs<sup>12</sup>, not through utility owned and operated DCFC.

Regarding specific sites, ACE intends to “target government-owned properties for DCFC installation, but the Company will also consider commercially-owned properties where the subject chargers would be available at all times to PIV drivers.” It appears that this allocation and customer segmentation is rather arbitrary. The type of property ownership (commercial or government) is not necessarily a determinant of where maximum use of DCFC and convenience for BEV drivers may exist or what attract more private sector owner-operators of DCFC.

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<sup>10</sup> CA PUC Docket Number 20-TRAN-02 SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment. Presentation on 6/4/2020, at pp. 16-22. Available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=233310&DocumentContentId=65800>

<sup>11</sup> Settlement Year 7 – Final Report. Progress Report to California Public Utilities Commission Electric Vehicle Charging Station Project (2019), p.3. For the period Jan 1, 2019 through September 5, 2019 (the Reporting Period) Submitted September 5, 2019 by NRG Energy, Inc. on behalf of the Dynegy Parties

<sup>12</sup> PG&E EV Fast Charge Program: [https://www.pge.com/en\\_US/large-business/solar-and-vehicles/clean-vehicles/ev-charge-network/ev-fast-charge.page?#:~:text=In%20the%20EV%20Fast%20Charge,number%20of%20competitively%20selected%20sites;Application of Southern California Edison Company \(U338E\) for Approval of its Charge Ready 2 Infrastructure and Market Education Programs, CA PUC Application 18-06-015, Decision \(September 2, 2020\) https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M346/K230/346230115.PDF](https://www.pge.com/en_US/large-business/solar-and-vehicles/clean-vehicles/ev-charge-network/ev-fast-charge.page?#:~:text=In%20the%20EV%20Fast%20Charge,number%20of%20competitively%20selected%20sites;Application%20of%20Southern%20California%20Edison%20Company%20(U338E)%20for%20Approval%20of%20its%20Charge%20Ready%20Infrastructure%20and%20Market%20Education%20Programs,CA%20PUC%20Application%2018-06-015,Decision%20(September%202,%202020)%20https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M346/K230/346230115.PDF)

1 **Q. WHAT POTENTIAL CHALLENGES DOES EVgo FORESEE WITH**  
2 **RESPECT TO THE ROLE OF THE UTILITY IN DEVELOPING DC FAST**  
3 **CHARGING INFRASTRUCTURE?**

4 A. Under the owner-operator model<sup>13</sup>, providers like EVgo are aligned with consumers'  
5 interests as usage of its charging network is the primary source of revenue. Accordingly, the  
6 owner-operator is motivated to maintain maximum uptime and reliability to serve the  
7 customers needing reliable and convenient charging. For these reasons, EVgo builds mostly in  
8 metro and suburban areas where charger usage is typically much higher given BEV density,  
9 traffic patterns, a preponderance of residents of MUDs that do not have access to home  
10 charging<sup>14</sup>, and other factors.

11 One potential challenge with a utility owned and operated DC fast charging network in  
12 close proximity to a third-party operator's network is that the utility may consume the usage  
13 that the competitive market relies on to sustain its economics. If a third-party operator like  
14 EVgo does not see adequate usage to sustain its network, the lower usage will discourage future  
15 private sector investments. For these reasons, as EVgo prioritizes its investments, it may  
16 deploy fewer charging stations in places where utility-ownership is prevalent.

17 Another challenge with utility owned and operated DC fast charging stations is that the  
18 utility may set its public pricing at rates too low for the private market to compete. This could  
19 also undercut competition and impact usage of third-party networks.

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<sup>13</sup> The owner/operator model is responsible for close to three quarters of charging stations. US Department of Energy, Alternative Fuels Data Center July 2020 Data;  
[https://afdc.energy.gov/stations/#/analyze?country=US&fuel=ELEC&ev\\_levels=dc\\_fast](https://afdc.energy.gov/stations/#/analyze?country=US&fuel=ELEC&ev_levels=dc_fast)

<sup>14</sup> International Council on Clean Transportation, *Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets* (January 2019), p. 9,  
[https://theicct.org/sites/default/files/publications/US\\_charging\\_Gap\\_20190124.pdf](https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf)

1 **Q. CAN ACE GAIN INSIGHT INTO THE IMPACT OF DCFCs ON THE GRID**  
2 **WITHOUT NECESSARILY OWNING AND OPERATING ITSELF FAST**  
3 **CHARGERS AS IS CONTEMPLATED BY OFFERING 7?**

4 A. In its initial petition, ACE presents that “deployment of DCFC under Offering 7 will  
5 also provide ACE with insight into the impact of DCFCs on the grid, as well as usage pattern  
6 data, and further enable ACE to evaluate the benefits of distribution storage while reducing the  
7 impact of demand charges”.

8 EVgo disagrees with the suggestion that to gain insight into the impact of fast charging  
9 on the distribution grid, ACE must own its DCFC stations. First, information about its own  
10 grid is readily available to the EDC through its own grid monitoring mechanisms, functions  
11 and or tools. The utility’s meters can also provide useful data and insight into its customers.  
12 Second, typically, the development and deployment cycle of third-party owned and operated  
13 fast chargers would involve the utility, through the interconnection review and approval  
14 process. Third, the majority of EV drivers still charge at home in the evening, and DCFC is  
15 still a small portion of charging that occur on the electric grid. The National Renewable Energy  
16 Laboratory has published reports examining and modeling light-duty vehicle charging loads<sup>15</sup>,  
17 which could inform where the EDC may want to direct its efforts initially at least with respect  
18 to grid impact.

19 By way of comparison, a typical DCFC station installed by EVgo might have a possible peak  
20 coincident load of somewhere between 100 kW and 500 kW, roughly in line with a  
21 neighborhood store or a supermarket (respectively). ACE does not propose that future

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<sup>15</sup> Massachusetts - <https://www.nrel.gov/docs/fy17osti/67436.pdf> ; Maryland  
<https://www.nrel.gov/docs/fy17osti/67436.pdf>

1 grocery store developments would require specific grid monitoring and protection or would  
2 need to address specific grid planning and operational needs?

3 The BPU could explore developing a set of metrics and data reporting mechanisms that would  
4 be provided by all participants of approved programs, informing charging behavior, types of  
5 charging and other relevant metrics. This could be achieved at specific points in time once the  
6 EV programs have had sufficient chance to ramp up.

7 **Q. WHAT IS ACE PROPOSING FOR OFFERING 9, THIRD-PARTY OWNED**  
8 **DCFC?**

9 A. Offering 9 consists of two parts:

10 “(1) an off-bill demand charge incentive for private, competitive, non-utility  
11 owner/operators of publicly available DCFCs; and  
12 (2) a “make-ready” work incentive, where the Company would perform the electrical  
13 upgrades and work up to the point of the charger connection, at no direct cost to the  
14 non-utility owner/operator of the DCFC.”

15 In its petition, ACE contemplates making available Offering 9 to “up to 30 locations  
16 within ACE’s service territory, where each location could support up to 4 chargers (such that  
17 the Offering would cover up to a maximum of 120 chargers, in aggregate).”

18 **Q. DOES EVgo SUPPORT THE MAKE-READY PROGRAM ACE PROPOSES?**

19 A. As a framework, EVgo supports ACE’s make-ready program. In the U.S., the  
20 owner/operator model is responsible for close to three quarters of DCFC stations<sup>16</sup> and so

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<sup>16</sup> US Department of Energy, Alternative Fuels Data Center July 2020 Data;  
[https://afdc.energy.gov/stations/#/analyze?country=US&fuel=ELEC&ev\\_levels=dc\\_fast](https://afdc.energy.gov/stations/#/analyze?country=US&fuel=ELEC&ev_levels=dc_fast).

1 make-ready (when combined with the appropriate EV tariff) would continue to support the  
2 competitive DCFC market.

3 Indeed, utility make-ready investments or line extension policies support the  
4 economics of siting DCFC by bringing rate-based distribution upgrades into the utility scope  
5 while leaving dispenser ownership, marketing, customer service, and charging network  
6 operation in the hands of experienced private operators. Across the country, commissions have  
7 approved proposals for utility make-ready infrastructure investments to support the  
8 competitive charging ecosystem. Most recently in New York, the Public Service Commission  
9 approved a \$700M state-wide make-ready program for all investor-owned utilities in the state  
10 to help bolster the development of charging infrastructure to meet state ZEV goals<sup>17</sup>.

11 If designed correctly, the make-ready model could also be an important first step for  
12 addressing equity concerns. EVgo believes equitable outcomes can be achieved through  
13 effective program design that prioritizes disadvantaged, LMI or EJ communities or “Equity  
14 Areas” (per the term used in the Straw Proposal), in proposals or site applications. For example,  
15 in California, Pacific Gas & Electric was allocated \$22.4MM for a make-ready DCFC  
16 program. The program has a goal to support 234 DCFC and has a stated requirement for a  
17 percentage of deployments to occur in disadvantaged communities. Site hosts – which are  
18 defined as the customer of record on the utility bill – may receive an additional rebate for  
19 installations in disadvantaged communities to help mitigate the high upfront capital costs of  
20 DCFC.

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<sup>17</sup> Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs; July 16, 2020. NY PSC CASE 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure

1 It is not clear however, why the Company chose to limit “eligible locations for the  
2 DCFCs under this Offering [...] to commercially-owned property”<sup>18</sup>. This delineation would  
3 limit private sector participation and seems to add a criterion that should not factor in as to  
4 where DCFC is most needed or should be encouraged.

5 Finally, the make-ready model is not only consistent with the approach being taken by  
6 other utilities and public service but also aligns with the “shared responsibility” model  
7 presented in the Straw Proposal.

8 **Q. WHAT IS EVgo’s RECOMMENDATION**

9 A. EVgo’s recommendation is that third-party owner-operators of DCFC should first be  
10 provided sufficient unencumbered opportunity to lead in the development of the DCFC  
11 network, both through a make-ready program offered by the EDC, in combination with an  
12 appropriate tariff structure, as well as other charging infrastructure programs being  
13 administered by New Jersey Department of Environmental Protection. This would support a  
14 “Shared Responsibility” approach.

15 **Q. ARE THERE ADDITIONAL ELEMENTS EVgo WISHES TO DISCUSS?**

16 A. Yes. A complete EV program needs to address both the EV related infrastructure and  
17 rate reform in a holistic manner and not have one part of the program working against the other.  
18 Given the short timeline to meet the objectives of the PIV act, EVgo submits that a better way  
19 to ensure rate reform is successful and sustainable is to leverage existing rate designs that have  
20 been approved and are underway across many utility service territories, and which are simple  
21 in design and implementation. Such tariff structures that seek to minimize demand charges, in

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<sup>18</sup> ACE petition, Page 19



1 favor of volumetric charges and are applied to both existing and new DCFC investments offer  
2 significant market development potential. Such structures have been developed under  
3 commercial EV rates and low-load factor rates, for example Eversource's EV rider in  
4 Connecticut and Dominion's Virginia SG-2 rate schedule<sup>19</sup>. EVgo witness Tom Beach  
5 presented rate design testimony that discusses this topic in further detail in the PSEG CEF-  
6 EVES proceeding<sup>20</sup>, which is running in a parallel schedule.

7 **Q. DOES THIS COMPLETE YOUR TESTIMONY?**

8 **A. Yes.**

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<sup>19</sup> See <https://www.eversource.com/content/docs/default-source/rates-tariffs/rider-ev.pdf>. This rate rider was approved in the Connecticut Public Utilities Regulatory Authority's decision in Docket No. 13-12-11, dated June 4, 2014. See Virginia Electric and Power Company, Schedule GS-2. <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/business-rates/schedule-gs2.pdf?la=en&rev=ca651fa03bb44ed4acf86a71547ba786&hash=6EF6530D86014E12AB2986EFCDD0FDA9B>

<sup>20</sup> Direct Testimony of R. Thomas Beach on behalf of EVgo Services LLC. September 4, 2020. BPU Docket No. EO18101111