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June 7, 2021

Via Email
Hon. Steven K. Haas
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building – 2nd Floor
400 North Street
Harrisburg, PA 17120
sthaas@pa.gov

Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Electric Division;
Docket No. R-2021-3023618

Dear Judge Haas:

Enclosed please find the Revised Direct and Rebuttal Testimony of Danita Park (Statement Nos. 2 and 1-R) on behalf of the Retail Energy Supply Association and NRG Energy, Inc. with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Sarah C. Stoner

Sarah C. Stoner

Enclosure

cc: Rosemary Chiavetta, w/COS only
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing document upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: June 7, 2021

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Sarah C. Stoner, Esquire

Attorney for RESA and NRG Energy, Inc.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DIRECT TESTIMONY OF

DANITA PARK

ON BEHALF OF THE
RETAIL ENERGY SUPPLY ASSOCIATION
AND NRG ENERGY, INC.

Docket No. R-2021-3023618

UGI Utilities, Inc. – Electric Division
2021 Base Rate Proceeding

TOPIC:

Electric Vehicle Program

May 3, 2021

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Exhibit DP-1	UGI Electric Response to RESA and NRG Set I, No. 17
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Exhibit DP-5	UGI Electric Response to RESA and NRG Set I, No. 27

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME.

A. Danita Park.

Q. PLEASE STATE YOUR CURRENT EMPLOYER AND TITLE.

A. I am employed by NRG Energy, Inc. ("NRG") and serve as Director, Electric Vehicle and Commercial Development.

Q. WHAT ARE YOUR VARIOUS JOB RESPONSIBILITIES?

A. I create new lines of business to support NRG's commercial and industrial customers. In this role, I supported the creation of a business to advise Virtual Power Purchase Agreements. I also am spearheading an effort to set an Electric Vehicle fleet conversion target for NRG Energy.

Q. WHAT IS YOUR BUSINESS ADDRESS?

A. 910 Louisiana Street, Houston, TX 77002.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

I hold a Bachelor of Science in Biochemistry and a Masters in Business Administration, Finance both from the University of Calgary in Calgary, Alberta, Canada. I began my career in the energy industry in 1998 as an equity analyst with Arc Financial in Calgary, Canada. In that role, I analyzed oil and gas service companies (horizontal drilling, drilling tools, cementing companies, for example) and made recommendations for investment.

I joined Dynegy Inc. in 2000 where I worked on the deployment of a front, mid and back office natural gas trading systems. I held several roles in the wholesale power organization including risk management, business management, and asset management, and led the real-time power trading desk. My key roles involved analyzing portfolio risk,

modeling and budgeting the value of power generation assets, modeling and trading capacity markets, and modeling and trading real time power.

I joined Calpine Corporation ("Calpine") in 2006 where I worked in fundamental analysis and portfolio analysis with similar responsibilities as at Dynegy. I managed the due diligence process for Calpine's acquisition of Conectiv Energy, a $1.65 billion acquisition, and led the wholesale asset integration.

In 2012, I joined NRG as Director Asset Management, East Region. My primary responsibility in this role was to manage each power plant as a business. I was responsible for the overall financial performance of the asset and worked cross functionally with teams from tax, insurance, trading, plant operations, legal, environmental, governmental affairs, and regulatory affairs to ensure the full value of each asset was achieved.

In 2018, I joined NRG Business Solutions (now NRG Business) in the role of Director, Commercial Development. In this role I participated as a panelist at the Renewable Energy Markets Conference in Houston, Texas and spoke on the topic of building resilient business operations. In 2019, I was appointed to our electric vehicle task force. Today my role has been expanded to Director, Electric Vehicle and Commercial Development.

Q. HAVE YOU EVER PROVIDED TESTIMONY BEFORE THIS COMMISSION?

A. I have not.

Q. HAVE YOU PROVIDED TESTIMONY IN UTILITY PROCEEDINGS IN OTHER STATES?

A. I have not.

II. OVERVIEW AND SCOPE OF TESTIMONY

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of the Retail Energy Supply Association ("RESA") and NRG Energy, Inc. ("NRG").

Q. PLEASE DESCRIBE THE RETAIL ENERGY SUPPLY ASSOCIATION.

A. Retail Energy Supply Association ("RESA") is a trade association of energy companies including Pennsylvania licensed electric generation suppliers ("EGSs"), many of whom either offer or have relationships with third party providers that develop and offer electric storage options and/or electric vehicle charging infrastructure.[1]

Q. PLEASE DESCRIBE NRG ENERGY, INC.

A. NRG is a leading integrated power company built on dynamic retail brands and diverse generation assets. A Fortune 500 company, NRG brings the power of energy to consumers by producing, selling and delivering electricity and related products and services to consumers in competitive markets across the U.S. and Canada, as well as 23,000 MW of electric power generation including nuclear, coal, gas, oil and solar nationwide. NRG's retail brands serve more than six million customers across North America, including a significant share in Pennsylvania – so significant, in fact, that NRG's northeast retail business is headquartered in Philadelphia. We have several licensed retail electricity suppliers that are actively serving residential, commercial,

[1] The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

industrial and institutional customers.[2] NRG's retail companies offer customers a range of products including demand response and energy efficiency, 100% renewable energy, energy plans bundled with energy efficiency technology, such as Nest or Hive thermostats, as well as loyalty rewards and our charitable giving products through our "Choose to Give" plans.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to address UGI Utilities, Inc. – Electric Division's ("UGI Electric" or "Company") proposed Electric Vehicle ("EV") Program. In addressing the Company's proposed EV Program, I will discuss the Direct Testimony of UGI Electric witnesses Eric W. Sorber and John D. Taylor. In my testimony, I describe the positions of RESA and NRG with respect to issues raised by UGI Electric's electric vehicle proposal.

RESA and NRG support the general policy objective of UGI Electric to promote EV charging infrastructure and customer education in the Company's service territory. However, they generally oppose the EV Program through which UGI Electric seeks to own and operate EV charging stations outside of the competitive market. RESA and NRG also oppose UGI Electric's proposal to invest in make-ready infrastructure. Monopoly utility investment in EV transportation infrastructure should be limited to the rare circumstance where customer demand is unmet and/or private investment is

[2] NRG's license retail supply companies include: Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business A-2010-2192350; Green Mountain Energy Company A-2011-2229050; Energy Plus Holdings LLC A-2009-2139745; XOOM Energy New Jersey, LLC A-2012-2283821; Stream Energy New Jersey, LLC A-2010-2181867; Direct Energy Services, LLC A-110164; Direct Energy Business, LLC A-110025; Direct Energy Business Marketing, LLC A-2013-2368464; and Gateway Energy Services Corporation A-2009-2137275.

uneconomic. It is premature to determine that either of these situations present today in UGI Electric's service territory.

Beyond the aforementioned policy positions, I will demonstrate that UGI Electric's proposed EV Program does not reflect the reality of EV consumer behavior, the current competitive market for charging infrastructure, and the observed and reported factual need for public charging. I will demonstrate that the forces of the competitive market are attracting both private stakeholders willing to take on the risk and a wide range of competitive companies innovating to deliver the required EV charging infrastructure ahead of EV adoption.

Q. ARE YOU SPONSORING ANY EXHIBITS?

A. Yes. The exhibits enclosed with my testimony are various discovery responses served in this proceeding.

Q. DO YOU HAVE ANY PERSONAL EXPERIENCE WITH ELECTRIC VEHICLES?

A. Yes. I bought my first electric vehicle in 2016.[3] I have charged my vehicle at work, at home, at private charging networks, and public charging. I own a Tesla with a maximum range of 240 miles and an operating range of 210 miles. I currently charge at home, in my garage using a wall plug (120V) and the charger supplied with my vehicle.

Q. IS THERE ANY JUSTIFICATION FOR UGI ELECTRIC TO OWN OR OPERATE ELECTRIC VEHICLE CHARGING INFRASTRUCTURE?

A. No. As I discuss below, the market forces have clearly demonstrated – across all of the States, including Pennsylvania – that the competitive companies are anticipating and

[3] NRG Energy, Inc., Insights - *When the car you want is a rainbow-colored unicorn,* published April 28, 2021 by Danita Park, available at https://www.nrg.com/insights/energy-education/when-the-car-you-want-is-a-rainbow-colored-unicorn.html?sid=GSM-IG-2021April-DanitaParkEVBlog2Hybrids

responding to Electric Vehicle adoption, and indeed even over-supply DC fast capability by orders of magnitude over demonstrated need.

There is simply no need for Utility intervention in this clearly competitive market. UGI Electric has failed in all regards to demonstrate any need for electric vehicle charging. As I discuss below, private entities ranging from electric vehicle charging companies to auto makers to traditional fossil fuel suppliers are using their own funds to build the required infrastructure to meet customer demand.

Q. SHOULD UGI ELECTRIC INVEST IN CHARGING INFRASTRUCTURE OR MAKE READY SITES?

A. No. As explained below, the market is already exceeding demand for fast charging. UGI Electric has failed to demonstrate any true need. UGI Electric has failed to accurately describe the market forces or consumer behavior in the space. Providing UGI Electric with ratepayer funds to build out three new DC charging stations will contribute to the over build of electric vehicle infrastructure, and waste ratepayer dollars. Private entities are both willing and able to make these investments and should be allowed to do so unencumbered by utility interference.

Q. WHAT ARE YOUR PRIMARY CONCERNS WITH UGI ELECTRIC'S PROPOSED EV PROGRAM?

A. We have a few of concerns. First, allowing the monopoly utility to interfere in the competitive market using ratepayer dollars has the potential to disincentivize private investment in this space. Regulated utilities have the unique advantage of guaranteed cost recovery that private companies do not enjoy, thus creating an uneven playing field when regulated entities are permitted to participate in the competitive market. Second, allowing UGI Electric to invest in EV infrastructure puts investment risk on ratepayers, rather than where it rightly belongs – with the shareholders of private companies.

Importantly, there is simply no need for utility-owned and operated investment. UGI Electric's proposal is built on misconceptions about EV charging needs and represents a 20th century solution to a 21st century problem.

Q. DO YOU HAVE RECOMMENDATIONS FOR THE COMMISSION TO CONSIDER?

A. Yes. I recommend that the Commission reject UGI Electric's request to construct and own three DC fast charging stations and invest in make-ready infrastructure. I also recommend that UGI Electric's EV Program focus on customer education aimed at correcting the consumer misconceptions that serve as a barrier to EV adoption.

III. ELECTRIC VEHICLE MARKET

Q. DO YOU BASE YOUR POLICY RECOMMENDATIONS ON UGI ELECTRIC'S EV CHARGING PROPOSALS ON REAL WORLD EXPERIENCE AND KNOWLEDGE ABOUT WHAT IS OCCURRING IN THE EV CHARGING MARKET TODAY?

A. Yes, and in the remainder of my testimony, I will elaborate on that experience and knowledge. I will highlight common misconceptions, actual consumer driving behavior, driving distances, and charging needs. I also will call attention to the dynamic and rapidly growing market that is attracting investment from energy, technology and automotive players all willing to risk their own capital to meet the anticipated EV adoption growth.

Q. HOW MANY ELECTRIC VEHICLES HAVE BEEN SOLD IN THE UNITED STATES SINCE 2010?

A. Between January 1, 2010 and March 31, 2021, the number of plug-in electric and all-electric battery powered vehicles sold in the United States is 1,818,473.[4]

[4] Argonne National Laboratory, *Light Duty Electric Drive Vehicles Monthly Sales Updates*, see https://www.anl.gov/es/light-duty-electric-drive-vehicles-monthly-sales-updates

Q. WHAT PERCENTAGE OF ELECRIC VEHICLE OWNERS CHARGE AT HOME?

A. More than 80% of charging occurs at home.[5]

Q. WHAT IS THE TYPICAL DRIVING EXPERIENCE FOR AMERICANS?

A. The average American drives 31.5 miles each day and spends 51 minutes driving while taking an average of 2.2 trips per day.[6]

Q. WHAT ARE THE THREE MOST COMMON MISCONCEPTIONS REGARDING ELECTRIC VEHICLES IN YOUR EXPERIENCE?

A. There are at least three misconceptions that serve as key barriers to EV adoption and, arguably, are holding back potential EV owners from making their next vehicle an electric one. The fact that less than 2% of residents in the Commonwealth have moved to EV ownership is evidence of the strength of these misconceptions and the need for better and more consumer education.

The first misconception involves consumer perceptions of EV charging needs. It is quite common (and wrong) to assume that EV owners will charge their electric vehicle in the same way they fuel a fossil fuel vehicle – i.e., at a third-party gas station. The only frame of reference consumers have about EV fueling needs is their experience with fueling their gas or diesel vehicles. Homeownership in Pennsylvania is nearly 70%;[7] the first choice for any new electric vehicle owner to charge their vehicle will be at home. Customer education is key to informing consumers about how EV fueling is quite different than fossil fuel vehicle needs.

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5 U.S. DOE Office of Energy Efficiency & Renewable Energy, Electric Vehicles, see https://www.energy.gov/eere/electricvehicles/charging-home

6 AAA Foundation for Traffic Safety, *American Driving Survey, 2014 – 2017*, see http://aaafoundation.org/wp-content/uploads/2019/02/18-0783_AAAFTS-ADS-Brief_r8.pdf

7 United States Census Bureau, QuickFacts Pennsylvania, see https://www.census.gov/quickfacts/fact/table/PA/BZA010219

The second misconception involves perceptions about EV battery range – often referred to as range anxiety. This perception is unfounded. Auto manufacturers are delivering more models with vehicle battery range exceeding 200 miles. As noted previously, in the United States, the average daily trip is 31 miles, nearly a week's worth of driving can occur on a single charge with a vehicle that has 200 miles of range. This misconception presents another opportunity for customer education.

The third most common misconception is about the amount of infrastructure required to support EV adoption. With an average daily driving range of 31 miles, the amount of charging required to meet the typical customer's mileage needs can be met with overnight recharging (i.e., 6-8 hours) using a 120V plug or using a level 2 charger in about 1.5 hours. Both charging methods are commonly deployed at home and work. Few consumers realize that they do not need DC fast charging, save for a few limited times over the course of 15,000 miles of driving.

Q. ARE THERE ANY REPORTS AVAILABLE THAT DESCRIBE CONSUMER CHARGING BEHAVIOR AND RELIANCE ON FAST CHARGING?

A. Yes. Consumer Reports, a trusted source of information for millions of consumers across the country, published a report in October 2020 on EV ownership which debunks these and other common consumer misconceptions.[8]

Q. WHAT IS THE ESTIMATED NUMBER OF CHARGING PORTS PER 1,000 ELECTRIC VEHICLES?

A. The National Renewable Energy Laboratory ("NREL") has estimated a need for 27,500 DC electric vehicle ports and 601,000 level 2 ports, based on a scenario where there are

[8] *Electric Vehicle Ownership Costs: Today's Electric Vehicles Offer Big Savings for Consumers*, Harto, Chris, October 2020, https://advocacy.consumerreports.org/wp-content/uploads/2020/10/EV-Ownership-Cost-Final-Report-1.pdf.

15 million light duty plug in vehicles on the roads.[9] The implied rate of charging required to support EV adoption is 1.8 DC fast charging ports per 1000 vehicles and 40.1 level 2 ports per 1,000 vehicles.

Q. HOW MANY ELECTRIC VEHICLES DOES THE EXISTING PENNSYLVANIA ELECTRIC VEHICLE CHARGING INFRASTRUCTURE SUPPORT?

A. According to the refreshed Pennsylvania Road Map for Electric Charging there are 324 DC Fast Chargers, enough to support 180,000 vehicles; and 1,596 Level 2 chargers – enough to support 39,800 vehicles.[10]

Q. BASED ON THE ACTUAL NUMBER OF REGISTERED VEHICLES IN PENNSYLVANIA (32,019) HOW MANY DC FAST CHARGERS AND LEVEL 2 CHARGERS ARE REQUIRED?[11]

A. Based on the guidance provided by NREL (noted above), Pennsylvania's statewide estimated DC fast charging need is 57 units, while its estimated Level 2 charging need is 1,283 units.

Q. BASED ON THE NREL ESTIMATE OF CHARGING NEED AND THE ACTUAL REPORTED NUMBER OF CHARGING PORTS DISCLOSED IN THE UPDATED ROADMAP, IS THERE AN OVERBUILD OF CHARGING CAPACITY IN PENNSYLVANIA?

A. Yes. There are 267 more DC fast ports and 313 Level 2 charging ports than are necessary to support the electric vehicles in Pennsylvania.

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[9] *National Plug-In Electric Vehicle Infrastructure Analysis*, U.S. DOE, Office of Energy Efficiency & Renewable Energy, September 2017, see https://www.nrel.gov/docs/fy17osti/69031.pdf

[10] Pennsylvania Electric Vehicle Roadmap: 2021 Update, Pennsylvania Department of Environmental Protection, see https://files.dep.state.pa.us/Energy/OfficeofPollutionPrevention/StateEnergyProgram/PAElectricVehRoadmapBookletDEP5334.pdf

[11] Alliance for Automotive Innovation, as of 4/25/2021; filtered for PA; see https://www.autosinnovate.org/resources/electric-vehicle-sales-dashboard.

Q. IS THE OVER BUILD OF CHARGING INFRASTRUCTURE IN PENNSYLVANIA CONSISTENT WITH OTHER STUDIES?

A. Yes. In the second quarter of 2020, NREL estimates that in the United States there are more charging ports than required for the number of registered electric vehicles: 14,551 DC fast charge ports – enough to serve 8.1 million electric vehicles, and 74,238 Level 2 charge ports – enough to serve 1.8 million electric vehicles.

Q. IS UGI ELECTRIC'S CLAIM THAT THERE ARE NO CHARGING PORTS IN THEIR SERVICE TERRITORY REASON ENOUGH TO JUSTIFY OVERBUILDING FAST CHARGING IN THEIR SERVICE TERRITORY?

A. No. UGI Electric's claim that there is no charging infrastructure alone is an insufficient demonstration of need. Nor has UGI Electric demonstrated that any investment will be utilized sufficiently to warrant investment. As a practical matter, it is important to understand that utility service territories have no relationship to transportation needs, highways or the ideal locations for DC fast charging. UGI Electric is solely focused on investments they can make in their footprint. The transportation needs inside a single utility service territory is an inherently poor criteria for determining the location for any vehicle charging infrastructure and wholly insufficient to justify ratepayer investment.

Q. CAN YOU PROVIDE ANY EXAMPLES OF COMPETITIVE BUSINESSES THAT BUILD, OWN, AND/OR OPERATE ELECTRIC VEHICLE CHARGING INFRASTRUCTURE?

A. Yes, there are many well-established, well-capitalized businesses in this space including: Blink,[12] Volta,[13] EVgo,[14] and Electrify America.[15] These companies are deploying their

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[12] *Electric Vehicle Charging Stations, Blink Charging Solutions*, see https://blinkcharging-dev.azurewebsites.net/wp-content/uploads/2020/04/1.3_BlinkOverview.pdf

[13] *Vola Investor Relations*, see https://voltacharging.com/investor-relations/

[14] *EVgo Fast Charging, EVgo Investor Relations*, see https://www.evgo.com/investors/

[15] *Electrify America, Our Investment Plan*, see https://www.electrifyamerica.com/our-plan/

own capital to build and often own electric charging infrastructure in the United States. Electrify America, alone, has a commitment to spend $1.2 Billion dollars in States other than California to build charging infrastructure, as part of the Volkswagen diesel emissions settlement.

Q. ARE AUTOMAKERS SUPPORTING THE BUILD OUT OF ELECTRIC CHARGING INFRASTRUCTURE?

A. Yes. Automakers are directly supporting the build out of electric charging infrastructure. They are doing this by building their own private networks and by supporting the build out of existing public networks. The following are just a few examples of a subset of automakers and their current and announced networks of electric charging infrastructure.

- Tesla, with 79% market share of the electric vehicle market has built an extensive private network to support their consumers and currently provides nearly 60% of all DC fast charging ports in the country.[16]
- Rivian is a new auto maker producing the R1T, R1S and supplying Amazon with 100,000 commercial vans. They have announced plans to build a network of 3,500 DC fast chargers at over 600 sites by 2023 including many sites in Pennsylvania.[17]
- Ford announced a network of 12,000 charging stations to support their growing electric vehicle line up.[18]

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[16] Electrek, *Tesla owns 79% of the electric car market in the US, and that needs to change,* dated February 16, 2021 see https://electrek.co/2021/02/16/tesla-owns-electric-car-market-us/#:~:text=Tesla%20owns%20almost%2079%25%20of,the%20US'%20electric%20car%20market, and NREL, *Electric Vehicle Charging Infrastructure Trends from the Alternative Fueling Station Locator: Second Quarter 2020,* dated January 2021, see https://www.nrel.gov/docs/fy21osti/78486.pdf

[17] Rivian – Charging Your Rivian, see https://stories.rivian.com/charging-your-rivian

[18] Electrek – *Ford announces plans for EV charging, partners with Amazon and Greenlots*, dated October 17, 2019, see https://electrek.co/2019/10/17/ford-charging-electric-cars-partners-amazon-greenlots/

- General Motors (GM) is investing in 2,700 new DC Fast Chargers on EVgo's network. EVgo's network is currently over 800 Fast Chargers.[19]
- Jeep is partnering with Electrify America to put chargers at trail heads.[20]
- Volkswagen in 2016 created Electrify America as part of the Volkswagen diesel settlement with a commitment to invest $2 billion in electric vehicle infrastructure, including $1.2 billion outside of California. Cycle 2 investment is currently underway. Cycle 3 is in the planning phase. Public comment and requests for siting is allowed and the most recent planning Cycle 3 accepted comments through August 14, 2020.

Q. HOW ARE THE TYPICAL SUPPLIERS OF FOSSIL FUEL RESPONDING TO THE NASCENT ADOPTION OF ELECTRIC VEHICLES?

A. Typical suppliers of gasoline and diesel are adapting to the anticipated EV charging demand by deploying electric vehicle charging infrastructure, as well. Recent examples include: Wawa, which hosts 35 Electric Charging stations to date and opened its first EV only charging station in Virginia; Royal Dutch Shell, which has announced plans to deploy 500,000 charging points globally by 2025; Chevron, which announced investment in a handful of retail charging sites and also holds investments in electric charging such as the one in ChargePoint through its new venture technology fund; and BP, which

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[19] *GM will help EVgo triple its fast charger network in the US* - The Verge, dated July 31, 2020, see https://www.theverge.com/2020/7/31/21349614/general-motors-evgo-fast-charging-network-investment

[20] *Jeep and Electrify America to put EV chargers at 4WD trailheads,* Joe Lorio, dated March 26, 2021, see https://autos.yahoo.com/jeep-electrify-america-put-ev-185800511.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAGb7j12f6sKS_Z9KoBt5ARInrLkT6PpmKLCIGaeNMjt46BV8kc7PE5LVsUMeHtgLkP5PitwRvWTSudRJCoIDsCPJLn1IerRzQP61GE73qki02owcMkMOigWUaTZdEEDtagjyZtWukLEz_DUF2uZpEDbkVRfVT2A7zP67FkEYfQNG

purchased an electric vehicle charging station in the UK, and in the US has backed start up FreeWire.

Q. WHAT IS THE CURRENT MARKET SHARE OF ELECTRIC VEHICLES IN PENNSYLVANIA?

A. According to The Alliance for Automotive Innovation, 32,019 electric vehicles have been sold in Pennsylvania since 2010, out of approximately 1,818,473 sold in the entire US over approximately the same time frame (or ~ 1.76%).

Q. HOW DOES EV ADOPTION IN UGI ELECTRIC'S SERVICE TERRITORY COMPARE TO EV ADOPTION IN THE REST OF THE COMMONWEALTH?

A. According to UGI, UGI Electric's service territory has seen much lower adoption of EVs than the rest of the Commonwealth. (UGI Electric Statement No. 6 at 34).

Q. IS IT REASONABLE FOR RATEPAYERS (IN A SMALL SERVICE TERRITORY) TO FUND THE DEPLOYMENT OF EV INFRASTRUCTURE?

A. No. UGI Electric's captive ratepayers should not bear the risk of utility investment in a market that is clearly competitive and benefiting from investment by numerous competitive companies, as noted above. The competitive market, and most importantly private shareholders, should take on the burden and risk of funding research and development of innovative products and services in this burgeoning market.

Q. DOES THE LOW EV ADOPTION RATE IN UGI ELECTRIC'S SERVICE TERRITORY SUGGEST THAT INVESTMENT IS NEEDED BY UGI ELECTRIC?

A. It does not. As I explained above, consumer driving behavior, actual EV charging needs, and the overall transportation infrastructure needs cannot be viewed through the telescope of a single electric utility service territory.

IV. UGI ELECTRIC'S ELECTRIC VEHICLE PROGRAM PROPOSAL

Q. PLEASE EXPLAIN UGI ELECTRIC'S PROPOSED ELECTRIC VEHICLE PROGRAM.

A. UGI Electric's proposed EV Program has three components. First, UGI Electric plans to install and own three EV charging stations. (UGI Electric Statement No. 3 at 29). Second, UGI Electric proposes to develop make-ready infrastructure to be used by third-party EV charging station operators. Third, UGI Electric proposes customer education and outreach on EVs. (UGI Electric Statement No. 6 at 36).

Q. DO YOU HAVE ANY CONCERNS WITH THE DESIGN OF UGI ELECTRIC'S PROPOSED EV PROGRAM?

A. Yes. UGI Electric has failed to demonstrate that there is any need for Utility investment, that there is any need for electric vehicle charging, and that there is any need for either DC Fast charging or Level 2 charging that the competitive market will not provide. UGI Electric has failed to acknowledge that 80% of charging occurs at home or at work, providing at best misleading testimony of need. In short, there is no need for the program aside from providing education that is coordinated with the PUC, UGI and interested third-party stakeholders.

Q. PLEASE DESCRIBE UGI ELECTRIC'S PROPOSAL TO INSTALL AND OWN THREE EV CHARGING STATIONS IN MORE DETAIL.

A. UGI Electric proposes to install and own three EV charging stations. UGI Electric proposes that each of the charging stations consist of one DC Fast Charge ("DCFC") charging station capable of charging a vehicle to approximately 80% of full charge within 30 minutes. Locations will also be evaluated for additional Level 2 charger installations capable of providing 20 miles of range per hour of charging time. (UGI Electric Statement No. 3 at 29). UGI Electric anticipates that each location will include two

Level 2 chargers. (see attached RESA/NRG Exhibit DP-1, UGI Electric Response to RESA and NRG Set I, No. 17). UGI Electric has identified three general locations along primary transportation corridors for the EV charging stations. (UGI Electric Statement No. 3 at 30).

Q. DOES UGI ELECTRIC INTEND TO PARTNER WITH A NETWORK PROVIDER?

A. Yes. The Company intends to install ChargePoint equipment and utilize its network services. Network services will be covered under an annual fee and will include the real-time monitoring and administration of the charging units including scheduled charging, analytics and reporting, pricing and automatic funds collection, energy management, driver support, and predictive maintenance and diagnosis. (see attached RESA/NRG Exhibit DP-2, UGI Electric Response to OSBA Set I, No. 21).

Q. IS UGI ELECTRIC PROPOSING ANY CHANGES TO ITS TARIFF?

A. Yes. The Company proposes a new Rate EV-C ("Electric Vehicle Company Owned Charging") to address Company-owned EV charging stations. The new Rate Schedule EV-C would set the maximum rate per kWh charged to EV operators at UGI-owned public EV charging stations at $0.50/kWh. (UGI Electric Statement No. 6 at 44).

Q. WILL UGI ELECTRIC OFFER TIME-OF-USE RATES?

A. UGI Electric anticipates that EV charging station pricing will be established based on prevailing market or standard pricing criteria. UGI Electric is working with ChargePoint to evaluate related pricing criteria and factors that may vary with time of use. (see attached RESA/NRG Exhibit DP-3, UGI Electric Response to RESA and NRG Set I, No. 12).

Q. WHAT IS THE ESTIMATED COST OF THE EV CHARGING STATION PROJECT?

A. The EV charging station project is included in the FY2022 capital budget at a total project cost of $300,000. (UGI Electric Statement No. 3 at 31). This cost is allocated in the allocated costs of service study based on the total customers in each rate class as a proportion of total customers. (UGI Electric Statement No. 6 at 42).

Q. DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC'S PROPOSAL TO OWN AND OPERATE EV CHARGING STATIONS?

A. Yes. As I noted above, based on NREL estimates of need and the current status of EV infrastructure buildout in Pennsylvania, the competitive market is not only meeting customer demand but has in fact built more than what is required based on current EV ownership. UGI Electric has failed to demonstrate any need for Utility owned or operated charging infrastructure, services that are clearly outside its core functions as a regulated utility. UGI Electric's proposed EV Program would require ratepayers to fund EV infrastructure that is owned and operated by UGI Electric, as well as subsidize certain services not necessary to the provision of safe and adequate utility services. If UGI Electric's proposal is approved, it would provide the Company an unfair advantage through use of ratepayer funds and leveraging ratepayers-funded assets to undercut participants in the competitive market.

The Company's status as a regulated utility also offers it access to customer data that is not currently available to participants in the competitive market. Third parties operating in the competitive market are in the business of developing products and services that include time-of-use rates. UGI Electric's access to customer-owned data should be limited to fulfilling its core functions as a regulated utility and it should not

include time-of-use rates which are product offerings best suited to the competitive market.

Innovative energy solutions such as EV infrastructure are best delivered by the competitive marketplace rather than through regulated electric distribution companies. Solution-focused retailers are better positioned than utilities to encourage the adoption of EVs.

Q. DO YOU BELIEVE THAT THE COMPANY SHOULD BE ABLE TO RECOVER THE COST OF THE PROPOSED UTILITY-OWNED ELECTRIC VEHICLE CHARGING STATIONS THROUGH RATE BASE?

A. No. Innovation is largely driven by competitive companies. UGI Electric's proposal threatens to negatively impact this potential because the ability of a utility to fund projects through ratepayer dollars creates unfair competitive advantages and crowds out the ability of private companies to deploy these technologies.

Q. DO YOU GIVE MUCH WEIGHT TO UGI ELECTRIC'S CLAIM THAT THERE ARE NO PUBLIC CHARGING STATIONS IN THE UGI ELECTRIC SERVICE TERRITORY?

A. No, I do not. UGI Electric has a small service area within the state of Pennsylvania, serving approximately 62,000 customers in two counties. UGI Electric has failed to provide the number of registered electric vehicles in their service territory but has disclosed it is less than the State Average. (UGI Electric Statement No. 6 at 34). UGI Electric has not provided any evidence to justify the number of electric chargers required to support electric charging. UGI Electric has failed to acknowledge that 80% of charging happens at home and work. Regardless, UGI Electric's claims are inconsequential as there are numerous publicly-available EV charging stations surrounding and near the edge of UGI Electric's service territory. Finally, there is no evidence to support the implied claim that charging should in any way be defined by Utility service area.

Q. DO YOU THINK EV CHARGING IS A DISTRIBUTION UTILITY SERVICE?

A. No. EV stations use the distribution system, but they are not part of the distribution system, nor are they necessary to operate or maintain any existing distribution infrastructure. To conclude otherwise would mean that any electric consuming device may be owned and operated by a utility and the associated costs recovered from ratepayers, which is absurd. For example, a laundromat uses electricity to dry clothes. But that does not mean that laundromat should be considered distribution-related electric plant. Likewise, it would not make sense to permit utilities to invest and recover costs related to cell phone charging stations and kiosks. These simply are not traditional monopoly public utility services that customers should look to the distribution utility to provide.

Q. HAVE ANY OTHER STATES CONCLUDED THAT EV CHARGING SHOULD *NOT* BE CLASIFFIED AS A UTILITY SERVICE?

A. Yes, after an investigation, the Public Utilities Commission of Ohio concluded that EV charging stations "offer a type of service that is fundamentally different than the services offered by regulated utilities."[21] These 'behind-the-meter' services operate within the sphere of a competitive marketplace and are analogous to a cellphone battery charging port at an airport that requires compensation for service."[22]

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[21] *In the Matter of the Commission's Investigation Into Electric Vehicle Charging Service in the State*, Case No. 20-434-EL-COI, Find and Order at 15 http://dis.puc.state.oh.us/TiffToPDf/A1001001A20G01B43144B00409.pdf

[22] *Id.*

A. Data Access Issues

Q. PLEASE DESCRIBE UGI ELECTRIC'S CLAIM AS TO WHY IT SHOULD IMPLEMENT THE EV PROGRAM BECAUSE IT CAN UTILIZE CUSTOMER USAGE DATA.

A. UGI Electric claims that it plans to install and own EV charging stations to "gain additional first-hand metrics regarding EV charging utilization demands and usage patterns." (UGI Electric Statement No. 3 at 29). UGI Electric identified the following goal that the Company's proposal to own and operate EV charging stations will accomplish: "Gather charging station metrics, analytics, operational performance, and usage data, which would enable UGI Electric to promote future development of the EV marketplace." (UGI Electric Statement No. 3 at 30).

Q. UNDER UGI ELECTRIC'S PROPOSAL, WOULD PARTICIPANTS IN THE COMPETITIVE MARKET FOR EV PRODUCTS AND INSTALLATIONS, INCLUDING RETAIL ELECTRICITY SUPPLIERS, BE PROVIDED ACCESS TO THE SAME CUSTOMER USAGE DATA?

A. No. Under UGI Electric's proposal, stakeholders operating in the competitive market for EV products and installations would not be provided access to the EV charging data.

Q. PLEASE DESCRIBE THE SIGNIFICANCE OF THIS DATA TO PARTICIPANTS IN THE COMPETITIVE MARKET.

A. Customer usage data is critically important to engaging and educating customers about their electricity use. It is also critically important to developing individually tailored products, including time-of-use rates, and services designed to help consumers take control of their energy consumption.

Q. DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC'S POSITION REGARDING ACCESS TO AND UTILIZATION OF CUSTOMER-OWNED DATA?

A. Yes. UGI Electric's access to customer-owned data should be limited to fulfilling its core functions in a regulated utility. An example of an appropriate use of the customer-

owned data would be UGI Electric utilizing the data to analyze distribution circuit capacity so that if customers on a particular circuit adopt and install EV charging infrastructure, UGI Electric can better predict when upgrades are necessary or respond to outages more quickly. As UGI Electric's proposal does not provide third party entities that offer EV products and installations with access to customer data, UGI Electric would have an unfair advantage in offering electric EV products and installations.

In response to a discovery request from RESA and NRG, UGI Electric indicated that "The Company is willing to discuss the form and frequency of providing data related to EV station utilization demands and usage patterns to the public and parties to this proceeding." (see attached RESA/NRG Exhibit DP-4, UGI Electric Response to RESA/NRG Set I, No. 9). RESA and NRG recommend that UGI Electric be required to establish, as part of this proceeding, the form and frequency of data related to EV charging station utilization that it will provide to third parties so that access to charging data is available from the outset of any Commission-approved aspect of the proposed EV program.

B. <u>Third-Party EV Charging Stations</u>

Q. PLEASE DESCRIBE UGI ELECTRIC'S PROPOSAL FOR MAKE-READY INFRASTRUCTURE FOR THIRD-PARTY OWNED EV CHARGING STATIONS.

A. UGI Electric proposes to invest, own and maintain "make-ready" charging infrastructure that will be facilitated through changes to the Company's service extension regulations. UGI Electric Witness Taylor indicates that the "make-ready" work may include: (1) new transformer or transformer upgrades, as necessary to serve the new charging station load; (2) electric distribution service drop; (3) separate utility service meter for the charging station; (4) new electric service panel; and (5) associated conduit and conductor and ancillary equipment necessary to connect the EV charging stations to the electric grid.

Under UGI Electric's proposal, the charging station owner will purchase, install and operate/maintain the charging station. (UGI Electric Statement No. 6 at 38, 40).

Q. PLEASE ELABORATE ON UGI ELECTRIC'S THIRD-PARTY EV CHARGING STATION PROPOSAL.

A. Based on a review of UGI Electric's proposed tariff language, UGI Electric will provide make-ready infrastructure for "Qualified EV Charging Stations" available to the public. The term "Qualified EV Charging Stations" is defined to mean one (1) to four (4) DC fast charge ("DCFC") stations of 50kW or greater supporting SAE/CCS and Tesla plugs configurations at a minimum that are located along a major highway and in a commercial retail office, hotel, or shopping location with parking for at least 100 vehicles, or located at a gas station, or in another location at UGI Electric's discretion. The installation locations may also have one or more adjacent Level 2 charging stations. (UGI Electric Proposed Tariff Supplement No. 26, First Revised Page 17).

Q. WHAT DO THE PROPOSED CHANGES TO THE COMPANY'S TARIFF PROVIDE?

A. The proposed tariff language in Rule 5, subsections 5-l and 5-m indicates that UGI Electric will provide all investment in establishing EV charging stations without contribution, and will install required infrastructure (conductor, transformers, services, and meters) necessary for operation. UGI Electric will provide such facilities with no customer contribution required until September 30, 2026.

Q. DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC'S PROPOSAL TO PROVIDE MAKE-READY INFRASTRUCTURE FOR THIRD-PARTY OWNED EV CHARGING STATIONS?

A. Yes. There is no need for the Utility to bear this burden. The competitive market has already demonstrated a willingness and expertise to build 1,596 Level 2 charging stations

and another 324 DC fast charging stations in the Commonwealth.[23] There is no need for additional Utility intervention.

If the Commission permits UGI Electric to provide make-ready infrastructure for third-party owned EV charging stations, I am concerned that UGI Electric's proposal to provide the infrastructure is not competitively neutral. UGI Electric's proposed criteria for "Qualified EV Charging Stations" attempts to micro-manage the placement and technology (which is bound to change) utilized for the third-party owned EV charging stations. It is also not clear from UGI Electric's proposal whether third parties seeking to own and operate third-party charging stations that do not meet the criteria of "Qualified EV Charging Stations" have a means to connect to UGI Electric's distribution system.

C. Customer Education and Outreach

Q. WHAT IS THE EV EDUCATION COMPONENT OF UGI ELECTRIC'S EV PROGRAM PROPOSAL?

A. UGI Electric proposes to provide customers education and information regarding EVs. Examples of information that would be provided include how to connect EV charging equipment, the cost of EV charging from the grid, and differences in EV charging levels. (UGI Electric Statement No. 6 at 41).

Q. WHAT OUTREACH EFFORTS DOES UGI ELECTRIC PROPOSE?

A. UGI Electric Witness Taylor offers that the EV Education component may include: (1) a dedicated webpage for information and details on the program; (2) communication through non-website channels such as bill inserts, television campaigns, social media,

[23] Pennsylvania Electric Vehicle Roadmap: 2021 Update, Pennsylvania Department of Environmental Protection, see https://files.dep.state.pa.us/Energy/OfficeofPollutionPrevention/StateEnergyProgram/PAElectricVehRoadmapBookletDEP5334.pdf

digital and print media; (3) program collateral including UGI Electric and customer roles and requirements, program costs and benefits, customer applications, FAQs, etc.; and (4) collaboration with government and non-governmental organizations to share details regarding the program and general EV education for communities in UGI Electric's service territory. (UGI Electric Statement No. 6 at 41).

Q. DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC'S PROPOSED CUSTOMER EDUCATION AND OUTREACH EFFORTS?

A. My key concern is that UGI Electric provide accurate education to consumers. UGI Electric has failed to demonstrate an understanding of the current market dynamics, the consumer dynamics and the general forces shaping EV adoption. There are misconceptions that should be debunked so that customers feel more confident making the switch to EVs.

Q. DO YOU HAVE ANY RECOMMENDATIONS REGARDING UGI ELECTRIC'S PROPOSED CUSTOMER EDUCATION AND OUTREACH EFFORTS?

A. Yes. I recommend that UGI Electric establish a coordinated education campaign that includes participation by the Pennsylvania Public Utility Commission and third-party interested stakeholders such as suppliers and EV charging companies. A coordinated education campaign would help to ensure that messaging is competitive neutral and that the messaging is widely received.

V. CONCLUSION

Q. DOES THAT COMPLETE YOUR DIRECT TESTIMONY?

A. Yes.

Exhibit DP-1

UGI Utilities, Inc. - Electric Division
Docket No. R-2021-3023618
UGI Electric 2021 Base Rate Case
Responses to RESA-NGS Set I (1 thru 27)
Delivered on April 23, 2021

RESA-NGS-I-17

Request:

Reference UGI Statement No. 3, page 29, lines 18-20.

a. What criteria will UGI utilize to evaluate whether a location should house Level 2 charger installations?

b. When will UGI determine whether the three EV charging stations it proposes will include Level 2 chargers?

Response:

a. The primary criteria will be location, space and access. The Company will work with the property owners that are partnering with UGI Electric to discuss the location and additional space that would be required to include additional Level 2 chargers adjacent to the DC Fast charging equipment.

b. At this point, the Company anticipates that each location will include two Level 2 chargers.

Prepared by or under the supervision of: Eric W. Sorber

Exhibit DP-2

UGI Utilities, Inc. - Electric Division
Docket No. R-2021-3023618
UGI Electric 2021 Base Rate Case
Responses to OSBA Set I (1 thru 26)
Delivered on n/a - April 5, 2021 (printing date)

OSBA-I-21

Request:

Reference UGI Electric Statement No. 6, pages 28-44:

a. Please explain how third party EV charging station operators will be able to compete with utility-owned stations in UGI Electric's service territory, if the non-electric capital and operating costs for utility stations are recovered in distribution rates.

b. Please specify the tariff charges and rate schedule that will apply to Company distribution service to non-company-owned EV charging stations.

c. Please estimate the annual billing determinants for the Company's three proposed charging stations if they were subject to rate GS-4.

d. Please explain how the Company will obtain electric supply for service under this tariff. If default service supplies are used, how will default service customers be credited for use by company-owned EV charging stations? Are the current default service wholesale suppliers obligated to meet this load?

e. Please explain how the Company intends to go about retaining a network provider, how the network provider will be compensated, and what its specific responsibilities will include.

Response:

a. As discussed in UGI Electric Statement No. 3, the Direct Testimony of Eric W. Sorber, no EV charging stations exist within the service territory today; accordingly, it is unknown as to when any third party charging stations may be installed within the Company's service territory. The Company anticipates charging station pricing to be established based on prevailing market or standard pricing criteria and specifically is not proposing a cost based pricing structure for EV charging services. The Company is working with ChargePoint to evaluate related pricing criteria and factors.

b. Third-party EV charging stations would be served under the appropriate UGI Electric Service Tariff rate schedule, as defined by the character of the power service being provided to the whole of the service location, including the number

UGI Utilities, Inc. - Electric Division
Docket No. R-2021-3023618
UGI Electric 2021 Base Rate Case
Responses to OSBA Set I (1 thru 26)
Delivered on n/a - April 5, 2021 (printing date)

OSBA-I-21 (Continued)

and type of charging facilities at the location. Thus for non-residential applications, service may be provided under Rate GS-1, GS-4 or LP.

c. Under the current GS-4 rate and assuming a configuration of one (1) DC Fast charge unit and two (2) Level 2 chargers (single port) per installation site, the billing determinants would consist of a customer charge of $15/month or $180 annually, a demand charge of $201.60 (based on an estimated maximum demand of 79kW) or $2,419.20 annually, and an energy charge per kWh utilized which will be a function of station utilization. The Company does not have an estimated kWh consumption figure per station developed at this time but is working with ChargePoint on understanding anticipated utilization rates.

d. Electric supply for the charging stations will be considered Company Use supply. Accordingly, this supply is procured from all customers as a function of the line loss applied to all power deliveries to the UGI Electric system.

e. The Company intends to install ChargePoint equipment and utilize their network services. The network services are covered under an annual fee as discussed in the response to I&E-RE-55-D(C). Network services cover the real-time monitoring and administration of the charging units including scheduled charging, analytics and reporting, pricing and automatic funds collection, energy management, driver support, and predictive maintenance and diagnosis. As the world’s largest and most open charging network provider, ChargePoint is considered a best-of-breed partner by the Company for products and services.

Prepared by or under the supervision of: Eric W. Sorber

Exhibit DP-3

UGI Utilities, Inc. - Electric Division
Docket No. R-2021-3023618
UGI Electric 2021 Base Rate Case
Responses to RESA-NGS Set I (1 thru 27)
Delivered on April 23, 2021

RESA-NGS-I-12

Request:

Does UGI intend to implement an electric vehicle-specific time-of-use rate?

a. If yes, please describe how UGI will establish the prices for the various time intervals.

b. If yes, will the time-of-use rate be voluntary?

c. If yes, how will the energy to be used for this purpose be procured?

Response:

a. The Company anticipates EV charging station pricing to be established based on prevailing market or standard pricing criteria and specifically is not proposing a cost based pricing structure for EV charging services. The Company is working with ChargePoint to evaluate related pricing criteria and factors which may vary with time of use. Pricing and associated parameters are yet to be determined.

b. Please see the response to (a) above.

c. Please see the response to OSBA-I-21(d).

Prepared by or under the supervision of: Eric W. Sorber

Exhibit DP-4

UGI Utilities, Inc. - Electric Division
Docket No. R-2021-3023618
UGI Electric 2021 Base Rate Case
Responses to RESA-NGS Set I (1 thru 27)
Delivered on April 23, 2021

RESA-NGS-I-9

Request:

Reference UGI Electric Statement No. 3, page 29, lines 14-17, regarding Mr. Sorber's statement that the Company seeks to "gain additional first-hand metrics regarding EV charging utilization demands and usage patterns."

a. Please describe whether the EV charging utilization and usage data will be made publicly available in real time or quasi-real time and in an anonymized fashion. If the charging usage data will not be made publicly available, please explain why.

Response:

The Company is willing to discuss the form and frequency of providing data related to EV station utilization demands and usage patterns to the public and parties to this proceeding. Ultimately, the goal of this program is to foster EV utilization in the UGI Electric service territory and a market driven expansion of EV charging infrastructure.

Prepared by or under the supervision of: Eric W. Sorber

Exhibit DP-5

UGI Utilities, Inc. - Electric Division
Docket No. R-2021-3023618
UGI Electric 2021 Base Rate Case
Responses to RESA-NGS Set I (1 thru 27)
Delivered on April 23, 2021

RESA-NGS-I-27

Request:

May a customer request a second meter to register EV charging use?

a. If so, will there be a fee for installation of the second meter?

b. If there will be a fee for installation of the second meter, how much will the fee be?

Response:

At this time, the UGI Electric tariff would only provide for a second meter if the customer requested and installed a separate electric service which, in this context, was solely supplying their EV charger. This service would be supplied under the applicable tariff schedule and associated charges.

Prepared by or under the supervision of: Eric W. Sorber

VERIFICATION

I, Danita Park, hereby state that: (1) I am the Director, Electric Vehicle and Commercial Development for NRG Energy, Inc.; (2) that I am authorized to submit this testimony on behalf of the Retail Energy Supply Association and NRG Energy, Inc.; (3) the facts set forth in this testimony are true and correct (or are true and correct to the best of my knowledge, information and belief); and (4) that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Danita Park

Dated: June 7, 2021

Danita Park
Director, Electric Vehicle and
Commercial Development
NRG Energy, Inc.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

REBUTTAL TESTIMONY OF

DANITA PARK

ON BEHALF OF THE
RETAIL ENERGY SUPPLY ASSOCIATION
AND NRG ENERGY, INC.

Docket No. R-2021-3023618

UGI Utilities, Inc. – Electric Division
2021 Base Rate Proceeding

TOPIC:

Electric Vehicle Program

May 27, 2021

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND TITLE.

A. My name is Danita Park. I am employed by NRG Energy, Inc. ("NRG") and serve as Director, Electric Vehicle and Commercial Development.

Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?

A. Yes. On May 3, 2021, I submitted direct testimony on behalf of the Retail Energy Supply Association ("RESA")[1] and NRG Energy, Inc.[2] marked as RESA/NRG Statement No. 2. The direct testimony was accompanied by five (5) exhibits marked as Exhibit DP-1 through DP-5.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to the testimony of certain parties who submitted direct testimony in this proceeding. In broad terms, my rebuttal testimony addresses issues regarding UGI Utilities, Inc. – Electric Division's ("UGI Electric" or "Company") proposed Electric Vehicle ("EV") Program. First, I summarize the testimony of the parties that, similar to RESA and NRG, oppose certain aspects of the proposed EV Program. Second, I respond to the parties that expressed support for UGI Electric's proposed EV Program: (1) the direct testimony on behalf of the Bureau of

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[1] The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

[2] NRG's license retail supply companies include: Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business A-2010-2192350; Green Mountain Energy Company A-2011-2229050; Energy Plus Holdings LLC A-2009-2139745; XOOM Energy New Jersey, LLC A-2012-2283821; Stream Energy New Jersey, LLC A-2010-2181867; Direct Energy Services, LLC A-110164; Direct Energy Business, LLC A-110025; Direct Energy Business Marketing, LLC A-2013-2368464; and Gateway Energy Services Corporation A-2009-2137275.

Investigation and Enforcement ("I&E") by Ethan Cline (I&E Statement No. 1); and (2) the direct testimony on behalf of ChargePoint, Inc. ("ChargePoint") by Matthew Deal (ChargePoint Statement No. 1).

Q. ASIDE FROM RESA/NRG, DID ANY OTHER PARTY OPPOSE UGI ELECTRIC'S PROPOSED EV PROGRAM IN DIRECT TESTIMONY?

A. Yes. The Office of Consumer Advocate ("OCA") expressed concerns with UGI Electric's proposed ownership of the EV charging stations because it would allow a regulated utility to enter into an unregulated competitive market. (OCA Statement No. 1 at 13). OCA recommends that UGI Electric not be allowed to own the charging stations and that proposed Rate EV-C and the proposed modifications to UGI Electric's service line extension rules not be adopted by the Commission. (OCA Statement No. 1 at 14).

The Office of Small Business Advocate ("OSBA") also opposed UGI Electric's EV Program. OSBA Witness Knecht cited several reasons for opposing the EV Program, including that: (1) UGI Electric has done little or no due diligence regarding the potential market for public EV charging services in its territory; (2) UGI Electric's proposal is inequitable to ratepayers who assume responsibility for all costs while revenue benefit flows to UGI; (3) UGI Electric's proposal is anti-competitive in that it provides UGI an advantage over competitors in the development of public EV charging infrastructure; and that (4) President Biden's proposed infrastructure plan contemplates substantial subsidies to EV charging station development. (OSBA Statement No. 1 at 25-26). While OSBA recommends that the Commission reject UGI's EV charging proposal, it recommends that, if the Commission approves the program, EV charging stations be offered on a temporary basis during the industry development period and on a competitively neutral basis. (OSBA Statement No. 1 at 26-27).

The Direct Testimony of Brandi Brace expressed similar concerns about UGI Electric's proposed EV Program. Ms. Brace indicated that UGI Electric's proposal would give UGI Electric an advantage over potential competitors by using revenue obtained from ratepayers to deploy EV charging. (Direct Testimony of Brandi Brace at 4, 22-23).

Q. DO YOU SUPPORT OCA, OSBA AND BRANDI BRACE'S POSITIONS REGARDING UGI ELECTRIC'S PROPOSED EV PROGRAM?

A. Yes. OCA, OSBA and Brandi Brace raise valid concerns about UGI Electric's EV Program. I continue to support customer education efforts on EV charging as indicated in my Direct Testimony and recommend that the Commission reject UGI Electric's request to construct and own three charging stations and invest in make-ready infrastructure. (RESA/NRG Statement No. 2 at 7).

II. RESPONSE TO BIE'S POSITION ON UGI ELECTRIC'S PROPOSAL TO INSTALL AND OWN THREE EV CHARGING STATIONS

Q. WHAT IS I&E WITNESS CLINE'S POSITION REGARDING UGI ELECTRIC'S PROPOSED EV PROGRAM?

A. I&E Witness Cline recommends that UGI Electric's proposal to install and own three EV charging stations in its service territory be approved. I&E Witness Cline's testimony does not address the other components of UGI Electric's Proposed EV Program. (I&E Statement No. 3 at 2-5).

Q. IS MR. CLINE'S RECOMMENDATION BASED, IN PART, ON INCONSEQUENTIAL INFORMATION PROVIDED BY UGI ELECTRIC?

A. Yes. I&E Witness Cline's recommendation that the Commission approve UGI Electric's request to construct and own three EV charging stations is based, in part, on inconsequential information provided in the Direct Testimony of UGI Electric Witness Sorber (UGI Electric Statement No. 3).

Q. PLEASE EXPLAIN.

A. In explaining why UGI Electric proposed to install and own three EV charging stations, I&E Witness Cline cited the claim in UGI Electric Witness Sorber's testimony that there are no publicly-available EV charging stations in its service territory. (UGI Electric Statement No. 3 at 29; I&E Statement No. 3 at 3). As indicated in my direct testimony, there are numerous publicly-available EV charging stations surrounding and near the edge of the service territory and the siting of public charging stations should not be driven by utility boundaries. (RESA/NRG Statement No. 2 (REVISED) at 18).

Q. DO YOU AGREE WITH MR. CLINE'S RECOMMENDATION THAT THE COMMISSION APPROVE UGI ELECTRIC'S PROPOSAL TO INSTALL AND OWN THREE EV CHARGING STATIONS IN ITS SERVICE TERRITORY?

A. No. As expressed in my direct testimony, I recommend that the Commission reject UGI Electric's request to construct and own three EV charging stations as there is no need for utility intervention in the EV charging competitive market. (RESA/NRG Statement No. 2 at 5-6).

Q. DOES I&E WITNESS CLINE HAVE ANY RECOMMENDATIONS REGARDING UGI ELECTRIC'S PROPOSAL TO INSTALL AND OWN THREE EV CHARGING STATIONS?

A. Yes. I&E Witness Cline proposes that starting one year after the first EV charging station is deployed and on an annual basis thereafter, UGI Electric provide an update on the status of the program, the corresponding plant, operating expenses, revenue and the progress that has been made toward meeting its goals. Additionally, I&E recommends that UGI Electric "provide a detailed discussion regarding its choice to either end, continue as is, or expand its EV charging station operations." (I&E Statement No. 3 at 5).

Q. DO YOU HAVE ANY CONCERNS REGARDING I&E WITNESS CLINE'S RECOMMENDATIONS?

A. Yes. I&E's proposed reporting requirements appear to provide UGI Electric the option to end, continue or expand its EV charging station operations outside the context of a base rate case or other Commission proceeding. As explained in my Direct Testimony, I have significant concerns about UGI Electric utilizing ratepayer funds to install and own EV charging stations given that UGI has failed to demonstrate a need for such ratepayer investment.

I am also concerned that BI&E's proposed reporting requirements do not address charging station metrics, analytics, and usage data. If UGI Electric is permitted to proceed with its proposed program, which I advise against, it should be required to establish the form and frequency of data related to EV charging station utilization, charging station metrics and analytics that it will provide to third parties so that UGI Electric does not have an unfair advantage in offering electric EV products and installations.

III. RESPONSE TO CHARGEPOINT'S RECOMMENDATIONS REGARDING UGI ELECTRIC'S PROPOSED EV PROGRAM

Q. PLEASE DESCRIBE CHARGEPOINT'S RELATIONSHIP WITH UGI ELECTRIC AS IT PERTAINS TO UGI ELECTRIC'S PROPOSAL TO INSTALL AND OWN THREE EV CHARGING STATIONS.

A. UGI Electric intends to partner with ChargePoint and proposes to install ChargePoint equipment and utilize ChargePoint's network services. (see RESA/NRG Exhibit DP-2, UGI Electric Response to OSBA Set I, No. 21 and RESA/NRG Exhibit DP-6, UGI

Electric Response to OSBA Set I, No. 14).[3] ChargePoint will presumably benefit financially if UGI Electric's proposed EV Program is approved in this proceeding.

Q. WHAT IS CHARGEPOINT'S POSITION REGARDING UGI ELECTRIC'S PROPOSAL TO OWN AND OPERATE EV CHARGERS AT THREE SITES IN ITS SERVICE TERRITORY?

A. As a financial beneficiary of UGI's proposed program, ChargePoint supports UGI Electric's proposal to install and own EV chargers at three sites in its service territory. ChargePoint argues that the program makes sense so long as the following parameters are in place: (1) UGI Electric provides site hosts the ability to choose the EV charging equipment and network service provider to be deployed on their property from a list of vendors previously qualified by the utility; and (2) UGI Electric allow site hosts to establish the prices and pricing policies for EV charging services provided at the utility-owned chargers. ChargePoint also recommends that "site hosts be the utility customer-of-record and be responsible for paying the regular bills associated with the electricity used for charging services through standard tariffs." (ChargePoint Statement No. 1 at 8-10).

Q. DO YOU SUPPORT CHARGEPOINT'S RECOMMENDATIONS?

A. I do not. While I agree with ChargePoint's assertion that utility participation in the EV Charging market can harm competitive market forces – I do not support UGI Electric's proposal to own and operate EV charges at three sites. (ChargePoint Statement No. 1 at 8). ChargePoint has been identified by UGI Electric as the provider of both EV charging equipment and network services for these three sites. (see RESA/NRG Exhibit DP-2, UGI Electric Response to OSBA Set I, No. 21, and RESA/NRG Exhibit DP-6, UGI

[3] UGI Electric is currently installing two ChargePoint Level 2 chargers at the Company's Wilkes-Barre office to provide charging for UGI Electric's two all-electric vehicles. RESA/NRG Exhibit DP-6.

Electric Response to OSBA Set I, No. 14). In addition, ChargePoint has been working with UGI Electric to evaluate EV charging station pricing criteria and factors that may vary with time of use. (see RESA/NRG Exhibit DP-3, UGI Electric Response to RESA and NRG Set I, No. 12). ChargePoint's suggestion that site hosts should have the ability to choose the EV charging equipment and network service provider to be deployed on their property and establish the prices for EV charging services for EV charging services provided at the utility-owned chargers seems at odds with its arrangements with UGI Electric, and does little to assuage my concerns.

In addition, ChargePoint's recommendations assume that the electricity supplied to these EV chargers would be provided by UGI Electric under tariffed rates, rather than by competitive electric generation suppliers, who are adept at offering pricing plans specifically geared toward EV charging. UGI Electric's role in the electricity supply market is that of default supplier only. Customers must be free to choose the electric generation supplier supplying electricity to any EV charging stations deployed on their property.

Q. DOES CHARGEPOINT RECOMMEND ANY MODIFICATIONS TO UGI ELECTRIC'S MAKE-READY PROPOSAL?

A. Yes. ChargePoint recommends that UGI Electric's make-ready proposal be modified to require: (1) any EV chargers installed through the program be networked; (2) all Level 2 charging equipment be ENERGY STAR certified; and (3) charging equipment be certified by a third-party Nationally Recognized Testing Laboratory for safety.

Q. IF THE COMMISSION DECIDES TO ALLOW UGI ELECTRIC TO INVEST IN, OWN AND MAINTAIN MAKE-READY INFRASTRUCTURE, ARE YOU OPPOSED TO THE AFOREMENTIONED MODIFICATIONS PROPOSED BY CHARGEPOINT?

A. As I have previously stated, I oppose UGI Electric's make-ready proposal. If the Commission decides to approve UGI Electric's make-ready program, I do not oppose the modifications proposed by ChargePoint, with the exception that any EV chargers installed through the program be networked ***only if*** the data is made available to all third parties to ensure a fair and level playing field.

IV. CONCLUSION

Q. DOES THAT COMPLETE YOUR REBUTTAL TESTIMONY?

A. Yes.

VERIFICATION

I, Danita Park, hereby state that: (1) I am the Director, Electric Vehicle and Commercial Development for NRG Energy, Inc.; (2) that I am authorized to submit this testimony on behalf of the Retail Energy Supply Association and NRG Energy, Inc.; (3) the facts set forth in this testimony are true and correct (or are true and correct to the best of my knowledge, information and belief); and (4) that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Danita Park

Dated: June 7, 2021

Danita Park
Director, Electric Vehicle and
Commercial Development
NRG Energy, Inc.

Exhibit DP-6

UGI Utilities, Inc. - Electric Division
Docket No. R-2021-3023618
UGI Electric 2021 Base Rate Case
Responses to OSBA Set I (1 thru 26)
Delivered on April 5, 2021

OSBA-I-14

Request:

Reference UGI Electric Statement No. 3, pages 29-31, EV charging stations:

a. Please identify the number of EVs registered in UGI Electric's service territory.

b. Please provide the Company's estimate of the expected load, revenues, and operating costs for the EV charging stations.

c. Please describe all efforts made by UGI Electric to work with third party charging station entities (e.g., ChargePoint, Electrify America) to understand their needs and interests in developing charging stations in the UGI Electric service territory.

Response:

a. As of September 30, 2020, 260 electric vehicles were registered in Luzerne County, PA and 23 electric vehicles were registered in Wyoming County (vehicle statistics provided by ChargePoint). UGI Electric provides electric distribution service to a significant portion of Luzerne County and a small portion of Wyoming County.

b. The Company does not have an estimate of the load (utilization) or revenues for the proposed EV charging stations at this time but is working with ChargePoint as the largest and most open network operator in the world to understand how such initial estimates may be developed. Operating costs are provided in response to I&E-RE-55-D(C).

c. As noted above, UGI Electric is working with ChargePoint as the largest and most open network operator in the world to facilitate the Company's EV charging station proposal. Per ChargePoint, there are no current, pending or proposed public DC Fast Charge stations which will be ChargePoint networked stations within the Company's service territory other than those proposed by the Company at this time. Currently, the Company is installing two ChargePoint Level 2 charges at the Company's Wilkes-Barre office to provide charging for UGI Electric's first two all-electric vehicles.

Prepared by or under the supervision of: Eric W. Sorber