

July 8, 2021

***Via Electronic Filing***

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**RE: Docket R-2021-3023618, Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Electric Division**

Dear Secretary Chiavetta,

Per Section 5.412a of the Commission’s regulations, 52 Pa. Code § 5.412a, requiring electronic submission of pre-served testimony, please find enclosed for electronic filing the following testimony and exhibits on behalf of ChargePoint, Inc. (“ChargePoint”). These documents were admitted into the record in the above-referenced proceeding on June 29, 2021.

<b>Testimony</b>	<b>Witness</b>	<b>Exhibits</b>
ChargePoint Statement No. 1	Direct Testimony of Matthew Deal, including Attachment MJD-1	Exhibit MJD-1
ChargePoint Statement No. 2	Rebuttal Testimony of Matthew Deal	Exhibit MJD-2

All parties and the presiding officers have been previously served the aforementioned Testimony and Exhibits. Copies of this correspondence will be provided as indicated on the Certificate of Service.

Please contact me if you have any questions concerning this matter.

Respectfully submitted,

/s/ Scott F. Dunbar

Scott F. Dunbar  
Keyes & Fox LLP  
1580 Lincoln St., Suite 1105  
Denver, CO 80203  
(949) 525-6016  
[sdunbar@keyesfox.com](mailto:sdunbar@keyesfox.com)

James M. Van Nostrand  
Pennsylvania Bar # 327054  
Keyes & Fox LLP  
320 Fort Duquesne Boulevard, #15K  
Pittsburgh, PA 15222  
(304) 777-6050  
[jvannostrand@keyesfox.com](mailto:jvannostrand@keyesfox.com)

Counsel for: ChargePoint, Inc.

CC: Hon. Steven K. Haas (*Letter and Certificate of Service Only*)  
Certificate of Service (*Letter and Certificate of Service Only*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3023618
	:	
UGI Utilities, Inc. – Electric Division	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties by electronic mail.

Scott B. Granger, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Steven C. Gray, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17109-1923  
[sgray@pa.gov](mailto:sgray@pa.gov)

Kent Murphy, Esquire  
Michael S. Swerlin, Esquire  
Danielle Jouenne, Esquire  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
[murphyke@ugicorp.com](mailto:murphyke@ugicorp.com)  
[swerlingm@ugicorp.com](mailto:swerlingm@ugicorp.com)  
[jouenned@ugicorp.com](mailto:jouenned@ugicorp.com)

Devin T. Ryan, Esquire  
Garrett P. Lent, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[dryan@postschell.com](mailto:dryan@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)

David B. MacGregor, Esquire  
Post & Schell, P.C.  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2808  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)

Joseph L. Vullo, Esquire  
Commission on Economic Opportunity  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)

Philip D. Demanchick  
Darryl A. Lawrence  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[pdemanchick@paoca.org](mailto:pdemanchick@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[OCAUGIElectric2021@paoca.org](mailto:OCAUGIElectric2021@paoca.org)

Cody T. Murphey, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
919 E. Main Street, Suite 1300  
Richmond, VA 23219  
[cmurphey@eckertseamans.com](mailto:cmurphey@eckertseamans.com)

Brandi Brace  
114 Hartman Road  
Hunlock Creek, PA 18621  
[BrandiBrace@protonmail.com](mailto:BrandiBrace@protonmail.com)

Lindsey Yeider Wosik  
97 Midland Drive  
Dallas, PA 18162  
[mlowosik@gmail.com](mailto:mlowosik@gmail.com)

Lisa Infantino  
30 W. Pettebone Street  
Forty Fort, PA 18704  
[Lisac.infantin@gmail.com](mailto:Lisac.infantin@gmail.com)

Date: July 8, 2021

John W. Sweet, Esquire  
Ria M. Pereira, Esquire  
Pennsylvania Utility law Project  
118 Locust Street  
Harrisburg, PA 17101  
[jsweetpulp@palegalaid.net](mailto:jsweetpulp@palegalaid.net)  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Deanne M. O'Dell, Esquire  
Sarah C. Stoner, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[sstoner@eckertseamans.com](mailto:sstoner@eckertseamans.com)

Bridgett Brosius  
71 Dobson Road  
Sweet Valley, PA 18656  
[Bridgett.brosius@yahoo.com](mailto:Bridgett.brosius@yahoo.com)

Roger & Maria Hogue  
18 Gordon Avenue  
Dallas, PA 18612  
[Mchog36@gmail.com](mailto:Mchog36@gmail.com)

The Honorable Steven K. Haas  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[sthaas@pa.gov](mailto:sthaas@pa.gov)

/s/ Alicia Zaloga

Alicia Zaloga  
KEYES & FOX LLP  
1155 Kildaire Farm Road, Ste. 202-203  
Cary, NC 27511  
Tele: (919) 825 – 1739  
Email: [azaloga@keyesfox.com](mailto:azaloga@keyesfox.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	<b>:</b>	<b>Docket Number</b>
<b>v.</b>	<b>:</b>	<b>R-2021-3023618</b>
<b>UGI Utilities, Inc. – Electric Division</b>	<b>:</b>	

**DIRECT TESTIMONY  
OF  
MATTHEW DEAL**

**ON BEHALF OF  
CHARGEPOINT, INC.**

**ChargePoint Statement No. 1**

**May 3, 2021**

1        **I. Introduction and Summary of Recommendations.**

2        **Q: Please state your name.**

3        A: My name is Matthew Deal.

4        **Q: By whom are you employed and in what position?**

5        A: I am Manager of Utility Policy at ChargePoint, Inc (ChargePoint).

6        **Q: Please describe your qualifications, including your background, experience, and**  
7        **expertise.**

8        A: In my role at ChargePoint, I have led or coordinated engagement in over 15 proceedings  
9        before public utility commissions regarding the development of policies and programs that  
10       expand electric vehicle infrastructure and advance best practices within the electric vehicle  
11       charging industry. I have drafted stakeholder comments regarding the design of electric  
12       vehicle programs in Pennsylvania and other states.

13       My relevant professional experience appears in my CV, which is attached as  
14       Attachment MJD-1.

15       **Q: Have you previously provided testimony in any formal hearings before regulatory**  
16       **commissions?**

17       A: Yes. I have submitted comments and appeared as a witness regarding electric vehicle (EV)  
18       issues before utility regulatory commissions in Connecticut in 17-12-03RE04: Public  
19       Utilities Regulatory Authority Investigation into Distribution System Planning of the  
20       Electric Distribution Companies – Zero Emission Vehicles.

21       **Q: Please describe ChargePoint.**

22       A: ChargePoint is a world leading electric vehicle (EV) charging network, providing scalable  
23       solutions for every charging scenario from home and multifamily to workplace, parking,

1 hospitality, retail, and transport fleets of all types. ChargePoint’s cloud subscription  
2 platform and software-defined charging hardware is designed to enable businesses to  
3 support drivers, add the latest software features and expand fleet needs with minimal  
4 disruption to overall business.

5 ChargePoint’s hardware offerings include Level 2 (L2) and DC fast charging  
6 (DCFC) products, and ChargePoint provides a range of options across those charging levels  
7 for specific use cases including light duty, medium duty, and transit fleets, multi-unit  
8 dwellings, residential (multi-family and single family), destination, workplace, and more.  
9 ChargePoint’s software and cloud services enable EV charging station site hosts to manage  
10 charging onsite with features like Waitlist, access control, charging analytics, and real-time  
11 availability. With modular design to help minimize downtime and make maintenance and  
12 repair more seamless, all products are also UL-listed and CE (EU) certified, while Level 2  
13 solutions are ENERGY STAR® certified.

14 ChargePoint’s primary business model consists of selling smart charging solutions  
15 directly to businesses and organizations while offering tools that empower station owners  
16 to deploy EV charging designed for their individual application and use case. ChargePoint  
17 provides charging network services and data-driven, cloud-enabled capabilities that enable  
18 site hosts to better manage their charging assets and optimize services. For example, with  
19 those network capabilities, site hosts can view data on charging station utilization,  
20 frequency and duration of charging sessions, set access controls to the stations, and set  
21 pricing for charging services. These features are designed to maximize utilization and align  
22 the EV driver experience with the specific use case associated with the specific site host.  
23 Additionally, ChargePoint has designed its network to allow other parties, such as electric

1 utilities, the ability to access charging data and conduct load management to enable  
2 efficient EV load integration onto the electric grid.

3 **Q: What is the purpose of your Direct Testimony?**

4 A: The purpose of my testimony is to address the EV charging-related proposals made by UGI  
5 Utilities, Inc. – Electric Division (UGI Electric or the Company) in this proceeding.

6 **Q: Please summarize your positions and recommendations for the Commission.**

7 A: I recommend that the Commission:

- 8 • Approve UGI Electric’s proposal to invest in, own, and maintain make-ready  
9 infrastructure needed to support customer-owned EV charging stations, and direct UGI  
10 Electric to require EV chargers deployed through the program to be smart or  
11 networked, ENERGY STAR certified, and tested for safety by a national testing  
12 laboratory such as UL;
- 13 • Direct UGI Electric to allow site hosts to choose the EV charging station equipment  
14 and network service provider for EV charging station locations at which UGI Electric  
15 has proposed to own chargers, and to allow site hosts to set prices to drivers.

16 **II. The Commission should approve UGI Electric’s make-ready proposal.**

17 **Q: What will you address in this section of your testimony?**

18 A: In this section of my testimony, I will address UGI Electric’s proposal to invest in, own,  
19 and maintain make-ready infrastructure.

20 **Q: What has the Company proposed with respect to make-ready infrastructure?**

21 A: UGI Electric states that it “is proposing to modify the service extension provisions in its  
22 tariff in order to specifically provide for Company investment allowance related to the  
23 installation of any make-ready infrastructure associated with Level 2 or DCFC charging



1 stations installed within the UGI Electric service territory that will be open to the public  
2 for use.”<sup>1</sup>

3 **Q: What is make-ready infrastructure?**

4 A: Generally speaking, make-ready infrastructure includes all the electrical and construction  
5 work necessary on both the utility’s side of the electric meter (front-of-meter) and the  
6 customer’s side of the electric meter (behind-the-meter) to make a site ready to connect EV  
7 charging equipment. I agree with UGI Electric that make-ready infrastructure includes the  
8 following:

- 9 • “New transformer or transformer upgrades, as necessary to serve the new charging  
10 station load;
- 11 • Electric distribution service drop;
- 12 • Separate utility service meter for the charging station;
- 13 • New electric service panel; and
- 14 • Associated conduit and conductor and ancillary equipment necessary to connect the  
15 EV charging stations to the electric grid.”<sup>2</sup>

16 **Q: Will UGI Electric’s proposal to own make-ready infrastructure encourage the  
17 deployment of EV charging stations?**

18 A: Yes, I believe that it will. The cost of make-ready infrastructure is often one of the largest  
19 cost categories of installing and hosting EV charging stations. UGI Electric’s proposal to  
20 own make-ready infrastructure through its service extension provisions will reduce the cost  
21 of installing EV charging equipment for site hosts. (I use the term “site host” to refer to the

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<sup>1</sup> UGI Electric Statement No. 6, Direct Testimony of John D. Taylor, p. 40.

<sup>2</sup> *Id.*

1 owner or lessor of the property on which an EV charging station is located. Site hosts  
2 include residential customers; owners of multifamily housing units (MFH); commercial  
3 customers that offer charging to the public, their customers, and/or their employees; fleet  
4 owners; and government entities.) Under UGI Electric’s proposal, site hosts will still be  
5 responsible for the cost of the EV charging equipment itself and the cost of network  
6 services used to operate the chargers.

7 **Q: In addition to reducing the cost of installing EV charging stations for site hosts, are**  
8 **there other benefits to UGI Electric’s proposal to own make-ready infrastructure?**

9 A: Yes, UGI Electric’s make-ready proposal will allow charging station site hosts to choose  
10 the EV charging equipment and network service provider that best meets their needs, which  
11 supports the existing competitive market for EV charging station hardware and network  
12 services. By leveraging the utility’s access to capital and expertise managing construction  
13 projects to install panels, conduit, wiring, and other make-ready infrastructure, customers  
14 will enjoy a lower total cost for installing charging equipment and the utility will be able  
15 to generate additional kWh sales by increasing charging station deployment and  
16 encouraging EV adoption. By leveraging the competitive market for EV charging hardware  
17 and services, customers will be able to choose the charging equipment and network  
18 services that best fit their needs at a reasonable price. In short, by promoting customer  
19 choice in charging equipment and services and reducing the cost of installing EV charging  
20 stations, I believe UGI Electric’s proposal to own make-ready infrastructure will  
21 effectively support transportation electrification.

1 **Q: Do you recommend any modifications to UGI Electric’s make-ready proposal?**

2 A: Yes, I recommend that UGI Electric establish several eligibility criteria for EV charging  
3 stations that the make-ready program will support. First, I recommend that UGI Electric  
4 and the Commission require any EV chargers installed through the program be networked.  
5 Networked or smart charging equipment has the ability to communicate with the cloud and  
6 manage the charging of the electric vehicle. Smart chargers also enable drivers to locate  
7 publicly accessible chargers and determine if the station is in use in real-time. As EV  
8 adoption increases, the Company also may seek to offer additional programs or incentives  
9 for customers that leverage the capability of smart chargers. Encouraging the installation  
10 of smart chargers is a way to ensure customers will be able to participate in such programs  
11 in the future. Additionally, the data that smart chargers can capture greatly exceeds non-  
12 networked charging stations. Because these charging stations will be installed behind the  
13 customer’s existing meter, ChargePoint believes that the only way to accurately and  
14 reliably gather the data to inform future program design is to require chargers to be smart.

15 Second, I recommend that all Level 2 charging equipment be ENERGY STAR  
16 certified. The US Environmental Protection Agency awards ENERGY STAR certification  
17 to EV charging equipment that meets specific efficiency standards in standby mode,  
18 meaning that a charger conserves energy when not actively charging. ENERGY STAR  
19 certified chargers can use up to 40% less energy than standard chargers while not in active  
20 use.<sup>3</sup> To fully achieve the benefits of electrifying the transportation sector, the Commission  
21 should require that all Level 2 charging equipment that is installed under UGI Electric’s  
22 make-ready program be ENERGY STAR certified.<sup>4</sup>

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<sup>3</sup> [https://www.energystar.gov/products/other/ev\\_chargers](https://www.energystar.gov/products/other/ev_chargers).

<sup>4</sup> ENERGY STAR certification is not yet available for DCFCs.

1 Third, I recommend that the Commission require that charging equipment be  
2 certified by a third-party Nationally Recognized Testing Laboratory for safety. Requiring  
3 products to be certified by a third-party Nationally Recognized Testing Laboratory, such  
4 as Underwriters Laboratories or UL, gives customers and regulators confidence that they  
5 are purchasing or incentivizing products that have been rigorously tested to ensure safety  
6 and reliability.

7 **Q: What do you recommend?**

8 A: I recommend that the Commission direct UGI Electric to require EV chargers installed  
9 through its make-ready proposal to meet the eligibility requirements I have described. I  
10 recommend the Commission approve UGI Electric’s proposal with those requirements.

11 **III. The Commission should require UGI Electric to provide site hosts with choice for**  
12 **its utility-owned EV charger program.**  
13

14 **Q: What will you address in this section of your testimony?**

15 A: In this section of my testimony, I will address UGI Electric’s proposal to own and operate  
16 EV charging stations at three locations.

17 **Q: What has the Company proposed with respect to owning EV charging station?**

18 A: UGI Electric states that it is proposing “to install and own three EV charging stations in an  
19 effort to support EV development directly within its service territory and gain additional  
20 first-hand metrics regarding EV charging utilization demands and usage patterns.”<sup>5</sup> UGI  
21 further states that “[t]hese EV charging stations will, at minimum, include DC fast charging  
22 facilities, but may also include Level 2 chargers.”<sup>6</sup> From the context, it is my understanding  
23 that UGI Electric uses the term “charging stations” to refer to particular locations with one

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<sup>5</sup> UGI Electric Statement No. 3, Direct Testimony of Eric W. Sorber, p. 29.

<sup>6</sup> UGI Electric Statement No. 6, Direct Testimony of John D. Taylor, p. 39.

1 or more EV chargers (like a gas station). Because the term “charging station” typically  
2 refers to the charging equipment itself, I will use the term “charger” to refer to equipment  
3 and the term “site” to refer to a location where one or more chargers are located.

4 **Q: What is ChargePoint’s position with respect to UGI Electric’s proposal to own EV**  
5 **chargers at three sites?**

6 A: ChargePoint commends UGI Electric for taking proactive actions to increase its  
7 understanding of EV charging utilization demands and usage patterns. The data gained  
8 from deployment of DCFC and L2 chargers will provide important learnings for the  
9 Company as well as EV drivers and local site hosts.

10 ChargePoint believes that utilities are vital stakeholders in growing a competitive,  
11 sustainable EV charging ecosystem and is not opposed in principle to utilities owning and  
12 operating EV chargers, as long as parameters are in place to ensure that the utility’s  
13 participation complements, rather than competes with, the competitive market. If utility  
14 participation in the competitive market crowds out other competitive providers, it could  
15 have long-term negative impacts on EV drivers and UGI Electric’s customers in the form  
16 of fewer choices and higher prices for EV charging services. Utility participation under the  
17 right parameters, however, can support the competitive market to encourage EV charger  
18 deployment and EV adoption. Accordingly, ChargePoint is not opposed to UGI Electric’s  
19 proposal to own and operate EV chargers at three sites in its service territory, as long as  
20 these parameters, which I describe below, are in place.

1 **Q: What parameters do you recommend to help ensure that UGI Electric’s proposal to**  
2 **own and operate EV charging stations supports and does not distort the competitive**  
3 **market for EV charging services?**

4 A: I recommend that UGI Electric provide site hosts the ability to choose the EV charging  
5 equipment and network service provider that is deployed on their property from a list of  
6 vendors previously qualified by the utility. There are examples in other jurisdictions of  
7 utilities owning and operating EV charging stations in a manner that maintains site host  
8 choice and site host operation, such as the San Diego Gas & Electric Power Your Drive  
9 Program, Pacific Gas & Electric’s EV Charge Network, and Southern California Edison’s  
10 Charge Ready 2 programs in California.<sup>7</sup> As discussed above with respect to the make-  
11 ready program, site hosts deploy EV chargers to support a wide variety of goals. The  
12 property owners who allow UGI Electric to install utility-owned EV chargers on their  
13 property will likewise have different goals and reasons for doing so, and they should be  
14 allowed to choose the equipment and network service provider that they believe will best  
15 support their unique goals. Enabling site hosts to choose their preferred EV charging  
16 solution ensures that a competitive market can thrive within utility programs and  
17 sustainably continue after the conclusion of those programs.

18 I also recommend that UGI Electric allow site hosts to establish the prices and  
19 pricing policies for EV charging services provided at the utility-owned chargers. Site host

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<sup>7</sup> See Decision Regarding Underlying Vehicle Grid Integration Application and Motion to Adopt Settlement Agreement, CPUC Docket No. A.14-04-014 (Jan. 28, 2016); Decision Directing PG&E to Establish an Electric Vehicle Infrastructure and Education Program, CPUC Docket No. 16-12-065 (Dec. 21, 2016); Decision Regarding Underlying Vehicle Grid Integration Application and Motion to Adopt Settlement Agreement, CPUC Docket No. A.14-04-014 (Jan. 28, 2016); Decision Directing PG&E to Establish an Electric Vehicle Infrastructure and Education Program, CPUC Docket No. 16-12-065 (Dec. 21, 2016); Decision Authorizing Southern California Edison Company’s Charge Ready 2 Infrastructure and Market Education Programs, CPUC Docket No. A.18-06-015 (Aug. 27, 2020).

1 control over pricing is also important to ensuring that site hosts can achieve their unique  
2 goals for hosting EV charging stations. For example, a restaurant may offer free or  
3 discounted charging for the first hour to attract customers, while a library may charge a fee  
4 for all charging sessions to ensure they recover the cost of electricity. Some site hosts might  
5 prefer a flat fee or a per-minute fee, while others may prefer a per-kWh price. Site hosts  
6 should be free to set prices and change prices as they see fit to support their goals. I also  
7 recommend that site hosts be the utility customer-of-record and be responsible for paying  
8 the regular bills associated with the electricity used for charging services through standard  
9 tariffs. This ensures the utility remains whole for any costs related to the electricity used  
10 by the charging stations while allowing the site host flexibility to price the charging  
11 services in accordance with its own goals. Further, this will encourage site hosts to  
12 maximize station utilization through signage, parking enforcement, maintenance, and  
13 pricing.

14 If the Commission decides to approve UGI Electric’s pilot as proposed, we urge  
15 the Commission to clarify that the issues identified by ChargePoint, namely, the  
16 importance of site host choice of EV charging hardware and software and the ability for  
17 site hosts to establish pricing for EV charging services, would need to be incorporated into  
18 any subsequent pilots and programs.

19 **Q: What do you recommend?**

20 A: I recommend that the Commission approve UGI Electric’s proposal to own EV chargers at  
21 three sites but direct UGI Electric to allow site hosts at these locations to choose the EV  
22 charging hardware and network service provider and to set the prices paid by drivers.

1 **IV. Conclusion and Recommendations**

2 **Q: Please summarize your recommendations for the Commission.**

3 A: I recommend that the Commission:

- 4 • Approve UGI Electric’s proposal to invest in, own, and maintain make-ready  
5 infrastructure needed to support customer-owned EV charging stations, and direct UGI  
6 Electric to require EV chargers deployed through the program to be smart or  
7 networked, ENERGY STAR certified, and tested for safety by a national testing  
8 laboratory such as UL;
- 9 • Direct UGI Electric to allow site hosts to choose the EV charging station equipment  
10 and network service provider for EV charging station locations at which UGI Electric  
11 has proposed to own chargers, and to allow site hosts to set prices to drivers.

12 **Q: Does this conclude your testimony at this time?**

13 A: Yes.



## MATTHEW DEAL

### PROFESSIONAL EXPERIENCE

#### ChargePoint, Inc

##### Manager, Utility Policy

2020 – Present

Lead the development and execution of ChargePoint's regulatory strategies to promote electric vehicle charging solutions for site hosts, businesses, utilities and electric vehicle drivers.

#### SIERRA CLUB

##### Clean Energy Program Manager

2019 – 2020

Responsible for implementation of approved clean energy objectives through the design and implementation of campaign strategies for the N.C. Chapter. Work with N.C. Sierra Club local groups around the state on campaigns related to clean energy. Represent the Sierra Club to partner organizations, the media, policymakers and executive branch agencies.

#### EXELON

##### Senior Manager, Strategic Environmental Initiatives

2013 – 2017

Led renewable policy and supported commercial development activities. Tracked and analyzed renewable/environmental intelligence nationwide for internal stakeholders, including solar, wind, efficiency, load response and origination.

##### Manager, Policy Analysis

2011 – 2013

Analyzed corporate policy positions on federal, state, retail and wholesale market issues.

#### CALIFORNIA PUBLIC UTILITIES COMMISSION, San Francisco, CA

##### Director, Policy and Planning Division

2010 – 2011

Developed independent research on comprehensive long and medium-term regulatory strategies. Represented Commission programs & policies at Legislature, Governor's office, national policy forums and conferences.

##### Advisor, Office of the President

2007 – 2010

Facilitated success of gubernatorial appointee working in high-stakes, fast-paced political environment by counseling Commission President on major state-wide initiatives, including resource adequacy, long-term procurement, wholesale market structure, smart grid, demand response, renewable portfolio standards, transmission, greenhouse gas reductions and retail market design.

##### Senior Analyst

2006 – 2007

Provided technical research and analysis on electric procurement, including resource adequacy, long-term planning, compliance, load forecasting and risk mitigation.

#### FEDERAL ENERGY REGULATORY COMMISSION, Washington, DC

##### Energy Analyst

2002 – 2006

Provided expert consultation to Commissioners and top management on energy policy issues. Served as Energy Specialist on demand response, California wholesale market design and renewable energy issues.

### EDUCATION

#### Master of Science (MS), Economics (2002)

Illinois State University, Normal, IL

#### Bachelor of Science (BS), Economics (2000)

Illinois State University, Normal, IL

### PUBLICATIONS

*Electric Energy Storage: An Assessment of Potential Barriers and Opportunities*. July 2010. Available at <https://jointventure.org/images/stories/pdf/cpuc.storagewhitepaper7910.pdf>

*Assessing the State of Wind Energy in Wholesale Electricity Markets*. November 2004. Available at <https://www.ferc.gov/sites/default/files/2020-05/11-04-wind-report.pdf>

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	<b>:</b>	
<b>v.</b>	<b>:</b>	<b>R-2021-3023618</b>
<b>UGI Utilities, Inc. – Electric Division</b>	<b>:</b>	

**REBUTTAL TESTIMONY  
OF  
MATTHEW DEAL  
ON BEHALF OF  
CHARGEPOINT, INC.**

**ChargePoint Statement No. 2**

**May 27, 2021**

1        **I. Introduction and Summary of Recommendations.**

2        **Q: Please state your name.**

3        A: My name is Matthew Deal.

4        **Q: By whom are you employed and in what position?**

5        A: I am Manager of Utility Policy at ChargePoint, Inc (ChargePoint).

6        **Q: Are you the same Matthew Deal who submitted Direct Testimony on behalf of**  
7        **ChargePoint in this proceeding on May 3, 2021?**

8        A: Yes, I am.

9        **Q: What is the purpose of your rebuttal testimony?**

10       A: The purpose of my rebuttal testimony is to respond to the Direct Testimony filed by the  
11       Retail Energy Supply Association and NRG Energy, Inc. (RESA/NRG).

12       **Q: Please summarize your positions and recommendations for the Commission.**

13       A: I continue to support the recommendations I made in my Direct Testimony. For  
14       convenience, these recommendations are as follows:

- 15       • Approve UGI Electric’s proposal to invest in, own, and maintain make-ready  
16       infrastructure needed to support customer-owned EV charging stations, and direct UGI  
17       Electric to require EV chargers deployed through the program to be smart or  
18       networked, ENERGY STAR certified, and tested for safety by a national testing  
19       laboratory such as UL;
- 20       • Direct UGI Electric to allow site hosts to choose the EV charging station equipment  
21       and network service provider for EV charging station locations at which UGI Electric  
22       has proposed to own chargers, and to allow site hosts to set prices to drivers.

23       In my Rebuttal Testimony, I further recommend that the Commission:

- 1 • Direct UGI Electric to remove the reference to Tesla in Section 5-m of Supplement No.
- 2 26;
- 3 • Encourage UGI Electric to be expansive in its interpretation and implementation of
- 4 subpart (c) of Section 5-m to allow as many willing EV charging site hosts to participate
- 5 in the make-ready program as possible;
- 6 • Direct UGI Electric to adopt my proposed changes to Section 5-m of Supplement No.
- 7 26.

8 **II. Response to RESA/NRG.**

9 **Q: What will you address in this section of your testimony?**

10 A: In this section of my testimony, I will respond to recommendations made by RESA/NRG  
11 witness Ms. Danita Park.

12 **Q: Ms. Park states that “UGI Electric’s proposed criteria for ‘Qualified EV Charging**  
13 **Stations’ attempts to micro-manage the placement and technology (which is bound to**  
14 **change) utilized for the third-party owned EV charging stations.”<sup>1</sup> How do you**  
15 **respond?**

16 A: I disagree with Ms. Park’s characterization of UGI Electric’s proposed criteria as an  
17 attempt to “micro-manage” third-party deployment of EV charging stations. As  
18 recommended in my Direct Testimony, I believe it is prudent for the utility to establish  
19 certain eligibility requirements for EV charging stations deployed through UGI Electric’s  
20 make-ready program. However, I appreciate Ms. Park raising this issue because I do  
21 believe that not all of UGI Electric’s proposed criteria are necessary and some should be  
22 clarified. I also believe that UGI Electric’s proposal to require Tesla chargers, or any

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<sup>1</sup> RESA and NRG St. No. 2, p. 23, ll. 3-10.

1 proprietary charger, for the make-ready program is not a prudent use of ratepayer funds. In  
2 my rebuttal testimony, I propose some modifications to UGI Electric’s proposed criteria  
3 that I believe will alleviate any concerns that UGI Electric is micro-managing third-party  
4 EV charger deployment and that will improve the program.

5 **Q: How does UGI Electric define “Qualified EV Charging Stations”?**

6 A: Section 5-m of UGI Electric’s proposed Supplement No. 26 states as follows:

7 Qualified EV Charging Stations shall be defined as one (1) to four (4) DC  
8 Fast Charge (“DCFC”) stations of 50kW or greater which are (a) configured  
9 to support SAE/CCS and Tesla plug configurations at a minimum and are  
10 located directly along a major highway and in a commercial retail office,  
11 hotel or shopping location having parking accommodations for not less than  
12 100 vehicles, (b) located in a commercial gasoline retail service station, or  
13 (c) located in another location where the Company, in its sole discretion,  
14 anticipates that adequate public availability and access is being provided.  
15 Installation locations may also be inclusive of one or more adjacent Level  
16 2 charging stations.

17  
18 **Q: Is this definition consistent with UGI Electric’s description of its make-ready  
19 program in witness testimony?**

20 A: Not exactly. UGI Electric’s witness Mr. Taylor stated that its make-ready proposal would  
21 provide for a utility investment allowance “related to the installation of any make-ready  
22 infrastructure associated with Level 2 or DCFC charging stations installed within the UGI  
23 Electric service territory that will be open to the public for use.”<sup>2</sup> While this description  
24 from Mr. Taylor refers to “any make-ready infrastructure,” Section 5-m quoted above  
25 indicates that UGI Electric will only support make-ready infrastructure for specific or  
26 approved installations that include one to four public DCFC chargers. Further, while Mr.  
27 Taylor refers to “Level 2 or DCFC charging stations,” Section 5-m states that installations

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<sup>2</sup> UGI Electric Statement No. 6, p. 40, ll. 3-8.

1 must have DCFC stations to qualify, indicating that site hosts that install only Level 2  
2 chargers would not be eligible for make-ready support.

3 **Q: Please explain your concerns with these criteria.**

4 A: At this early stage of EV adoption, I believe it is reasonable for UGI Electric to support  
5 make-ready infrastructure for any customer that is willing to invest its own capital to host  
6 EV charging stations for public use. (I would also support UGI Electric supporting make-  
7 ready infrastructure for non-public or semi-public charging use cases, such as for fleets,  
8 workplaces, and multi-family housing, but I am not recommending that UGI Electric  
9 expand its program to these segments at this time.) Because site hosts must purchase the  
10 actual chargers themselves, as well as pay for the cost of network services, the expense of  
11 installing DCFCs might put the program out of reach for many site hosts that would  
12 otherwise like to participate by installing Level 2 chargers. Further, DC fast charging is not  
13 needed at many customer locations where EV drivers are likely to remain parked for longer  
14 periods of time or only are topping off their battery. For example, many EV drivers can get  
15 a sufficient charge with a Level 2 charger while parked overnight at a hotel or while parked  
16 for several hours at a movie theater. These sites should be permitted to choose the number  
17 and configuration of DCFC and/or Level 2 chargers that best meet their individual use case.

18 **Q: Based on this concern, what do you recommend?**

19 A: I recommend that the Commission direct UGI Electric to modify Section 5-m to allow site  
20 hosts that install at least four Level 2 charging ports to qualify for make-ready  
21 infrastructure support. I will propose specific modifications to Section 5-m later in my  
22 testimony.

1 **Q: Do you have any other concerns with the criteria in Section 5-m?**

2 A: Yes, I am concerned that the language requires charging station installations “to support  
3 SAE/CCS and Tesla plug configurations.” I do not believe it is appropriate to require  
4 installations to include Tesla plugs and this requirement is likely to undermine the success  
5 of the program. UGI Electric’s make-ready program should incentivize the deployment of  
6 non-proprietary charging plugs, which will ensure that all DCFCs supported by the  
7 program can charge all EVs on the road.

8 **Q: Why do you believe it is not appropriate to require Tesla plugs?**

9 A: Tesla chargers use a proprietary plug type that can only be used by drivers of Tesla  
10 vehicles. By contrast, SAE/CCS is an open standard and SAE/CCS plugs can be used by  
11 any EV from one of the North American or European automakers (including Tesla  
12 vehicles, if the driver has an adapter). The other open standard plug type is known as  
13 CHAdeMO, used by some Asian automakers, but UGI Electric’s tariff does not mention  
14 it.

15 Public EV charging stations that offer open standard plug types encourage EV  
16 adoption generally, because any EV driver can use them (including any Tesla driver who  
17 purchases an adapter). By contrast, Tesla chargers only encourage purchases of Tesla  
18 vehicles. I do not believe it is appropriate for UGI Electric to invest ratepayer funds to  
19 benefit a single company.

20 Further, Tesla owns and operates all of its DCFCs, known as Superchargers. Site  
21 hosts cannot simply purchase and install Tesla chargers on their property (as they can with  
22 ChargePoint chargers, for example, as well as many other charging providers). Rather, site  
23 hosts must request that Tesla install chargers on their property. If site hosts were required

1 to provide Tesla plugs to qualify for UGI Electric's program, it would effectively give  
2 Tesla control over which site hosts could participate in UGI Electric's program. I believe  
3 it would be very imprudent and impractical to give a private company an effective veto  
4 over which EV charging station installations can qualify for UGI Electric's make-ready  
5 program.

6 **Q: Based on this discussion, what do you recommend?**

7 A: I recommend that the Commission direct UGI Electric to strike the reference to Tesla in  
8 Section 5-m. Ratepayer funds should not be used to support chargers with proprietary plug  
9 types that can only be used by one type of vehicle. Alternatively, if the Commission wishes  
10 to allow site hosts that deploy Tesla chargers to receive make-ready support, it should direct  
11 UGI Electric to require that site hosts deploy an equal or greater number of open standard  
12 plug types such as SAE/CCS. For example, if a site host wished to host two Tesla  
13 Superchargers, it should be required to also host two DCFCs with open standard plug types.

14 **Q: Do you have any further comments on UGI Electric's proposed locational**  
15 **requirements based on Ms. Park's concerns that UGI Electric will micro-manage EV**  
16 **charger deployments?**

17 A: I do have some concern that UGI Electric's locational requirements are more prescriptive  
18 than necessary. As I stated earlier, given the current early stage of EV adoption, I believe  
19 UGI Electric should provide make-ready support to any customer willing to host EV  
20 charging stations for public use. I understand that UGI Electric's proposed locational  
21 requirements are designed to ensure that it supports make-ready infrastructure for EV  
22 charging stations that are conveniently located for EV drivers. However, since site hosts  
23 will also need to invest capital to purchase and maintain EV chargers, as well as dedicate



1 valuable parking spots to EV charging, site hosts are unlikely to install EV charging  
2 stations if they do not expect them to be utilized. In other words, I believe that a site host's  
3 own determination that it makes financial sense to host public EV charging stations should  
4 be the only locational criteria for the make-ready program.

5 While ChargePoint would typically recommend removing all geographic-based  
6 restrictions from a make-ready program like UGI Electric has proposed, given that this is  
7 a new activity for UGI Electric and that UGI Electric is a relatively small utility, I am not  
8 recommending any changes to Section 5-m with respect to locational requirements at this  
9 time. Instead, I recommend that the Commission encourage UGI Electric to be expansive  
10 in its interpretation and implementation of subpart (c), which allows UGI Electric in its  
11 discretion to approve site hosts for participation in the program if they do not meet the  
12 locational requirements in subparts (a) and (b).

13 **Q: Do you have any further recommendations with respect to Section 5-m?**

14 **A:** Yes. Consistent with my recommendations in my Direct Testimony, I recommend that the  
15 Commission direct UGI Electric to establish minimum technical standards for all EV  
16 chargers deployed with support from UGI Electric's make-ready program. Specifically, all  
17 EV chargers should be smart or networked, tested for safety by a national testing laboratory  
18 such as UL, and all Level 2 chargers should be ENERGY STAR certified.<sup>3</sup> Smart chargers  
19 will be vital to ensuring that EV charging benefits the distribution grid by enabling UGI  
20 Electric and third-parties to have advanced load management capabilities to facilitate off-  
21 peak charging and other managed charging strategies. A smart charger can also collect  
22 interval data to inform usage patterns, and provide enhanced network communication

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<sup>3</sup> ENERGY STAR certification is currently only available for Level 2 chargers.

1 capabilities between the EV driver and the utility, or third-party systems. These capabilities  
2 can be of significant importance to customers to enable charging, as well as to utilities and  
3 third-party providers since the smart station provides a wealth of information related to  
4 charging behaviors and load profiles.

5 I recognize that UGI Electric has not proposed managed charging programs in this  
6 application, however, requiring smart charger capabilities now will future-proof  
7 investment in EV charging infrastructure. By requiring smart chargers from the outset, the  
8 Commission and UGI Electric will enable the Company, third-party providers, vendors,  
9 and customers to reap significant benefits from increased functionality and wider future  
10 program design options.

11 **Q: Based on this discussion, do you recommend any modifications to Section 5-m of**  
12 **Supplement No. 26?**

13 A: Yes. Again, I appreciate Ms. Park raising her concerns and the opportunity to provide these  
14 recommended improvements and clarifications to Section 5-m. Based on my discussion, I  
15 recommend that the Commission direct UGI Electric to modify Section 5-m to read as  
16 follows:

17 Qualified EV Charging Stations shall be defined as one (1) to four (4) DC  
18 Fast Charge (“DCFC”) stations of 50kW or greater or at least four (4) Level  
19 2 charging stations, which are (a) configured to support SAE/CCS and Tesla  
20 plug configurations (for DCFC stations) or J1772 plugs (for Level 2) at a  
21 minimum and are located directly along a major highway and in a  
22 commercial retail office, hotel or shopping location having parking  
23 accommodations for not less than 100 vehicles, (b) located in a commercial  
24 gasoline retail service station, or (c) located in another location where the  
25 Company, in its sole discretion, anticipates that adequate public availability  
26 and access is being provided. Installation locations may also be inclusive of  
27 one or more adjacent Level 2 charging stations. All chargers must have  
28 smart or network capabilities and be tested for safety by a national testing  
29 laboratory such as UL. Level 2 chargers must be ENERGY STAR certified.

1 **III. Conclusion and Recommendations**

2 **Q: Please summarize your recommendations for the Commission.**

3 A: I continue to support the recommendations I made in my Direct Testimony. For  
4 convenience, these recommendations are as follows:

- 5 • Approve UGI Electric’s proposal to invest in, own, and maintain make-ready  
6 infrastructure needed to support customer-owned EV charging stations, and direct UGI  
7 Electric to require EV chargers deployed through the program to be smart or  
8 networked, ENERGY STAR certified, and tested for safety by a national testing  
9 laboratory such as UL;
- 10 • Direct UGI Electric to allow site hosts to choose the EV charging station equipment  
11 and network service provider for EV charging station locations at which UGI Electric  
12 has proposed to own chargers, and to allow site hosts to set prices to drivers.

13 In my Rebuttal Testimony, I further recommend that the Commission:

- 14 • Direct UGI Electric to remove the reference to Tesla in Section 5-m of Supplement No.  
15 26;
- 16 • Encourage UGI Electric to be expansive in its interpretation and implementation of  
17 subpart (c) of Section 5-m to allow as many willing EV charging site hosts to participate  
18 in the make-ready program as possible;
- 19 • Direct UGI Electric to adopt my proposed changes to Section 5-m of Supplement No.  
20 26.

21 **Q: Does this conclude your testimony at this time?**

22 A: Yes.