

Tori L. Giesler, Esq.
(610) 921-6658
(330) 315-9263 (Fax)

April 11, 2022

VIA ELECTRONIC FILING

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

**Re: Petition to Initiate a Proceeding to Consider Issuance of a Policy Statement on
Electric Utility Rate Design for Electric Vehicle Charging
Docket No. P-2022-3030743**

Dear Secretary Chiavetta:

Pursuant to the Secretarial Letter issued by the Pennsylvania Public Utility Commission (“Commission”) on February 25, 2022 in the above-captioned proceeding, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the “Companies”) offer these letter comments in response to the call for input as to whether the Commission should initiate a proceeding and, if so, the scope of any such proceeding, as set forth by the February 25, 2022 Secretarial Letter.

As filed by ChargeVC-PA on February 4, 2022, the petition at the above-referenced docket proposed initiation of a generic proceeding through which the Commission would establish a policy statement focused on the establishment of electric rate structures that would further encourage the expansion of electric vehicle (“EV”) adoption in Pennsylvania. Included within the petition was a proposal with respect to the procedure to be followed to get to the end-state goal of that policy statement, including a number of suggested questions to be posed.

The Companies support the petition’s goal of spurring conversation around this important topic for electric distribution utilities, their customers, and the Pennsylvania public at large, particularly as the expansion of such technology continues to grow. As such, they stand ready to participate in all aspects of any generic proceeding to address rate design and other topics that would fall within the confines of such a proceeding. While the Companies generally do not oppose the proposed steps in that process as outlined by ChargeVC-PA, the Companies do recommend that any efforts that the Commission may undertake recognize and account for the efforts that may already be underway by other agencies, and the impacts those efforts may have to utility operations and the topics being discussed. Further, it is suggested that an opportunity for an open forum to exchange ideas on a more informal basis prior to a policy statement being finalized would be valuable given the novelty of this topic in Pennsylvania.

Finally, the ChargeVC-PA petition correctly recognizes the importance of discussions around rate design given the predicted expansion of EV. Given expectations of increased saturation of EV deployment and adoption, the Companies note that there may be further topics that are appropriate for discussion before the Commission as this topic advances. The Companies stand ready and look forward to participating in all such conversations at the appropriate time.

The Companies appreciate the opportunity to provide input on such an important issue. Should you have any additional questions or concerns, please do not hesitate to contact me.

Very truly yours,



Tori L. Giesler

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition to Initiate a Proceeding to :
Consider Issuance of a Policy Statement on : **Docket No. P-2022-3030743**
Electric Utility Rate Design for Electric :
Vehicle Charging :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail, as follows:

Steven Gray
Teresa Wagner
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
teresawagne@pa.gov

Michael S. Swerling, Esq.
Timothy K. McHugh, Esq.
UGI Corporation
460 N. Gulph Road
King of Prussia, PA 19406
SwerlingM@ugicorp.com
MchughT@ugicorp.com

Patrick Cicero, Esq.
Aron J. Beatty, Esq.
Harrison W. Breitman, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place - 5th Floor
Harrisburg, PA 17101-1921
pcicero@paoca.org
ABeatty@paoca.org
HBreitman@paoca.org

Richard Webster, Esq.
Jacqueline Golden, Esq.
Richard Schlessinger, Esq.
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
Dick.webster@peco-energy.com
Jacqueline.golden@peco-energy.com
Rich.schlessinger@peco-energy.com

Michael Zimmerman, Esq.
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
mzimmerman@duqlight.com

Brendon J. Baatz
Officer-ChargEVC-PA
Vice President-Gabel Associates
2001 Market Street, Suite 2500
Philadelphia, PA 19103
brendon@gableassociates.com

Kimberly A. Klock, Esq.
Michael J. Shafer, Esq.
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com

Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Lauren N. Berman, Esq.
Ria M. Pereira, Esq.
Pennsylvania Public Utility Law Project
CAUSE-PA
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org

Leah Meredith
Policy Principal
Advanced Energy Economy
lmeredith@ae.net

Paul R. Bonney, Esq.
Counsel to ChargEVC-PA
409 Holly Lane
Wynnewood, PA 19096
Bonney.paul.r@gmail.com

Susan E. Bruce, Esq.
Charis Mincavage, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
sbruce@mcneeslaw.com
cmincavage@mcneeslaw.com


Donna M.J. Clark, Esq.
Energy Association of Pennsylvania
800 North Third Street
Suite 205
Harrisburg, PA 17102
dclark@energypa.org

Philip B. Jones, Executive Director
Alliance for Transportation Electrification
1402 Third Avenue, Suite 1315
Seattle, WA 98101
phil@evtransportationalliance.org

Pamela C. Polacek
C&T Enterprise, Inc.
P.O. Box 129
Venetia, PA 15367
ppolacek@ctenterprises.org

Counsel to Citizens' Electric Company of
Lewisburg, PA, and Wellsboro Electric
Company

Dated: April 11, 2022



Tori L. Giesler
Attorney No. 207742
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6658
tgiesler@firstenergycorp.com