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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
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January 22, 2024

Chairwoman Gladys Brown Dutrieuille
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Third Floor
Harrisburg, PA 17120

RE: Comment on proposed Electric Vehicle Rate Design Policy Statement
Docket M-2023-3040755

Dear Chairwoman Dutrieuille,

Thank you for the opportunity to comment on the proposed Policy Statement regarding Electric Utility Rate Design for Electric Vehicle Charging.

Electric vehicles (EVs) have the potential to play a key role in reducing carbon emissions, and Pennsylvania must act now to set forth overall policies for electric distribution companies (EDCs) to follow as they develop rate structures for EV charging.

The proposed policy statement is a good first step, and I have just a few suggestions to strengthen it further. Specifically:

- The policy should require EDCs to regularly report specific metrics such as number of EV customers, customer load profiles, monthly average energy and peak demand associated with EVs and cost to integrate EVs into the grid.
- Provision should be made for EV-only rates, including reducing or eliminating the customer charge for second meters and exploring submetering to lower costs.
- Under “§69.3553. Electric Vehicle Charging Rate Design,” replace phrasing such as, “should consider,” “may include,” and “should take into consideration” with stronger language that reflects the urgency and necessity of developing EV rate structures.

Additionally, I encourage PUC to analyze commercial and industrial EV rates to determine whether modifications are needed to support greater investment in the public charging services market.

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I look forward to further conversation and development of this emerging segment of our commonwealth's efforts to reduce carbon emissions and transition to a clean-energy future.

Thank you again for the opportunity to submit comments on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Danielle Friel Otten". The signature is written in a cursive style.

Danielle Friel Otten
State Representative
155th Legislative District