

February 23, 2022

P-2022-3030743-AEL-2/25/22

RE: Letter of support on the ChargeVC PA petition before the Pennsylvania Public Utility Commission to issue a policy statement on electric utility rate design for electric vehicle charging.

Dear Chairwoman Brown Dutrieuille, Vice-Chairman Coleman, and Commissioner Yanora:

The Electrification Coalition is a nonpartisan, nonprofit organization that advances policies and actions to facilitate the widespread adoption of plug-in electric vehicles (EVs) in order to overcome the economic, public health, and national security challenges that stem from U.S. oil dependence. The EC is working to accelerate EV adoption across Pennsylvania at the state, city and local levels by educating policymakers on the best practice policies and programs that are needed to prepare for this transition to transportation electrification. As the transportation sector transitions to electrification, Pennsylvania must be ready to support this shift with the right price signals and rate design structure that supports the new demand and efficient use of electric grid assets. Therefore, the EC supports the petition requesting that the Public Utility Commission (PUC) initiate a proceeding that will result in a policy statement on electric utility rate design for electric vehicle (EV) charging in Pennsylvania.

A proceeding and policy statement on electric utility rate design for EV charging is beneficial to the state for several reasons. First, with numbers of EVs plugging into the grid on the rise for both the light-duty as well as medium- and heavy-duty sectors, there is opportunity for utilities to enhance the rate design to benefit all and ensure that EVs are charging at night and mostly at off-peak times. **EVs hold the potential to reduce electric rates for all ratepayers, as the increased use in electricity spreads the cost of the grid assets across a broader group of end-users – particularly at times when the grid is underutilized.**

Second, a proceeding from the PUC on EV rate design for charging signals to the federal government that PA is serious about an equitable and efficient shift to transportation electrification. The Bipartisan Infrastructure Law includes several key investments in EV charging for Pennsylvania, including \$171 million over a five-year period to support the development of an EV charging network along highway corridors. Pennsylvania will also have the opportunity to apply for the \$2.5 billion of competitive grant funding dedicated to EV charging infrastructure investments, as well as the \$2.5 billion available specifically for electric school buses. The state plan to utilize the \$171 million must account for how the EV charging infrastructure will provide power for EV charging in a manner that supports “a robust and reliable network”, achieves a high-level of reliability, mitigates adverse impacts to the electric grid, minimizes demand charges or other fixed utility fees and provides high speed (i.e. high power) charging. **A successful state plan in PA and successful grant applications for the \$2.5 billion funding pot depend on the guidance and direction from the PA PUC – particularly in terms of EV rates and rate design.**

Furthermore, under section 40431 of the Bipartisan Infrastructure law, states are required to consider opportunities to promote transportation electrification, including rate design that encourages affordable and equitable EV charging options. We urge the PA PUC to show strong and bold leadership as the state transitions to transportation electrification by facilitating a proceeding that results in a



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policy statement on electric utility rate design for EV charging. As our current state of affairs with Russia and China indicates, it is absolutely critical that the U.S. shift to EVs powered by electricity generated here in the U.S., including in PA, in order to secure our energy and national security. Again, we urge the PA PUC to initiate a proceeding that will result in a policy statement on EV rate design for charging as outlined in the ChargeVC petition.

We look forward to working with you. For any questions, please contact Celia Kosinski at ckosinski@electrificationcoalition.org.

Sincerely,

A handwritten signature in cursive script that reads 'Ben Prochazka'.

Benjamin Prochazka
Executive Director