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**Letter of Support on the ChargeVC PA petition before the Pennsylvania Public Utility Commission
Docket No. P-2022-3030743
February 24, 2022**

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

Advanced Energy Economy (AEE) appreciates the opportunity to file a letter of support on the ChargeVC PA petition before the Pennsylvania Public Utility Commission (PUC). AEE strongly supports the petition requesting that the PUC initiate a proceeding that will result in a policy statement on electric utility rate design for electric vehicle (EV) charging in Pennsylvania. We further urge the PUC to use this opportunity to confirm the agency's established ability to regulate energy policies, which extends to EV-specific rates and programs in the Commonwealth.

AEE is a national association of businesses that are making the energy we use secure, clean, and affordable. We work to accelerate the move to 100% clean energy and electrified transportation in the U.S. Advanced energy encompasses a broad range of products and services that constitute the best available technologies for meeting our energy needs today and tomorrow. These include energy efficiency, demand response, energy storage, solar, wind, hydro, nuclear, electric vehicles, biofuels and smart grid. AEE represents more than 100 companies in the \$238 billion U.S. advanced energy industry, which employs 3.2 million U.S. workers.

This is a critical point in time for this conversation. An historic investment of \$7.5 billion in federal funds for EV charging is on its way, headed for the states. This federal funding, from the Infrastructure Investment and Jobs Act (IIJA) passed by Congress and signed into law in November, will make it easier for policymakers in Pennsylvania to accelerate the electric transportation (ET) transition and meet the state's national ambient air quality standards. It will also pave the way for further growth of the more than 15,000 EV-related businesses in the U.S. Even at this early stage in the market's history, ET accounts for [nearly 4,400 jobs across Pennsylvania](#). ET jobs are already projected to grow faster than the overall economy and Pennsylvania can reasonably expect the industry to grow exponentially as a result of this federal investment—but only if coupled with wise in-state planning.

As outlined in AEE's [Implementation Roadmap](#) for states, IIJA funding is set to flow from two buckets: \$2.5 billion in discretionary grant funding through Charging and Fueling Infrastructure, and formula funding through the National Electric Vehicle Formula Program, which includes \$171 million for Pennsylvania over a five-year period to support the development of an EV charging network along highway corridors. In short, every state will get some aid, but with a good plan in place, Pennsylvania will have the chance to make bigger investments with additional federal dollars. Nationally, the Federal Highway Administration is already soliciting feedback on how to distribute these billions of dollars, but your leadership is equally critical for optimizing the benefits of federal dollars. The IIJA also requires states to consider opportunities to promote transportation electrification, including rate design that encourages affordable and equitable EV charging options.

The IJA provides plenty for states to get started, especially for states that are well prepared and with auto manufacturers preparing to fully electrify their model lines, and so the time for the PUC to act is now. It is within the PUC's purview to direct Pennsylvania's electric utilities to plan for the additional distributed load from ET, and to do so in a way that maximizes ratepayer benefit. With the number of EVs plugging into the grid on the rise, 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.

AEE urges the PUC to initiate a proceeding that will result in long-term guidance on EV rate design for utilities as outlined in the ChargeEVC petition. A proceeding from the PUC on EV rate design for charging would send a signal to the federal government that Pennsylvania is well situated to optimize these funds, thus also making the state a strong candidate for the \$2.5 billion in competitive grant funding for EV charging infrastructure investments. The fact that the ET transition has already begun makes it all the more urgent that the PUC seriously consider the ChargeEVC petition and begin exploring EV-specific utility rate designs.

We look forward to working with you. For any questions, please contact Leah Meredith at lm Meredith@aee.net.

Sincerely,

Leah Meredith

Policy Principal

Advanced Energy Economy