



***Recommendations of  
the Electric Vehicle  
Charging Rate Design  
Working Group***

**March 29, 2023**

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# Recommendation Summary

On February 4, 2022, ChargEVC-PA<sup>1</sup> filed a Petition, at Docket No. P-2022-3030743, requesting that the Public Utility Commission (Commission) initiate a proceeding that would result in issuance of a Policy Statement on electric utility rate design for electric vehicle (EV) charging.

On February 25, 2022, the Commission issued a Secretarial Letter requesting comments addressing whether the PUC should initiate an EV charging rate design policy statement proceeding. The vast majority of the Comments received were supportive of the Commission's consideration of EV charging rate design. A common thread found in the Comments was support for the establishment of an informal process to first explore the issues surrounding EV charging rate design.

To ensure the Commission maintains a nimble posture ahead of the electrification transition, the Commission stated that it is imperative that it research and consider rate designs that advance management of energy and infrastructure costs. As such, on December 1, 2022, the Commission issued an Order that an informal working group be convened to better inform the Commission regarding the rate design options that are best suited for EV charging, and management of the increased load that the EV rollout may place on the electric distribution grid. The Commission further ordered that the recommendations of the informal working group be filed no later than March 31, 2023.

This document provides a summary of the recommendations of the informal working group. There are three main recommendations as given below:

1. The working group recommends that the Commission proceed with drafting a proposed policy statement concerning EV charging rate design.

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<sup>1</sup> ChargEVC-PA is a coalition formed to serve as a resource for research and information on, and as an advocate for, advanced EV adoption and market development in Pennsylvania. ChargEVC-PA consists of the following members: Electrification Coalition, Greenlots, Keystone Energy Alliance, Natural Resources Defense Council (NRDC), Plug In America, Sierra Club and Adams Electric Cooperative.

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2. The working group recommends that the proposed policy statement consider the topics contained in the comments informally filed and summarized in this document.
  3. The working group recommends that Commission staff utilize the informal working group, as necessary, when drafting the proposed policy statement for Commission review.

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# Background

On February 4, 2022, ChargeEVC-PA filed a Petition requesting that the Commission initiate a proceeding that would result in the issuance of a Policy Statement on electric utility rate design for electric vehicle (EV) charging in Pennsylvania.

After consideration of the Petition and comments filed, the Commission issued an Order on December 1, 2022, which granted, in part, and denied in part, ChargeEVC-PA's request to initiate a formal policy statement proceeding. The December 1, 2022, Order specifically directed the following:

1. That within thirty days of issuance of the Order, the Bureau of Technical Utility Services convene an electric vehicle charging rate design working group of interested parties to discuss electric vehicle rate design.
2. That the recommendations of the working group be filed, at Docket No. P-2022-3030743, no later than March 31, 2023.
3. That the Bureau of Technical Utility Services (TUS) in conjunction with the Law Bureau prepare an order considering ChargeEVC-PA's request for a Policy Statement and the working group's recommendations relative to electric vehicle rate design by June 1, 2023.

On December 21, 2022, the Commission issued a Secretarial Letter which established and convened an EV Charging Rate Design Working Group (informal working group) and invited interested parties to provide written comments on the issues presented in the December 1, 2022 Order. The informal working group met on January 25, 2023, and February 16, 2023. Approximately 50 diverse entities were represented at these meetings. During the first working group meeting, Synapse Energy Economics presented a study commissioned by the Department of Environmental Protection's (DEP's) Energy Programs Office that modelled future sales of EVs in Pennsylvania, analyzed the associated potential grid impacts of EV adoptions, and provided recommendations that could benefit consumers and distribution grid companies. The

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second working group meeting included presentations from PECO Energy Company and Duquesne Light Company on rates they currently offer which include EV charging incentives.

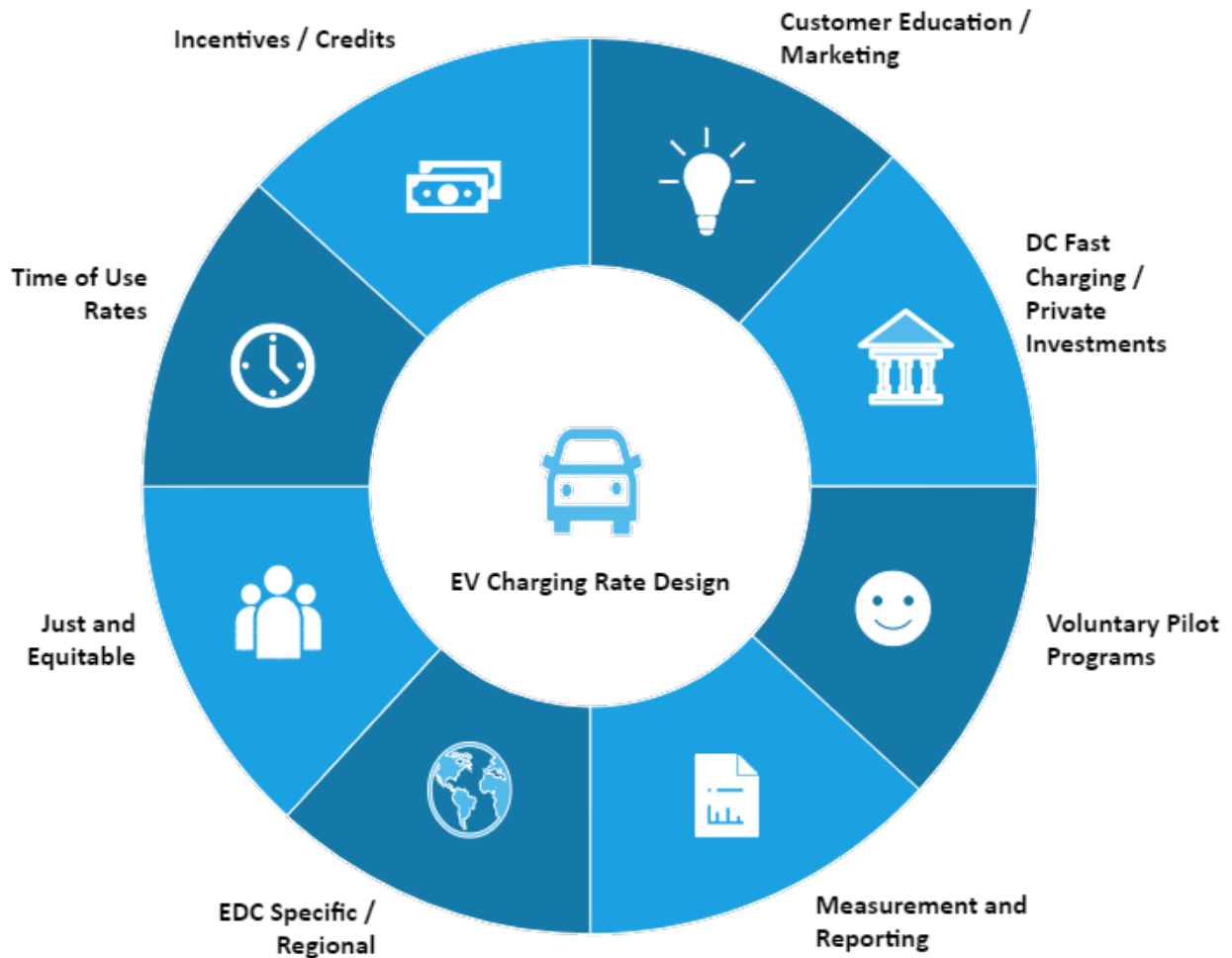
At both meetings, Commission staff requested that working group members provide oral and written informal comments addressing the questions posed in the Commission's Order and their respective positions on the potential creation of an EV rates design policy statement. Commission staff requested that those in favor of a policy statement provide a discussion of topics to potentially be covered in the policy statement. Commission staff noted that since the working group is informal, all comments should be submitted directly to staff, noting that all comments and meeting materials would be posted publicly to the Commission's [EV web page](#).

Staff received informal comments from twenty three informal working group participants: Alliance for Transportation Electrification (ATE); Advanced Energy United (United); Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA); ChargeVC-PA; Electrify America; FirstEnergy Corporation (FirstEnergy); Duquesne Light Company (DLC); Office of Consumer Advocate (OCA); PECO Energy Company (PECO); joint comments by Pennsylvania Petroleum Association, GetGo™ Cafe + Market / Giant Eagle, Inc. (GetGo), Glassmere Fuel Service (Glassmere Fuel), Onvo (Onvo), Sheetz, Inc. (Sheetz), Wawa, Inc. (Wawa); Pennsylvania Energy Consumer Alliance, Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, Philadelphia Area Industrial Energy Users Group, and PP&L Industrial Customer Alliance, West Penn Power Industrial Intervenors (collectively, Large Customer Groups); PPL Electric Utilities (PPL); UGI Corporation (UGI); Joint comments by Electrify America, ChargePoint, EVgo, Tesla; WeaveGrid; the Natural Resources Defense Council, Pennsylvania Department of Transportation (PennDOT), and CALSTART.

The following summary of comments are responsive to the questions posed in the Commission's order even if they are not attributed to the specific enumerated questions. Some of the commentators provided direct responses to the questions. Those along with other comments may be viewed by accessing the Commission's [EV web page](#).

# Summary of comments received from the working group:

## EV Charging Rate Design Comments Key topics



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The informal comments and recommendations from various participants in the EV Charging Rate Design Working Group are summarized in the remainder of this document. The full text of the informal comments can be viewed on the Commission’s website at the [EV web page](#).

It is the recommendation of the informal working group that these informal comments be considered in the potential drafting of an EV rate structure policy statement.

Please note that this is a summary of submitted informal comments and is not intended to state or imply agreement or consensus among all informal working group participants regarding individual comments.

- 1. EV rates should be Electric Distribution Company (EDC) specific, should allow for regional flexibility, and avoid cross-subsidization. (OCA, ChargeVC-PA, DLC, First Energy, UGI, PECO, Large Customer Groups, United, WeaveGrid, CAUSE-PA)**

As each EDC service territory has its own unique demographics and load characteristics, a one-size-fits-all approach to EV rate design in Pennsylvania is unreasonable and inappropriate. EV rate design should be utility-specific and designed specifically to each utility’s load and cost characteristics in every base rate case proceeding.

Jurisdictional electric distribution companies that wish to implement EV specific rates should propose specific tariff language to provide rate design options for electric vehicle charging for its residential, commercial, and industrial customers, including the host sites (utility customers) who either operate or lease public charging stations.

Individual EDCs should therefore have the freedom to design and implement rates based on the various factors unique to their respective operating areas.

EV rates should be designed in a manner to avoid unreasonable cross-subsidization between customers. Some commenters expressed that ratepayers who do not own EVs should not be required to subsidize EV charging rates. For example, a low-income



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ratepayer that does not own an EV should not have to pay the costs associated with a more affluent ratepayer's EV. EV rates should follow established ratemaking principles to avoid subsidization between rate classes (i.e. residential, commercial, industrial).

- 2. An EV rate design policy statement should provide a framework and general guidance to aid EDCs in developing EV charging rate designs and tariffs. (DLC, First Energy, PPL, PECO, CALSTART)**

To further support the EDC flexibility advocated by stakeholders in Comment 1, an EV charging rate design policy statement should refrain from setting artificial time-based deadlines or minimum filing requirements that are more prescriptive than those required for any other utility rate design proposal.

- 3. The Commission's Policy Statement should include a request that all Pennsylvania electric distribution companies file proposed EV-specific rates by December 31, 2023. (ChargEVC, ATE, NRDC)**

Time is of the essence to get in place utility EV charging rates across Pennsylvania, given the expected high load growth from EV adoption and the utility capital costs that will be required to build out the grid to accommodate that load growth, but that can be avoided if off-peak EV charging is properly encouraged. As such, the Commission's Policy Statement should include a request that all Pennsylvania EDCs file proposed EV-specific rates by December 31, 2023, either as part of a base rate case filing or as a separate tariff filing.

- 4. Should the Commission adopt a mandatory rate design for EVs that relies upon smart meter technology, the Commission should affirm that smaller EDCs without such metering technology are exempt from that requirement. (UGI)**

Pursuant to Section 2807(f)(6) of the Public Utility Code, 66 Pa.C.S. § 2807(f)(6), EDCs with 100,000 customers or less are not required to implement or utilize smart meter



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technology. The lack of smart meter technology for smaller EDCs should be considered as part of the overall consideration of certain rate design implementations (i.e., Time of Use rates). Should the Commission adopt a mandatory rate design for EVs that relies upon smart meter technology, then the Commission should affirm that smaller EDCs without such metering technology are exempt from that requirement. To the extent that the Commission encourages voluntary rate designs that rely on smart meter technology, the Commission should similarly note that smaller EDCs are not expected to make such proposals.

- 5. The Commission should support the creation of EDC EV charger interconnection standards and protocols that support the transfer of data and information between EV chargers and the EDC.  
(PPL)**

The first Commission objective in adopting an EV policy statement should be to support an EDC's foundational responsibility to provide safe and reliable service. It is important to understand the demands EV charging will place on the grid as more customers and other third-party stakeholders seek to interconnect EV chargers. The Commission should support the creation of EDC EV charger interconnection standards and protocols that support the transfer of data and information between EV chargers and the EDC. Having EV charger-specific data will enable the utility to perform cost-of-service studies and create rates and incentives that best support the customer groups for which they are being designed.

- 6. Policy Statements should include language that permits EDCs to gather data needed for analysis and allow the EDCs the flexibility of using existing or leveraging new and improved technologies to accomplish this.  
(PPL, PECO)**

EDCs require detailed EV charger data to use when designing rates that effectively respond to policy goals and customer needs. To address this need, the Commission Policy Statement should include language that permits EDCs to gather data needed for analysis, including, but not limited to, the number of chargers, details behind the type

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of chargers, and understanding where the chargers are interconnected to the utility's system; what costs are associated with EV chargers; and access to charger usage patterns. This information will directly inform the cost-of-service studies and rate design completed by EDCs when building an EV-only rate. The policy statement should include provisions for removing potential logistical and cost-related barriers to collecting this data.

**7. EV rates should be voluntary, and the policy statement should allow for programs to be initially designed as pilots with ongoing stakeholder engagement and reporting requirements specific to each pilot program. (DLC, OCA, First Energy, WeaveGrid, CAUSE-PA)**

As EDC-specific data is necessary to determine a proper EV charging rate design, it may be appropriate for rates to be initially designed as pilot programs with specific reporting requirements applicable to each individual pilot program. While the Commission should establish overarching standards and guidelines for critical program elements, each pilot should be designed to serve local needs. Data should be gathered to inform all interested stakeholders of the best approach to EV rate design for each specific EDC.

Participation in pilot programs for EV charging rate design should be voluntary, with the ability to withdraw from or seek to amend the EV rate design pilot program based on customer experience and data-driven outcomes. All pilot programs should be opt-in, with a periodic renewal option presented to the ratepayers. However, to avoid the possibility of gamesmanship regarding rates, consumers and hosts of EV charging equipment who opt-out should not be permitted to re-enter the pilot during the same 12-month period. Given the evolving nature of EV adoption in Pennsylvania, implementing an EV rate design without a pilot program is unreasonable. Pilot programs should be a stakeholder-driven process with specific data and evaluation protocols.

It is also important to consider a variety of key variables that are currently unknown in Pennsylvania such as opt-in rates, retention rates, usage profiles under the pilot rate or program, EV penetration, and impact on the distribution system.

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**8. Recommendations to limit these rates to pilots would undermine customer adoption and should be rejected.**

**(NRDC)**

NRDC expressed concerns with the manner in which EV charging rate pilots may be developed and deployed. Specifically, NRDC stated that limiting EV rates to pilot programs, with restricted eligibility and program duration, would significantly undermine adoption of these rates and EV sales in the state. NRDC further commented that customers need a reasonable degree of certainty regarding the economics of EV charging (and the continued existence of EV rates altogether) to make significant investments in EVs, and pilot rates will not provide that.

**9. EDCs should be encouraged to explore the use of credits and price signals to incentivize ratepayers to alter behavior in a way to benefit from their usage pattern in relation to EV charging, to simplify the EV ratepayer's experience, and to provide benefit to the grid.**

**(OCA, ChargEVC-PA, United)**

At the first working group meeting, Synapse discussed Con Edison's approach to EV rate design in New York, which utilizes on-bill credits to incentivize non-peak periods of EV charging. According to Synapse, Con Edison's on-bill credit program has been effective in altering EV ratepayer behavior to benefit Con Edison's distribution system and customers. The use of on-bill credits sends a positive price signal to ratepayers and directly incentivizes them to change usage patterns in a manner that is clearly indicated on their bill in an easy-to-understand manner. While a one-size-fits-all approach is not appropriate for all EDCs, incentivizing customers with on-bill credits should be encouraged. To that end, it may be that a credit approach can only be offered to default customers unless an EGS is willing to fully participate in the credit approach.

Electric utilities in Pennsylvania will play a critical role in transportation electrification through a variety of means including ensuring adequate distribution infrastructure is in

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place to serve the electric transportation load, and offering rates to customers that provide price signals to optimize the electric grid. Experience in many states has demonstrated clearly that electricity consumers respond well to price signals and alter behavior in ways beneficial to them as well as the overall grid.

- 10. If Time of Use (TOU) rates are implemented in EV rate design, there needs to be reasonable on-peak, off-peak, and super off-peak periods. There should also be clearly differentiated pricing between on-peak, off-peak, and super off-peak rates.**

**(OCA, ChargEVC-PA, CAUSEPA, United, WeaveGrid, PennDOT)**

Without reasonable time periods and price signals that encourage consumers to charge during off-peak and super off-peak periods, ratepayers are not likely to adjust their usage in an effective manner and any benefit of TOU will be significantly limited. These time periods and rates will likely vary depending on the specific EDC. It should also be considered that even EV owners who sign up for a TOU rate might, at times, have no choice but to charge during peak periods. Some consideration should be given to a “free pass”, so to speak, where brief periods of charging (20-30 minutes), even on peak could be treated as off peak, or at least not be overly punitive.

Any EV rate design policy statement should be specific to EV adopters and should clearly state that any utilization of residential TOU rates must be offered on a voluntary, opt-in basis for EV charging to protect vulnerable residential consumers that lack sufficient discretionary usage to shift usage to off-peak times.

- 11. EDCs, stakeholders, and the Commission should consider if whole-house or separate meter TOU rates are appropriate.**

**(OCA, CAUSE-PA, WeaveGrid, PennDOT)**

The EDC pilot programs should explore whole-house rates and EV specific charging rates, with and without separate metering. In addition, the sub-metering options identified in several other EV rate programs in the presentation by Synapse should be explored. If a sub-metering option is created at some point, any costs involved in

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obtaining/connecting the separate metering equipment should be at the sole expense of the EV owner.

Any utilization of sub-metering for residential home EV charging must be narrowly tailored to EV applications and closely monitored to prevent consumer abuses. Any EV rate design policy statement should include, at minimum, clear guidance regarding the application of Chapter 14 and Chapter 56 to sub-metered accounts, and a statement indicating that sub-metering proposals for EV charging must be limited to that purpose.

## **12. Customer Education and Awareness (First Energy, UGI, Large Customer Groups)**

Education is a critical component of EV charging rate design and, more importantly, greater EV adoption. A public education program should target the public, particularly those currently not participating in EV adoption, by presenting educational materials on various topics, e.g., rate designs related to EV charging and EV charging ownership costs. As such, EDCs should have flexibility to develop education programs and be provided cost recovery for these programs.

The most reasonable source for funding EV education and outreach would be those entities either seeking to expand EV use in Pennsylvania or those entities that would benefit from increased EV use in Pennsylvania. If, however, the Commission finds that customers themselves should bear the costs of their own education and outreach, then because each customer rate class is unique with its own usage characteristics, the costs should be proportionately distributed across each rate class. As a result, some customer classes may require additional education on EV charging rates (e.g., understanding off/on peak rates) while other customer classes may be more familiar with those concepts. In order to ensure that no inter-class subsidization occurs with respect to allocating and collecting the costs for the specific education and outreach required for each customer class, the individual rate classes (e.g., residential, commercial, and industrial) should have separate budgets (with any education and

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outreach efforts tailored to the needs of each such class) to be collected only from the customers within that class.

**13. Ratepayers who own EVs should receive the proper educational material related to their EV rates.  
(OCA, ChargEVC-PA, United, CAUSE-PA)**

Ratepayers should be fully informed regarding any EV charging rates. Utilities should be responsible for distributing information to ratepayers about EV charging rates. EDCs, stakeholders, and the Commission should evaluate any available resources to determine what has been most effective in other states, in terms of getting information to ratepayers, and in terms of making it as understandable as possible.

Customer education and outreach strategies should also highlight different use cases, clarify eligibility requirements, allow for individualized rate comparison, and promote enrollment to take advantage of EV-specific rates.

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- 15. There should be coordination of all interested agencies involved in the implementation of EV charging rates.  
(OCA, ChargEVC-PA, Large Customer Groups, CAUSE-PA)**

At the first working group meeting, there was a discussion regarding overlapping responsibilities between the Commission and PA DEP. In addition to the Commission and PA DEP, any other state agencies involved in the deployment and use of EV chargers or other related EV programming should coordinate their approach. As such, EDCs should strive to coordinate with stakeholders, including relevant state agencies, prior to filings.

- 16. Electric utilities in Pennsylvania should utilize rate design as a tool, along with other technology-based solutions, to manage load growth from electric vehicle charging.  
(ChargEVC-PA, WeaveGrid)**

Electric transportation charging load presents distinctive electric-grid opportunities because of its flexibility. At the same time, load growth in the transportation electrification sector has the potential to be significant.

- 17. A policy statement should include a description of consumer-protection and equity considerations for low- to moderate-income customers.  
(ChargEVC-PA, CAUSE-PA)**



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Any EV rate design policy statement should include an explicit declaration that EV charging rate proposals must be equitable and, as such, must not include intra- or inter-class rate subsidies that could increase electricity costs for low-income Pennsylvanians.

- 18. A policy statement should include a plan for electric distribution company reporting, filed with the Commission, and made public at least annually, on customer enrollment and utilization of EV charging-specific rates. Final reports for pilot programs should include the EDC's recommendations, including the disposition of the pilot program. (ChargEVC-PA, United, CAUSE-PA)**

Such reporting should be based on streamlined and targeted data collection and analysis that provides consistent data for reporting while protecting customer's privacy and commercial issues.

- 19. Several stakeholders agree that a Commission policy statement on EV rate design should recommend that the utilities file proposed tariffs that provide alternatives to demand charges for public DCFC stations, with one stakeholder (ATE) asserting a demand charge alternative should be provided on a temporary basis. (ChargEVC, Pennsylvania Petroleum Association, Electrify America, ChargePoint, EVgo, Tesla, Advanced Energy United, and ATE)**

Several stakeholders inherently recognize that traditional demand charges presently pose significant barriers to the deployment of public DCFC stations in Pennsylvania. The Commission should address the need for demand charge alternatives in a policy statement to facilitate the development of public DCFC charging stations within the state. These stakeholders support the Commission adopting a policy statement that requests EDCs to file these proposals by December 2023, with the exception of one stakeholder (Pennsylvania Petroleum Association) who stayed silent on the timing of such a filing.

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**20. The Commission should explicitly address rate design alternatives to demand rates in a policy statement on EV charging rate design.**

**(Electrify America, ChargePoint, EVgo, United, PennDOT, CALSTART)**

Traditional demand charges pose a significant barrier to sustainable development and operation of public DCFC stations. At a minimum, a policy statement on EV charging rate design should explicitly require the utilities to file rate design alternatives. In addition, a policy statement should ensure that rate design alternatives address demand rates for distribution charges as well as generation and transmission charges. Generation and transmission are presently billed to large commercial customers by some PA utilities based on monthly peak demand or capacity demand. Further, a policy statement should also set out a date by which alternative proposals on demand charges are due. Finally, the policy statement should provide guidance to the utilities on acceptable parameters for rate design alternatives to demand charges.

The resulting rates should meet the following minimum parameters:

1. Result in stable unit costs over a range of load factors.
2. Ensure that charging infrastructure deployment is widespread with equitable access to all current and future EV drivers where feasible.
3. Provide operational cost stability and cost certainty over the long-term.
4. Provide access to demand charge alternatives prior to the start of the applications period for National Electric Vehicle Infrastructure funding within the state, where feasible.

**21. An EV charging rates policy statement should provide guidance on the appropriateness of temporary demand charge limitation strategies for public EV charging.**

**(PECO, ATE, PennDOT)**

Equitable growth in EV adoption is dependent on the availability of public charging sites, particularly in areas where residents lack access to off-street parking. However,

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public charging sites developed in anticipation of future demand growth may initially experience low utilization and thus low electric load factors. In such cases, standard demand charges may serve as an economic barrier to prospective development of public charging sites. On the other hand, equity considerations demand that, in the long run, all types of utility customers, including EV charging owners, pay their fair share of the utility's fully distributed cost of service. Moreover, DCFC demand charges can play a constructive function in disincentivizing localized overbuilding of DCFC stations that would inhibit stations from reaching economically self-sustaining utilization levels.

**22. Ensure that rate design for direct current fast charging (“DCFC” or “fast charging”) stations provides all owners and operators of publicly accessible DCFC stations with the same competitive risks and the same access to fair, competitively neutral electricity rates.**

**(Pennsylvania Petroleum Association, GetGo, Glassmere Fuel, Onvo, Sheetz, Wawa)**

Without a specific rate for EV charging, utility-owned chargers will have an inherent advantage over private businesses. Private companies would effectively have to purchase electricity at retail and sell at retail. Buying and selling at retail is not a viable business plan.

The second related challenge for non-utility charging station owners is the power providers' imposition of demand charges, or exorbitantly high rates, while a fast charger is in use. When utilities are able to impose these charges on private charging station owners, but not on their own chargers it creates an insurmountable competitive disadvantage to private owners. In doing so, this depresses private investment to the detriment of consumers who have come to rely on competitive, transparent pricing for transportation energy. The Commission should require utilities to develop a uniform rate for the sale of electricity that applies to all fast-charging stations within their service territories.

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Fuel retailers further encourage the Commission to require tariffs for the sale of electricity to EV charging providers that utilize alternatives to demand-based rate structures. The Commission should prioritize structures that are designed to be billed on the amount of electricity being used to operate the charging station, rather than unpredictable demand charges. Ultimately, all owners and operators of publicly accessible fast charging stations should operate with the same competitive risks and the same access to wholesale electricity rates on a level playing field. The Commission should develop regulatory policies to support the development of robust competition within Pennsylvania’s EV charging market.

**23. An EV charging rates policy statement should include strategies to encourage private capital investment and engagement in Pennsylvania’s EV fast charging market.**

**(Pennsylvania Petroleum Association, GetGo, Glassmere Fuel, Onvo, Sheetz, Wawa, Large Customer Groups<sup>2</sup>)**

A key challenge for private businesses seeking to enter the EV fast charging market is the threat of electric utilities using ratepayer funds to own and operate chargers. The ability of electric utilities to rate base EV fast chargers comes with insurmountable competitive advantages over the private sector, with limited incentives for innovation and improvements (such as faster charging stations). Against this backdrop, private businesses that would otherwise be eager to invest in charging stations will not consider the stations to be an attractive investment. Indeed, ratepayer funds should not be used when the private sector is prepared and equipped to invest in owning and operating EV chargers.

If an electric utility chooses to own and operate EV charging stations, they should only be able to do so through a separate, non-rate regulated affiliate that cannot be cross subsidized with their regulated business. This approach will ensure the deployment of

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<sup>2</sup> The Large Customer Groups concur with the first two paragraphs in Section 17; however, the Large Customer Groups take no position with respect to the third paragraph.

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DCFCs does not unnecessarily burden electric utility ratepayers while also encouraging private investment and the swift build out of Pennsylvania’s EV fast charging market.

We believe fuel retailers should focus on providing the customer experience that drivers need while electric utilities focus on distributing power and preparing the electric grid for increased EV adoption. To facilitate this, make-ready programs that allow electric utilities to recover the costs of make-ready infrastructure should be encouraged.

**24. The Policy Statement should highlight EV charging rate design options which face existing legal or regulatory barriers to authorization for Pennsylvania. (PECO)**

If Pennsylvania utilities are permitted to own and/or operate charging stations at some point in the future, EV charging rate designs would necessarily have to include charging station ownership and maintenance as part of underlying costs. At present, based on existing state law, the Commission may not have the legal authority to approve any rate design tied to utility ownership of charging stations. The Commission should provide direction on this and other EV rate design options currently facing legal or regulatory barriers in Pennsylvania that prevent the Commission from authorizing them.

**25. The Policy Statement should connect EV charging rate design with the eventual results of the Commission’s ongoing energy storage proceeding at Docket No. M-2020-3022877. (PECO)**

As both EV charging and storage technologies continue to mature, some technologies may incorporate onboard energy storage that could play a substantial role in rate designs for managed charging. Energy storage has the potential to mitigate concerns regarding demand charges, as well as tangentially related rate designs for net metering.