

Lindsay Baxter
Manager, Regulatory and Clean Energy Strategy
lbaxter@duqlight.com
(412) 393-6224



March 1, 2023

VIA ELECTRONIC MAIL

Darren Gill
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
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 P-2022-3030743

Dear Public Utility Commission Staff,

Please find enclosed Duquesne Light Company's informal comments in the above-referenced proceeding.

If you have any questions regarding the information contained in this filing, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "LBQ", is positioned above the typed name of the sender.

Lindsay A. Baxter
Manager, Regulatory and Clean Energy Strategy

Enclosure
Cc: Joseph Sherrick
Tiffany Tran, Esq.
Joseph Cardinale, Esq.



Duquesne Light Company (Duquesne Light or Company) submits these informal comments regarding a policy statement on electric vehicle (EV) rate design. Please note that these comments are narrowly focused on EV rate design, as directed by staff. The Company reserves the right to comment, formally or informally, on other aspects of EV programs and integration in this or any other proceeding. Duquesne Light welcomes the opportunity to file future informal or formal feedback to any policy initiative developing from this proceeding and looks forward to continuing to participate in the Electric Vehicles Rate Design Working Group.

1. A proposed Policy Statement should provide general *guidance* for voluntary electric distribution company (EDC) filings.

The intent of a Policy Statement is generally to provide guidance or to interpret legislation. A Policy Statement in this proceeding should broadly offer guidance to EDCs, should they choose to voluntarily submit an EV rate design for the Commission’s approval.

The Policy Statement should not require a utility to make a filing, but instead should outline considerations, data points, or other information the EDC should include in its filing which the Commission believes will be necessary in its review of an EV rate design submission. Some broad principles might include:

- Supporting EV adoption;
- Encouraging equity in implementation; and
- Ensuring efficient use of the distribution system.

These rate design filings must remain voluntary for the EDCs in order to ensure programs are developed based on each unique utility’s customer needs.

2. A proposed Policy Statement should allow for EDC *flexibility* in rate design development.

While a Policy Statement may provide guidelines in the filing of EV rate designs, it should allow for flexibility across EDCs. Each of Pennsylvania’s EDC service territories is unique with variations in customer demographics, infrastructure, and EV interest. While some uniformity in filings may be reasonable (*e.g.*, inclusion of cost information, projections of customer participation), a one-size-fits-all approach is likely unworkable due to the differences in EV penetration and customer interest across the Commonwealth. For example, PECO Energy Company and Duquesne Light Company have already implemented forms of EV rates to help encourage EV adoption. Therefore, an EV rate for either utility may potentially vary in its design and details compared to one proposed by an EDC that does not already implement an EV program. It benefits all parties involved, especially customers, to allow for flexibility in rate design development to ensure interests are balanced while meeting utility customers’ needs.

3. A proposed Policy Statement should allow for EDC pilot programs.

As previously mentioned, Duquesne Light Company implemented an EV TOU pilot program, beginning in 2021. As discussed at the February 16, 2023 EV Rate Design Working Group meeting, the Company’s pilot has already provided a number of areas for consideration in future design development and for other stakeholders’ consideration, such as use of EV charging rates versus whole-home rates. Pilots provide an opportunity to gather real-world data to inform future program development. Pilots also allow utilities to pivot away from less-successful programs to those that will have the most impact. Even less successful pilots produce value, though, in providing data to EDCs, the Commission, and stakeholders to inform the continued adoption of EVs in Pennsylvania. It should not be *required* that an EDC first implement a pilot, but flexibility in allowing for pilots as an introductory step is beneficial in an area that is ever-changing.