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July 31, 2018

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: *Policy Statement on Third Party Electric Vehicle Charging –  
Resale/Redistribution of Utility Service Tariff Provisions;  
Docket No. M-2017-2604382***

Dear Secretary Chiavetta:

Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, the “Companies”) submit this letter in support in of the Pennsylvania Public Utility Commission’s (hereinafter, “Commission”) Proposed Policy Statement entered May 4, 2018 in the above-referenced proceeding.

The Proposed Policy Statement was issued by the Commission after initially seeking comments from stakeholders as part of Secretarial Letter dated June 15, 2017 regarding the impact of the Public Utility Code and electric distribution company (“EDC”) tariffs on the adoption of electric vehicle (“EV”) charging stations in the Commonwealth. On August 22, 2017, the Companies, along with a number of other stakeholders, submitted comments in response to the Secretarial Letter. The Companies explained that they do not interpret their tariffs as including any barriers to either the adoption of EV charging stations or the resale of electricity at charging stations. EV charging stations do not fit the definition of resell or redistribution of electricity as written in 66 Pa.C.S. § 1313 of the Public Utility Code, and interconnection of such charging stations is not restricted in any way by the Companies’ tariffs.

On May 4, 2018, the Commission issued a Proposed Policy Statement, which is aimed at resolving any regulatory uncertainty associated with EV charging stations. Specifically, the Proposed Policy Statement outlines the Commission’s interpretation that EV charging stations are not subject to 66 Pa.C.S. § 1313 as long as the station is open to the public for the sole purpose of recharging an EV battery. The Proposed Policy Statement recommends that EDCs amend their tariffs to explicitly address the installation of EV charging stations and affirmatively state that 66 Pa.C.S. § 1313 is inapplicable to the stations. In response to comments by the Companies and

others that advance notice of EV charging station installations is imperative for EDCs' distribution planning, the Proposed Policy Statement also suggests that EDCs should amend their tariffs to indicate that installers must notify EDCs before installing a charging station.

Consistent with the Companies' earlier comments, the Companies do not oppose the amendment of their tariffs to affirmatively address the installation of EV charging stations and clarify that there are no regulatory barriers to their installation. Further, the Companies support the Commission's recommendation that EDCs modify their tariffs to state when and how third parties should notify EDCs in advance of installing an EV charging station in order to enable EDCs to evaluate and properly plan for any impacts to their distribution systems.

The Companies commend the Commission for proposing a Policy Statement aimed at promoting the increased adoption of EV charging stations in Pennsylvania. The establishment of explicit tariff language related to EV charging stations, which resolves regulatory uncertainty and ensures EDCs receive sufficient information related to the installations, is an important step to encourage the installation of additional charging stations throughout the Commonwealth.

Very truly yours,



Teresa K. Harrold

c: Scott Thomas, sjthomas@pa.gov  
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As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Policy Statement on Third Party Electric** :  
**Vehicle Charging – Resale/Redistribution** : **Docket No. M-2017-2604382**  
**of Utility Service Tariff Provisions** :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below.

Service by first class mail, as follows:

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Dated: July 31, 2018



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