



An Exelon Company

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JUL 31 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

July 31, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
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:

On May 4, 2018, the Public Utility Commission (“Commission” or “PUC”) published a request for comments regarding the Order on the Proposed Policy Statement on the resale or redistribution of utility electric service tariff provisions in the context of third-party electric vehicle (“EV”) charging. Specifically, the Commission has provided guidance to eliminate regulatory uncertainty faced by third-party EV charging station operators, thereby promoting the construction of EV charging infrastructure in Pennsylvania.

The Proposed Policy Statement clarifies (1) that it is the policy of the Commission that an EV charging facility open to the public for the sole purpose of recharging an EV battery should not be construed as a sale to a residential consumer and (2) that Electric Distribution Companies (“EDCs”) should expressly address EV charging stations in their tariffs. PECO Energy Company’s (“PECO” or the “Company”) is grateful for the work the Commission has done to promote the development of EV infrastructure in the Commonwealth and offers these supportive comments.

PECO agrees that an owner or operator, that is not a public utility, of an electric vehicle charging facility that is open to the public for the sole purpose of recharging an electric vehicle battery should not be construed to be a sale to a residential consumer. Therefore, that EV-charging transaction should not fall under the pricing requirements of 66 Pa. C.S. § 1313 (relating to price upon resale of public utility services).

PECO further agrees that all jurisdictional EDCs should propose tariff revisions to provide clarity as to the rules regarding third-party owned and operated electric vehicle charging stations. PECO agrees that, consistent with the requirements of proposed section 69.3502, EDC tariffs should address at a minimum the clarification about the sale of electricity by third-party

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EV charging station owners and operators as well as notice requirements under which those owners and operators will notify the EDC about intended installations.

Again, PECO appreciates the Commission's efforts to encourage EV expansion in the Commonwealth, and PECO looks forward to being helpful in that regard.

If you have any questions regarding this matter, please call me at 215-841-5777.

Sincerely,



Richard G. Webster, Jr.  
Vice President  
Regulatory Policy & Strategy

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Cc: Office of Consumer Advocate  
Office of Small Business Advocate  
Commission's Bureau of Investigation and Enforcement  
Office of Attorney General – Bureau of Consumer Protection  
Scott Thomas, Assistant Counsel in the Law Bureau  
Joseph Cardinale, Assistant Counsel in the Law Bureau  
Darren Gill, Deputy Director, Bureau of Technical Utility Services

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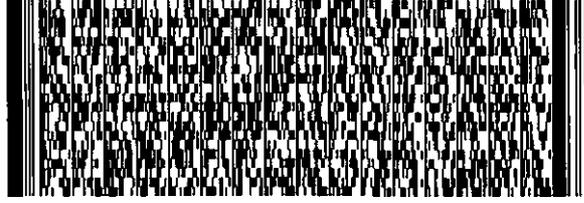
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(717) 772-7777 REF. POLICY STATEMENT EV  
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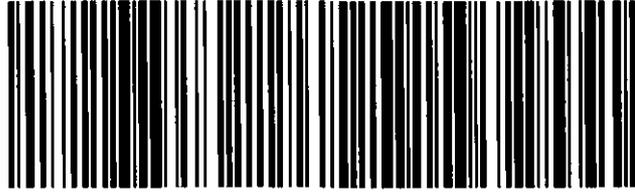


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