

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SURREBUTTAL TESTIMONY OF

DANITA PARK

ON BEHALF OF THE
RETAIL ENERGY SUPPLY ASSOCIATION
AND NRG ENERGY, INC.

Docket No. R-2021-3024601

PECO Energy Company – Electric Division
2021 Base Rate Proceeding

TOPICS:

Electric Vehicle Charging Pilot Proposal
Electric Vehicle DCFC Pilot Rider

August 5, 2021

TABLE OF CONTENTS

I. INTRODUCTION1
II. GENERAL OBSERVATIONS AND SUMMARY OF RECOMMENDATIONS2
III. PECO’S EV CHARGING PILOT7
IV. PECO’S EV-FC PROPOSAL.....15
V. CONCLUSION.....16

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME.**

3 A. Danita Park.

4 **Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?**

5 A. Yes. On June 28, 2021, I submitted direct testimony on behalf of the Retail Energy
6 Supply Association (“RESA”)¹ and NRG Energy, Inc. (“NRG”)² marked as RESA/NRG
7 Statement No. 1. The direct testimony was accompanied by ten (10) exhibits marked as
8 Exhibits DP-1 through DP-10. The direct testimony was revised on July 9, 2021.

9 Additionally, on July 22, 2021, I submitted rebuttal testimony on behalf of RESA and
10 NRG, marked as RESA/NRG Statement No. 1-R and accompanied by six (6) exhibits
11 marked Exhibits DP-11 through DP-16.

12 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

13 A. The purpose of my surrebuttal testimony is to respond to certain PECO rebuttal
14 testimony. My surrebuttal testimony addresses issues regarding PECO Energy Company
15 – Electric Division’s (“PECO” or “Company”) proposed Electric Vehicle Charging Pilot
16 (“EV Charging Pilot”) and its proposal to expand the Electric Vehicle DCFC Pilot Rider
17 (“EV-FC”) to include public transit. In addressing the Company’s proposed EV

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (“RESA”) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

² NRG’s license retail supply companies include: Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business A-2010-2192350; Green Mountain Energy Company A-2011-2229050; Energy Plus Holdings LLC A-2009-2139745; XOOM Energy New Jersey, LLC A-2012-2283821; Stream Energy New Jersey, LLC A-2010-2181867; Direct Energy Services, LLC A-110164; Direct Energy Business, LLC A-110025; Direct Energy Business Marketing, LLC A-2013-2368464; and Gateway Energy Services Corporation A-2009-2137275.

1 Charging Pilot and proposal to expand the EV-FC Pilot Rider, I will respond to the
2 rebuttal testimony of: (1) Jacqueline F. Golden on behalf of PECO (PECO Statement No.
3 9-R); and (2) Richard A. Schlesinger on behalf of PECO (PECO Statement No. 8-R). If I
4 do not address each and every issue or argument in the testimony of a witness, it does not
5 imply agreement with those issues or arguments.

6 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH THIS TESTIMONY?**

7 A. No.

8 **II. GENERAL OBSERVATIONS AND SUMMARY OF RECOMMENDATIONS**

9 **Q. PLEASE DESCRIBE THE PECO PROPOSALS THAT YOU ARE ADDRESSING**
10 **IN THIS TESTIMONY.**

11 A. As part of this base rate proceeding, PECO is proposing to implement the EV Charging
12 Pilot, which consists of three components, including (1) the Transit Charging Program;
13 (2) the Commercial and Industrial Level 2 Charging Program (“L2 Program”); and (3)
14 the Electric Vehicle Education and Outreach Program (“Outreach Program”). Under the
15 Transit Charging Program, PECO proposes to offer significant incentives to offset public
16 transit charging station development costs. Through the L2 Program, PECO seeks to
17 provide incentives to commercial and industrial (“C&I”) customers to host charging
18 stations. The purpose of PECO’s proposed Outreach Program is to raise awareness
19 among customers about its EV offerings. The projected costs of the EV Charging Pilot
20 are \$1,625,000. (PECO Statement No. 9 at 5-11).

21 In addition, PECO proposes to expand the availability of the existing EV-FC Pilot
22 Rider to include public transit. Under the EV-FC Pilot Rider, PECO applies a demand
23 credit to a Direct Current Fast Charger’s (“DCFC’s”) nameplate capacity rate for
24 customers installing a qualifying public DCFC served under Rate GS, PD or HT. As

1 proposed in this proceeding, the demand credit would also be made available to public
2 transit. (PECO Statement No. 8 at 13-14).

3 **Q. WHAT ARE RESA’S AND NRG’S POSITIONS ON THESE PROPOSALS?**

4 A. RESA and NRG are opposed to these proposals advanced by PECO. As a fundamental
5 matter, we do not believe that any of its proposals is warranted given the existing private
6 market that is building out EV infrastructure. Simply, there is no need to use ratepayer
7 funds to invest in EV infrastructure, which competitive entities are already deploying at a
8 level that far exceeds the EV adoption rate.

9 **Q. HAS YOUR REVIEW OF PECO’S REBUTTAL TESTIMONY CHANGED YOUR**
10 **ANALYSIS OR RECOMMENDATIONS?**

11 A. No. Most of Ms. Golden’s criticism of my analysis and recommendations points to her
12 perceived shortcomings of the same, but she does not offer evidence to refute my factual
13 assertions or overall observations. In many instances, she does not even disagree with
14 my conclusions but merely points out what I considered or did not consider in reaching
15 them.

16 **Q. WHAT IS YOUR RESPONSE TO MS. GOLDEN’S CRITICISMS?**

17 A. Based on advice of counsel, my understanding is that in a base rate proceeding, the utility
18 bears the burden of proof for its proposals, meaning that in this instance it is incumbent
19 upon PECO to demonstrate that its proposed EV Charging Pilot and expansion of the EV-
20 FC Pilot Rider are just and reasonable and should be implemented. Although RESA and
21 NRG will more fully address the burden of proof in briefing, I note that Ms. Golden’s
22 direct testimony describes the EV Charging Pilot as being designed to incentivize the
23 development of EV charging sites and to gather EV charging data - without establishing
24 the need for either of these outcomes. (PECO Statement No. 9 at 2). The only rationale

1 offered by Ms. Golden is a movement toward transportation electrification (“TE”) in
2 Pennsylvania. (PECO Statement No. 9 at 3-4).

3 While I do not discount Pennsylvania’s movement toward TE, I continue to
4 believe that PECO’s proposed EV Charging Pilot does not reflect the current competitive
5 market, which is attracting private stakeholders that are willing to take on the risk of
6 investment and a wide range of competitive companies innovating to deliver the required
7 EV charging infrastructure ahead of EV adoption. In addition, Ms. Golden fails to
8 address why, in her view, it is appropriate for PECO to rely on ratepayer funds to
9 subsidize EV build out, thereby adversely affecting development of the competitive
10 market. When the private market is already addressing the need for EV charging
11 infrastructure, as my direct testimony shows that it is, the Commission should not allow
12 the monopoly utility to interfere with healthy and robust competition. These private
13 entities, which thrive on innovation to remain competitive, are inherently more flexible
14 and more readily able than utilities to respond to the demands of consumers.

15 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

16 A. My primary recommendation is that the Commission reject PECO’s EV Charging Pilot in
17 its entirety because PECO has failed to offer evidence that any need exists today, by the
18 end of the pilot window in 2024 or even deep into this decade for it to utilize ratepayer
19 funds to incentivize the construction of charging infrastructure for either transit charging
20 or C&I customer host sites. In stark contrast to PECO’s lack of evidence to support its
21 proposals, RESA and NRG have set forth a solid factual basis for rejection of the EV
22 Charging Pilot based on a lack of need. Since PECO has not provided any justification
23 for incentivizing the build out of charging infrastructure, I further recommend that the

1 Commission reject PECO’s proposal to expand its EV-FC Pilot Rider to include public
2 transit. (RESA Statement No. 1-Revised at 5-16).

3 In the event that the Commission permits PECO to implement the EV Charging
4 Pilot, despite the lack of evidence showing a need for it and our strong opposition, as well
5 as that of the Office of Small Business Advocate (“OSBA”) (OSBA Statement No. 1 at
6 14-18), it should direct a number of necessary modifications to each program, as follows:

- 7 • *Transit Charging Program.* The Commission should require PECO to reduce
8 the minimum capacity requirement for each participating DCFC from 250 kW
9 to 50 kW. (RESA/NRG Statement No. 1-Revised at 19-20; RESA/NRG
10 Statement No. 1-R at 7-8). In addition, the Commission should direct PECO
11 to establish an incentive upper limit of 33% of total costs for equipment,
12 installation and make-ready for all sites. (RESA/NRG Statement No. 1-R at
13 9).
- 14 • *L2 Program.* The Commission should require PECO to offer consistent
15 incentives, regardless of the charging station site. (RESA/NRG Statement No.
16 1-Revised at 24). Further, the Commission should make clear that site hosts
17 will have the ability to establish the prices and pricing policies for EV
18 charging services and that program participants may procure electricity supply
19 from an electric generation supplier for any EV charging stations deployed on
20 their property. (RESA/NRG Statement No. 1-R at 11).
- 21 • *Outreach Program.* The Commission should require education and outreach
22 materials to be developed in consultation with stakeholders, be fact based, and
23 be competitively neutral and vendor neutral. (RESA/NRG Statement No. 1-R

1 at 14). As a way of ensuring this outcome, the proposed customer education
2 plan and all outreach materials be should be submitted to the Commission as
3 part of a compliance plan filed in this proceeding.

4 In addition to the above-referenced specific modifications to the three components
5 of PECO's proposed EV Charging Pilot, if the Commission allows it to be implemented,
6 despite our compelling evidence showing that it is unnecessary at this time or in the
7 foreseeable future, I further recommend the following measures:

- 8 • *Gap Analysis.* As a condition of the approval of any aspect of the proposed
9 EV Charging Pilot, the Commission should direct PECO to perform a gap
10 analysis that is currently lacking to establish a need for these ratepayer-funded
11 proposals. PECO should be required to submit the analysis with its
12 compliance plan, subject to comments filed by the parties, for review and
13 approval by the Commission. (RESA/NRG Statement No. 1-SR at 10-11).
- 14 • *Data Access Plan.* The Commission should require PECO to develop a Data
15 Access Plan to provide access to the EV charging data to the stakeholders
16 operating the competitive market for EV products and installations.
17 Specifically, PECO should be required to make publicly available the EV
18 charging station utilization, charging station metrics and analytic data in an
19 anonymized fashion and at the same level of granularity provided to it by the
20 network provider(s). In addition, the Commission should limit PECO's use of
21 customer-owned data to fulfilling its core functions as a regulated utility.
22 (RESA/NRG Statement No. 1-Revised at 26-28; RESA/NRG Statement No.
23 1-R at 19-20).

- 1 • *Annual Report.* The Commission should require PECO to file an Annual
2 Report with the Commission that details the requests received for
3 participation, the number of projects funded, the number of projects not
4 funded, the reason why the projects were not funded, and the costs incurred by
5 PECO for each projected funded. (RESA/NRG Statement No. 1-Revised at
6 29; RESA/NRG Statement No. 1-R at 19-20).

7 **III. PECO'S EV CHARGING PILOT**

8 **Q. PLEASE DESCRIBE MS. GOLDEN'S REBUTTAL TESTIMONY**
9 **CONCERNING PECO'S EV CHARGING PILOT IN GENERAL.**

10 A. Ms. Golden attempts to discredit my conclusion that the charging infrastructure is
11 overbuilt. She suggests that my testimony concerning the lack of need for a statewide
12 charging infrastructure is inaccurate because I do not account for the forecasted growth in
13 EV adoption, address workplace L2 charging or acknowledge the role of utility
14 incentives in encouraging infrastructure build out. (PECO Statement No. 9-R at 2-4).

15 **Q. HOW DO YOU RESPOND?**

16 A. At the outset, despite her efforts to discredit my testimony, I note that Ms. Golden does
17 not dispute, and indeed cannot refute, the fact that the charging infrastructure is overbuilt
18 today. In my direct testimony, I offer numerous data points to demonstrate this
19 overbuild. Citing calculations made by the National Renewable Energy Laboratory
20 ("NREL") regarding the number of DC electric vehicle ports and Level 2 ports that are
21 needed per EVs on the roads, I note that 1.8 DC fast charging ports and 40.1 Level 2
22 ports per 1,000 vehicles are required to support EV adoption. I further point to data
23 compiled by the Alternative Fuels Data Center, which shows that Pennsylvania currently
24 has enough DC fast chargers to support 230,555 vehicles and enough Level 2 chargers to

1 support 46,608 vehicles. This compares to 33,255 EVs that have been sold in
2 Pennsylvania since 2010. (RESA/NRG Statement No. 1-Revised at 10). This means that
3 Level 2 charging is 40% overbuilt and DC fast charging is nearly 600% overbuilt in
4 Pennsylvania. Further, this overbuild rate is consistent with other studies conducted by
5 NREL throughout the country. (RESA/NRG Statement No. 1-Revised at 11). Even if
6 growth forecasts for EV adoption and workplace charging would be factored in, PECO
7 has not presented any evidence to show that this overbuild will end by 2024 or even at
8 any foreseeable time in the future.

9 **Q. DOES MS. GOLDEN REFUTE WHY THE OVERBUILD HAS OCCURRED?**

10 No. In my direct testimony, I explain why this overbuild has occurred, which Ms.
11 Golden does not dispute. It is the result of the competitive market consistently
12 demonstrating the ability to meet customer needs. Automakers are supporting the build
13 out of electric charging infrastructure by building their own private networks and by
14 supporting the build out of existing public networks. My direct testimony offers
15 numerous examples of these automaker initiatives. (RESA/NRG Statement 1-Revised at
16 12-14). I note that Ms. Golden does not take issue or challenge any of these
17 advancements in the private market. Additionally, I explain in my direct testimony that
18 the typical suppliers of fossil fuel are adapting to the anticipated EV charging demand by
19 deploying EV charging infrastructure, as well. Again, I have presented several examples
20 of such efforts (RESA/NRG Statement No. 1-Revised at 14). Ms. Golden has likewise
21 not refuted these extensive strides taken by the private market.

1 **Q. PLEASE COMMENT ON MS. GOLDEN’S REFERENCE TO FORECASTS OF**
2 **THE NUMBER OF EVS THAT WILL BE REGISTERED BY 2030.**

3 Ms. Golden’s reference to forecasts of the EVs that will be registered in Pennsylvania by
4 2030 does not justify the use of ratepayer funds nearly ten years earlier when the private
5 market is fully equipped to handle the anticipated need. (PECO Statement No. 9-R at 3-
6 4). In addition, skewing the prices in the market by introducing ratepayer subsidies is
7 harmful to existing participants that are willing to risk their private funds to provide
8 innovative solutions. I further note that while Ms. Golden criticizes me for not
9 performing an analysis of Pennsylvania’s EV adoption rate, or the adoption rate in
10 PECO’s service territory, she has offered no such data to support PECO’s proposals to
11 offer significant incentives for EV build out now in PECO’s service area. Moreover, it is
12 nonsensical to assume that EV charging infrastructure will, or even should, be aligned
13 with utility service territories. In short, rushing to build technology in a fast-moving
14 industry nearly a decade ahead of time is unjustified and unreasonable.

15 It is noteworthy that Ms. Golden’s direct testimony very generally relies on three
16 factors, including state grants to incentivize TE, a Memorandum of Understanding that
17 Pennsylvania has with 14 other states and the District of Columbia to accelerate the
18 market for electric medium- and heavy-duty vehicles, and a brief discussion in a
19 Commission Secretarial Letter in a proceeding about increased EV deployment. She also
20 makes a passing reference to vehicle manufacturers announcing plans to expand their EV
21 offerings. (PECO Statement No. 9 at 3).

22 None of these factors provides evidentiary support for the introduction by PECO
23 of significant incentives to promote the development of EV infrastructure. Notably, the
24 Commission’s Secretarial Letter she cites closed a “comment-only” proceeding where no

1 hearings were held and no evidence was gathered. The Secretarial Letter merely
2 acknowledged that as “EV usage and distributed energy deployment increase in the
3 coming decades, TOU rates should be considered.”³ In addition, the Commission
4 specifically referred to “the adoption rate of EVs” as “a matter of speculation.”⁴ These
5 factors fail to provide the requisite evidentiary support for PECO’s EV Charging Pilot
6 advanced in this proceeding, and Ms. Golden’s rebuttal testimony adds no further
7 information for the Commission’s consideration.

8 **Q. GIVEN PECO’S CONTINUED FAILURE TO PROVIDE EVIDENCE OF NEED**
9 **FOR THE EV CHARGING PILOT, DO YOU HAVE AN ADDITIONAL**
10 **RECOMMENDATION?**

11 A. Yes. As PECO has continued to refuse to provide evidence in support of the need for the
12 proposed EV Charging Pilot, particularly given the unrefuted current overbuild and
13 extensive efforts of private companies to invest their own dollars to deploy EV
14 infrastructure, any Commission approval of this proposal must be conditioned upon the
15 presentation by PECO of a gap analysis. What I mean by this is that before PECO is
16 permitted to begin collecting ratepayer funds and implementing the EV Charging Pilot, it
17 should be directed to present the requisite analysis that has been lacking in this
18 proceeding. Specifically, the Commission should mandate that PECO identify data
19 sources and evaluation techniques that it has used to determine a need for the proposed
20 EV incentives. This analysis should entail an EV forecast for all customer classes, as
21 well as data showing the public and private charging that is coming online. In addition,
22 the Commission should direct PECO to submit this gap analysis as part of a compliance

³ *Investigation into Default Service and PJM Interconnection, LLC Settlement Reforms*, Docket No. M-2019-3007101 (Secretarial Letter issued January 23, 2020 at 6) (emphasis supplied).

⁴ *Id.*

1 plan, after consultation with stakeholders. Only upon the submission of such analysis by
2 PECO, subject to the filing of comments by the parties, and approval by the Commission
3 should the EV Charging Pilot be implemented. Even then, if the Commission finds a
4 need for the EV Charging Pilot, I reiterate that it should be modified consistent with my
5 other recommendations, as set forth in prior testimony and reiterated above.

6 (RESA/NRG Statement No. 1-SR at 5-7).

7 **Q. PLEASE DESCRIBE MS. GOLDEN'S REBUTTAL TESTIMONY**
8 **CONCERNING EXISTING AND POTENTIAL STATE AND FEDERAL**
9 **INCENTIVES.**

10 A. Ms. Golden testifies that I have not provided any evidence that existing or government
11 incentives will adequately support what she characterizes as "the necessary build out."
12 She further notes that in a discovery response, I indicated that I cannot speak to the
13 factors that may impact private investors to construct EV charging stations. (PECO
14 Statement No. 9-R at 4).

15 **Q. WHAT IS YOUR RESPONSE?**

16 A. Again, it is my understanding that PECO carries the burden of demonstrating the justness
17 and reasonableness of implementing the EV Charging Pilot. Yet, PECO has merely
18 assumed a "necessary build out" without providing evidence to support this assertion.
19 While I cannot speak to all of the factors that may impact private investors to invest in
20 EV infrastructure, the reality is that they are investing, which I have fully addressed.
21 (RESA/NRG Statement No. 1-Revised at 12-14). In my direct testimony, I also point to
22 specific examples of federal and state initiatives that are designed to incentivize the
23 development of EV charging stations. (RESA/NRG Statement No. 1-Revised at 15-16).
24 Ms. Golden, in her rebuttal testimony, does not dispute those measures or my
25 observations concerning the level of those existing and potential funding sources, which

1 are extensive. She also does not address the recent failed investment in SEPTA's electric
2 bus fleet that I explain in my direct testimony, or offer any rationale for why the Transit
3 Charging Program would be any more successful. Given that PECO is seeking to use
4 ratepayer dollars to support EV build out, it is incumbent on PECO to demonstrate the
5 need for its EV Charging Pilot. In our view, it is unnecessary to put this burden on
6 ratepayers since the private competitive market is bearing and will bear the risk of this
7 investment. Notably, competitive companies are better positioned than regulated utilities
8 to quickly and effectively respond to consumer demands and implement needed
9 solutions.

10 **Q. DOES MS. GOLDEN ADDRESS THE ISSUE OF DATA COLLECTION AND**
11 **ACCESS?**

12 A. She does. However, her response is insufficient. She dismisses the claim that it is unfair
13 for PECO to have access to data that companies in the competitive market do not by
14 contending that PECO needs the data to ensure reliable service and promote efficient use
15 of the distribution grid. (PECO Statement No. 9-R at 8). Her assertion ignores the reality
16 that EV build out is completely unrelated to PECO's core function of reliably providing
17 distribution services. Importantly, PECO should not be permitted to play the reliability
18 card to keep EV data to itself. Allowing the monopoly utility to use ratepayers funds to
19 undercut participants in the competitive market is contrary to innovation and the use of
20 technology to deliver products to consumers.

21 **Q. PLEASE DESCRIBE MS. GOLDEN'S TESTIMONY CONCERNING YOUR**
22 **DESCRIPTION OF COMPETITIVE HARM SPECIFIC TO THE TRANSIT**
23 **CHARGING PROGRAM.**

24 A. Ms. Golden testifies that when I was asked in discovery to support my claims of
25 competitive harm specific to the Transit Charging Program, I cited only my knowledge

1 and experience, as well as fundamental economic theories. (PECO Statement No. 9-R at
2 8).

3 **Q. DO YOU HAVE A RESPONSE?**

4 A. Yes. It is basic economic theory that competitive markets work best when monopoly
5 subsidies are not used to skew the pricing of products and services. In my direct
6 testimony, I explain in detail my experience in this industry. (RESA/NRG Statement No.
7 1-Revised at 1-2, 5-16). I further note that while Ms. Golden critiques me for not
8 providing sufficient support for my claims, she in no way refutes the competitive harms
9 that occur when a monopoly subsidizes a product or service that is otherwise available in
10 the private market. Indeed, it would be difficult to surmise how she could dispute the
11 harm caused to a competitive market when a utility is permitted to use its monopoly
12 revenues to subsidize the same products or services that the market is already delivering.

13 **Q. DOES MS. GOLDEN ADDRESS THE RESA/NRG CONTENTION**
14 **CONCERNING THE LACK OF SUPPORT FOR PECO'S PROPOSED**
15 **MINIMUM CAPACITY OF 250 KW FOR TRANSIT CHARGING PORTS?**

16 A. She discusses this issue but continues to not explain the basis for the proposed 250 kW
17 threshold. Ms. Golden merely indicates that PECO chose a threshold of 250 kW to allow
18 for a broader range of high-capacity charging technologies. (PECO Statement No. 9-R at
19 10). However, she does not offer any explanation as to why the minimum capacity
20 should be 250 kW. In my direct testimony, I note that Proterra offers several different
21 charging options starting with 75 kW. (RESA/NRG Statement No. 1-Revised at 20). In
22 addition, Mr. Deal's direct testimony on behalf of ChargePoint recommends the
23 establishment of a 50 kW per DCFC port minimum capacity, explaining that the 250 kW
24 minimum is an unnecessary restriction that could result in needlessly over-sizing EV
25 charging station deployments. (ChargePoint Statement No. 1 at 3, 7). I note support for

1 this proposal in my rebuttal testimony. (RESA/NRG Statement No. 1-R at 7-8). PECO
2 has simply not justified the use of a 250 kW minimum capacity for transit charging ports.

3 **Q. WHAT DOES MS. GOLDEN SAY REGARDING THE RESA/NRG ARGUMENT**
4 **ABOUT THE PERFORMANCE ISSUES OF ELECTRIC BUSES?**

5 A. Ms. Golden suggests that my statements concerning the poor performance issues of
6 electric buses are based on limited information, noting that I identify only two current
7 electric bus deployments in the United States. (PECO Statement No. 9-R at 12).

8 **Q. PLEASE RESPOND.**

9 A. Of note, in her rebuttal testimony, Ms. Golden does not refute my assertions that electric
10 buses are not a good value to transit authorities or that these vehicles are not providing a
11 risk free investment. Rather, she claims – without support – that whether the vehicles are
12 providing a risk free investment is not the “standard” for whether to approve a pilot
13 program. Regardless of the applicable standard to a proposed pilot program, which
14 RESA and NRG will address in briefing, my fundamental point remains the same. It is
15 not a good use of ratepayer funds to invest in electric buses, given the real-world
16 examples of situations in which they have failed to adequately perform. As I have
17 presented specific examples, while highlighting that they do not constitute an exhaustive
18 list, and PECO does not dispute the inadequate performance of electric buses, it continues
19 to be my opinion that the Commission should not approve the Transit Charging Program.

20

1 **IV. PECO'S EV-FC PROPOSAL**

2 **Q. HOW DOES MS. GOLDEN RESPOND IN HER REBUTTAL TESTIMONY TO**
3 **YOUR CONCERNS THAT EXPANDING THE EV-FC PILOT RIDER TO**
4 **INCLUDE PUBLIC TRANSIT IS NOT NECESSARY GIVEN THE LOW**
5 **INTEREST IN THE EXISTING EV-FC PILOT RIDER?**

6 A. In her rebuttal testimony, PECO witness Golden states that “PECO believes that
7 expanding the availability of the EV-FC Rider is complementary to PECO’s proposed
8 Transit Charging Program, will generate valuable data for distribution planning and rate
9 design, and will further support electrification of public transit.” (PECO Statement No.
10 9-R at 17).

11 **Q. DO YOU AGREE WITH MS. GOLDEN’S BELIEF THAT EXPANDING THE EV-**
12 **FC RIDER COMPLEMENTS THE PROPOSED TRANSIT CHARGING**
13 **PROGRAM?**

14 A. No. As I explained above, as well as in my direct and rebuttal testimonies, the need for
15 charging infrastructure is overstated. Therefore, a “complementary” expansion of the EV-
16 FC rider to public transit is similarly not needed at this time.

17 **Q. HOW DOES PECO RESPOND TO YOUR ARGUMENT THAT PECO HAS NOT**
18 **DEMONSTRATED A SUBSTANTIAL NEED FOR EXPANDING THE EV-FC**
19 **PILOT RIDER TO PUBLIC TRANSIT?**

20 A. PECO witness Schlesinger notes that while only two sites were served by the EV-FC
21 Pilot Rider as of January 1, 2021, “13 sites – comprising 70 public EV charging stations –
22 are taking advantage of the Rider as of July 1, 2021.” (PECO Statement No. 8-R at 8).
23 Additionally, Mr. Schlesinger states that “there are 21 sites that have applied for service,
24 but have not yet been energized, and are expected to be billed under the EV-FC Pilot
25 Rider.” (PECO Statement No. 8-R at 8).

1 **Q. DOES MR. SCHLESINGER’S STATEMENT DEMONSTRATE A NEED FOR**
2 **EXPANDING THE EV-FC PILOT RIDER TO PUBLIC TRANSIT?**

3 A. No, for the following reasons. First, the EV-FC Pilot Rider went into effect July 1, 2019.
4 Therefore, two years have elapsed wherein only two sites received service under the EV-
5 FC Pilot Rider. This demonstrates the slow EV adoption rate in PECO’s service territory
6 to which I have previously testified and lack of substantial interest in the EV-FC Pilot
7 Rider. (RESA/NRG Statement No. 1-Revised at 12; RESA/NRG Statement No. 1-R at
8 16–17) Second, PECO merely *expects* the 21 sites that have applied for service, but have
9 not yet been energized, to receive service under the EV-FC Pilot Rider. PECO fails to
10 provide any evidence that supports this conclusion.

11 **V. CONCLUSION**

12 **Q. DOES THAT COMPLETE YOUR SURREBUTTAL TESTIMONY?**

13 A. Yes.

VERIFICATION

I, Danita Park, hereby state that: (1) I am the Director, Electric Vehicle and Commercial Development for NRG Energy, Inc.; (2) that I am authorized to submit this testimony on behalf of the Retail Energy Supply Association and NRG Energy, Inc.; (3) the facts set forth in this testimony are true and correct (or are true and correct to the best of my knowledge, information and belief); and (4) that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: August 5, 2021

Danita Park

Danita Park
Director, Electric Vehicle and
Commercial Development
NRG Energy, Inc.