

May 6 2024

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA

Re: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division,
Docket Nos. R-2024-3046931, *et al.*; **EVgo Services LLC’ Prehearing Memorandum**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is EVgo Services LLC’s Prehearing Memorandum.

Please contact me if you have any questions concerning today’s filing.

Very truly yours,



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Counsel to EVgo Services LLC

Attachments

cc: Administrative Law Judge Marta Guhl, mguhl@pa.gov
Administrative Law Judge Darlene Heep, dheep@pa.gov
Service List

proposed a schedule and December 5, 2024 public meeting date for resolution of the matter (§§ 3, 4); directed the parties to submit a prehearing memorandum by 11:00 A.M. on May 6, 2024 providing the information required in their Order and required by 52 Pa. Code § 5.222(d)(1) (§ 5); and delineated additional procedural matters.

II. ANTICIPATED ISSUES AND SUB-ISSUES

In its initial review of the Company's filing, EVgo has identified the following list of issues and sub-issues it may address in this proceeding, and provides a statement of its preliminary position on each, as follows:

- A. EVgo may address PECO's proposal to replace the fixed demand credit of 50% of nameplate capacity presently available in PECO's existing Rider EV-FC, with a variable demand credit to equal 20% of the measured demand. EVgo generally supports demand charge alternative rates and through this proceeding will evaluate whether the proposed revisions to Rider EV-FC are adequate to address the barrier of high demand charges borne by DCFC owner-operators in PECO's service territory.
- B. EVgo may address PECO's proposal to extend the duration of its existing Electric Vehicle DCFC Pilot Rider (EV-FC) for five years. EVgo expects to support an extension of a DCFC rider, which can provide longer-term rate certainty that enables EV charging operators to plan for the future and make informed investment decisions. Through this proceeding EVgo will evaluate whether the proposed duration of the extension is adequate to provide this certainty.

EVgo reserves the right to raise and address other issues of concern upon further examination of the Company's filing and to respond to issues raised by other parties during the course of this proceeding, and to offer positions at variance and/or in addition to those stated herein.

III. PROPOSED WITNESSES

If EVgo files testimony in this proceeding regarding the aforementioned issues, and proffering the aforementioned positions, such testimony will be sponsored by the following witness:

- Lindsey R. Stegall, 11835 W. Olympic Blvd, #900E, Los Angeles, CA 90064

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

EVgo has no objection to the schedules proposed by the Parties to date, and is willing to work with them and Judges Guhl and Heep on developing a mutually agreeable schedule.

- A. EVgo takes no position on the Complaints or Petitions to Intervene identified in ¶2(b) – (h), or filed on or after the date of the Prehearing Conference Order;
- B. EVgo’s proposed plan (¶ 2.(i)) regarding discovery is to focus on propounding one or more sets of interrogatories and reviewing responses submitted by PECO to EVgo’s and/or other Parties’ requests. EVgo does not presently anticipate that it will notice depositions of any Company witnesses. EVgo may seek on the record data requests during the hearing;
- C. EVgo will obtain admissions as to, or stipulations of, facts not in dispute or the authenticity of documents which might properly shorten the hearing, as appropriate;
- D. EVgo expects to call no more than one witness;
- E. EVgo expects it will take no more than one hour to conduct cross-examination on the issues identified above.
- F. As no discovery has been propounded upon EVgo, EVgo does presently anticipate the need for a protective order pertaining to its own productions. EVgo is willing to honor the terms of protective orders required to examine Company data relevant to its proposed EV-FC demand charge alternative.

V. POSSIBILITY OF SETTLEMENT

EVgo is willing to participate in discussions with the other Parties to amicably resolve the issues in this proceeding, subject to Commission approval.

Dated: May 6, 2024

Respectfully submitted,

EVgo Services, LLC

A handwritten signature in blue ink, appearing to read "Bernice I. Corman", written over a horizontal line.

By its Attorney:

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Dated this 6th day of May, 2024

/s/ Bernice I. Corman