

**PECO ENERGY COMPANY
STATEMENT NO. 8-SR**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

PECO ENERGY COMPANY

DOCKET NO. R-2018-3000164

SURREBUTTAL TESTIMONY

WITNESS: RICHARD A. SCHLESINGER

SUBJECTS: PILOT ELECTRIC VEHICLE DIRECT
CURRENT FAST CHARGER RIDER
AND ADDITIONAL ELECTRIC VEHICLE
PROCEEDINGS

DATED: AUGUST 8, 2018

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**SURREBUTTAL TESTIMONY
OF
RICHARD A. SCHLESINGER**

4
I. INTRODUCTION AND PURPOSE OF TESTIMONY

5 **1. Q. Please state your name, professional position and business address.**

6 A. My name is Richard A. Schlesinger. I am employed by PECO Energy Company
7 ("PECO" or the "Company") as Manager, Retail Rates. My business address is
8 PECO Energy Company, 2301 Market Street, Philadelphia, Pennsylvania 19103.

9 **2. Q. Have you previously submitted testimony in this proceeding?**

10 A. Yes. I submitted direct testimony that is marked as PECO Statement No. 8,
11 supplemental direct testimony that is marked as PECO Statement No. 8-S, and
12 rebuttal testimony that is marked as PECO Statement No. 8-R.

13 **3. Q. What is the purpose of your surrebuttal testimony?**

14 A. My surrebuttal testimony will address the testimony of Mr. Michael K. Waters on
15 behalf of ChargePoint, Inc. ("ChargePoint") concerning: (1) the Company's
16 proposed Pilot Electric Vehicle Direct Current Fast Charger ("EV-FC") Rider; and
17 (2) ChargePoint's proposal that the Pennsylvania Public Utility Commission (the
18 "Commission") open a statewide proceeding to consider the appropriate role of
19 utilities in EV charging, or, alternatively, the Commission expand the scope of its
20 existing proceeding at Docket No. M-2017-2604382 to consider the issue.

1 **II. ELECTRIC VEHICLE ISSUES**

2 **4. Q. Please describe the recommendation made by Mr. Waters concerning the**
3 **Company’s EV-FC Rider.**

4 A. Mr. Waters is generally supportive of the Company’s Rider, but recommends that the
5 term of the demand credit available to Pilot participants be extended beyond the 30
6 months proposed by the Company.¹ Mr. Waters contends that permitting participants
7 to receive the demand credit for the full five-year Pilot term will provide the
8 Company with additional Pilot data and encourage additional investment in Direct
9 Current Fast Chargers (“DCFCs”).

10 **5. Q. Do you agree that the demand credit term should be extended?**

11 A. No. Through the credit, PECO is effectively proposing to share demand costs with
12 customers for up to 30 months to jump-start DCFC investment. The Company is not
13 seeking to recover any portion of this credit from customers. PECO expects that 30
14 months of cost sharing will be sufficient to incentivize DCFC investment and to
15 collect meaningful data from Pilot participants. The credit is not intended to serve as
16 a continuing incentive, and I note that no other party in this proceeding, including
17 Tesla, Inc. (“Tesla”), has taken issue with the term of the demand credit.

¹ More specifically, the Company proposed that the demand credit be available to Pilot participants for 30 months or until the end of the Pilot, whichever comes first.

1 **6. Q. Mr. Waters separately recommends that the Commission initiate a statewide**
2 **proceeding related to the appropriate role of utilities in EV charging or,**
3 **alternatively, expand the scope of its existing proceeding at Docket No. M-2017-**
4 **2604382 to include this issue. Please respond.**

5 A. First, I note that ChargePoint has repeatedly filed comments at Docket No. M-2017-
6 2604382 requesting that the Commission broaden the scope of that proceeding to
7 include more EV issues, including as recently as July 30, 2018.² These requests
8 relating to additional proceedings have no place in PECO’s base rate proceeding and
9 are unrelated to the Company’s proposed Rider. In fact, Mr. Waters (p. 13) states that
10 his recommendation “should not delay or interfere with timely adjudication” of
11 PECO’s Rider.

12 Second, ChargePoint, Tesla and the Office of Consumer Advocate (“OCA”) have all
13 stated that PECO’s Pilot will generate meaningful data.³ The broader issues raised by
14 ChargePoint, such as the appropriate role of utilities in EV charging, will be better
15 explored and addressed with data from PECO’s Pilot and other utility EV initiatives.⁴

² See Docket No. M-2017-2604382, Comments of ChargePoint dated July 30, 2018, p. 3 (“ChargePoint respectfully reiterates the recommendation provided in our initial comments that the Commission to [sic] examine the full suite of regulatory issues stemming from transportation electrification. The issues in this proceeding, as well as issues related to appropriate roles of regulated utilities in EV charging infrastructure deployment and EV charging rate design, present significant regulatory uncertainty.”); Docket No. M-2017-2604382, Comments of ChargePoint dated August 28, 2017, p. 10 (“ChargePoint respectfully urges the Commission to expand the scope of the Secretarial Letter into a formal rulemaking proceeding to consider the full suite of regulatory options and the role of the regulated utility as it related [sic] to supporting EV charging and infrastructure”).

³ See, e.g., ChargePoint Statement No. 1, pp. 6-7; Tesla Statement No. TESLA-BB-1, p. 11; OCA Statement No. 3, p. 35.

⁴ As Mr. Waters notes, Duquesne Light Company has made EV-related proposals in its pending base rate proceeding at Docket No. R-2018-3000124.

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III. CONCLUSION

2 7. Q. Does that complete your surrebuttal testimony?

3 A. Yes, it does.

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