

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
  
DIRECT TESTIMONY OF

**DANITA PARK**

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

Docket No. R-2021-3023618

UGI Utilities, Inc. – Electric Division  
2021 Base Rate Proceeding

TOPIC:

Electric Vehicle Program

May 3, 2021

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	OVERVIEW AND SCOPE OF TESTIMONY .....	3
III.	ELECTRIC VEHICLE MARKET .....	7
IV.	UGI ELECTRIC’S ELECTRIC VEHICLE PROGRAM PROPOSAL .....	15
A.	Data Access Issues.....	20
B.	Third-Party EV Charging Stations.....	21
C.	Customer Education and Outreach .....	23
V.	CONCLUSION.....	24

## TABLE OF EXHIBITS

Exhibit DP-1	UGI Electric Response to RESA and NRG Set I, No. 17
Exhibit DP-2	UGI Electric Response to OSBA Set I, No. 21
Exhibit DP-3	UGI Electric Response to RESA and NRG Set I, No. 12
Exhibit DP-4	UGI Electric Response to RESA and NRG Set I, No. 9
Exhibit DP-5	UGI Electric Response to RESA and NRG Set I, No. 27

1 **I. INTRODUCTION**

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

3 A. Danita Park.

4 **Q. PLEASE STATE YOUR CURRENT EMPLOYER AND TITLE.**

5 A. I am employed by NRG Energy, Inc. (“NRG”) and serve as Director, Electric Vehicle  
6 and Commercial Development.

7 **Q. WHAT ARE YOUR VARIOUS JOB RESPONSIBILITIES?**

8 A. I create new lines of business to support NRG’s commercial and industrial customers. In  
9 this role, I supported the creation of a business to advise Virtual Power Purchase  
10 Agreements. I also am spearheading an effort to set an Electric Vehicle fleet conversion  
11 target for NRG Energy.

12 **Q. WHAT IS YOUR BUSINESS ADDRESS?**

13 A. 910 Louisiana Street, Houston, TX 77002.

14 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.**

15 I hold a Bachelor of Science in Biochemistry and a Masters in Business Administration,  
16 Finance both from the University of Calgary in Calgary, Alberta, Canada. I began my  
17 career in the energy industry in 1998 as an equity analyst with Arc Financial in Calgary,  
18 Canada. In that role, I analyzed oil and gas service companies (horizontal drilling,  
19 drilling tools, cementing companies, for example) and made recommendations for  
20 investment.

21 I joined Dynegy Inc. in 2000 where I worked on the deployment of a front, mid  
22 and back office natural gas trading systems. I held several roles in the wholesale power  
23 organization including risk management, business management, and asset management,  
24 and led the real-time power trading desk. My key roles involved analyzing portfolio risk,

1 modeling and budgeting the value of power generation assets, modeling and trading  
2 capacity markets, and modeling and trading real time power.

3 I joined Calpine Corporation (“Calpine”) in 2006 where I worked in fundamental  
4 analysis and portfolio analysis with similar responsibilities as at Dynegy. I managed the  
5 due diligence process for Calpine’s acquisition of Conectiv Energy, a \$1.65 billion  
6 acquisition, and led the wholesale asset integration.

7 In 2012, I joined NRG as Director Asset Management, East Region. My primary  
8 responsibility in this role was to manage each power plant as a business. I was  
9 responsible for the overall financial performance of the asset and worked cross  
10 functionally with teams from tax, insurance, trading, plant operations, legal,  
11 environmental, governmental affairs, and regulatory affairs to ensure the full value of  
12 each asset was achieved.

13 In 2018, I joined NRG Business Solutions (now NRG Business) in the role of  
14 Director, Commercial Development. In this role I participated as a panelist at the  
15 Renewable Energy Markets Conference in Houston, Texas and spoke on the topic of  
16 building resilient business operations. In 2019, I was appointed to our electric vehicle  
17 task force. Today my role has been expanded to Director, Electric Vehicle and  
18 Commercial Development.

19 **Q. HAVE YOU EVER PROVIDED TESTIMONY BEFORE THIS COMMISSION?**

20 A. I have not.

21 **Q. HAVE YOU PROVIDED TESTIMONY IN UTILITY PROCEEDINGS IN OTHER**  
22 **STATES?**

23 A. I have not.

1 **II. OVERVIEW AND SCOPE OF TESTIMONY**

2 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

3 A. I am testifying on behalf of the Retail Energy Supply Association (“RESA”) and NRG  
4 Energy, Inc. (“NRG”).

5 **Q. PLEASE DESCRIBE THE RETAIL ENERGY SUPPLY ASSOCIATION.**

6 A. Retail Energy Supply Association (“RESA”) is a trade association of energy companies  
7 including Pennsylvania licensed electric generation suppliers (“EGSs”), many of whom  
8 either offer or have relationships with third party providers that develop and offer electric  
9 storage options and/or electric vehicle charging infrastructure.<sup>1</sup>

10 **Q. PLEASE DESCRIBE NRG ENERGY, INC.**

11 A. NRG is a leading integrated power company built on dynamic retail brands and diverse  
12 generation assets. A Fortune 500 company, NRG brings the power of energy to  
13 consumers by producing, selling and delivering electricity and related products and  
14 services to consumers in competitive markets across the U.S. and Canada, as well as  
15 23,000 MW of electric power generation including nuclear, coal, gas, oil and solar  
16 nationwide. NRG’s retail brands serve more than six million customers across North  
17 America, including a significant share in Pennsylvania – so significant, in fact, that  
18 NRG’s northeast retail business is headquartered in Philadelphia. We have several  
19 licensed retail electricity suppliers that are actively serving residential, commercial,

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<sup>1</sup> 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](http://www.resausa.org).

1 industrial and institutional customers.<sup>2</sup> NRG’s retail companies offer customers a range  
2 of products including demand response and energy efficiency, 100% renewable energy,  
3 energy plans bundled with energy efficiency technology, such as Nest or Hive  
4 thermostats, as well as loyalty rewards and our charitable giving products through our  
5 “Choose to Give” plans.

6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

7 A. The purpose of my testimony is to address UGI Utilities, Inc. – Electric Division’s (“UGI  
8 Electric” or “Company”) proposed Electric Vehicle (“EV”) Program. In addressing the  
9 Company’s proposed EV Program, I will discuss the Direct Testimony of UGI Electric  
10 witnesses Eric W. Sorber and John D. Taylor. In my testimony, I describe the positions  
11 of RESA and NRG with respect to issues raised by UGI Electric’s electric vehicle  
12 proposal.

13 RESA and NRG support the general policy objective of UGI Electric to promote  
14 EV charging infrastructure and customer education in the Company’s service territory.  
15 However, they generally oppose the EV Program through which UGI Electric seeks to  
16 own and operate EV charging stations outside of the competitive market. RESA and  
17 NRG also oppose UGI Electric’s proposal to invest in make-ready infrastructure.  
18 Monopoly utility investment in EV transportation infrastructure should be limited to the  
19 rare circumstance where customer demand is unmet and/or private investment is

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<sup>2</sup> 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 uneconomic. It is premature to determine that either of these situations present today in  
2 UGI Electric's service territory.

3 Beyond the aforementioned policy positions, I will demonstrate that UGI  
4 Electric's proposed EV Program does not reflect the reality of EV consumer behavior, the  
5 current competitive market for charging infrastructure, and the observed and reported  
6 factual need for public charging. I will demonstrate that the forces of the competitive  
7 market are attracting both private stakeholders willing to take on the risk and a wide  
8 range of competitive companies innovating to deliver the required EV charging  
9 infrastructure ahead of EV adoption.

10 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

11 A. Yes. The exhibits enclosed with my testimony are various discovery responses served in  
12 this proceeding.

13 **Q. DO YOU HAVE ANY PERSONAL EXPERIENCE WITH ELECTRIC**  
14 **VEHICLES?**

15 A. Yes. I bought my first electric vehicle in 2016.<sup>3</sup> I have charged my vehicle at work, at  
16 home, at private charging networks, and public charging. I own a Tesla with a maximum  
17 range of 240 miles and an operating range of 210 miles. I currently charge at home, in  
18 my garage using a wall plug (120V) and the charger supplied with my vehicle.

19 **Q. IS THERE ANY JUSTIFICATION FOR UGI ELECTRIC TO OWN OR**  
20 **OPERATE ELECTRIC VEHICLE CHARGING INFRASTRUCTURE?**

21 A. No. As I discuss below, the market forces have clearly demonstrated – across all of the  
22 States, including Pennsylvania – that the competitive companies are anticipating and

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<sup>3</sup> NRG Energy, Inc., Insights - *When the car you want is a rainbow-colored unicorn*, published April 28, 2021 by Danita Park, available at <https://www.nrg.com/insights/energy-education/when-the-car-you-want-is-a-rainbow-colored-unicorn.html?sid=GSM-IG-2021April-DanitaParkEVBlog2Hybrids>

1 responding to Electric Vehicle adoption, and indeed even over-supply DC fast capability  
2 by orders of magnitude over demonstrated need.

3 There is simply no need for Utility intervention in this clearly competitive market.  
4 UGI Electric has failed in all regards to demonstrate any need for electric vehicle  
5 charging. As I discuss below, private entities ranging from electric vehicle charging  
6 companies to auto makers to traditional fossil fuel suppliers are using their own funds to  
7 build the required infrastructure to meet customer demand.

8 **Q. SHOULD UGI ELECTRIC INVEST IN CHARGING INFRASTRUCTURE OR**  
9 **MAKE READY SITES?**

10 A. No. As explained below, the market is already exceeding demand for fast charging. UGI  
11 Electric has failed to demonstrate any true need. UGI Electric has failed to accurately  
12 describe the market forces or consumer behavior in the space. Providing UGI Electric  
13 with ratepayer funds to build out three new DC charging stations will contribute to the  
14 over build of electric vehicle infrastructure, and waste ratepayer dollars. Private entities  
15 are both willing and able to make these investments and should be allowed to do so  
16 unencumbered by utility interference.

17 **Q. WHAT ARE YOUR PRIMARY CONCERNS WITH UGI ELECTRIC'S**  
18 **PROPOSED EV PROGRAM?**

19 A. We have a few of concerns. First, allowing the monopoly utility to interfere in the  
20 competitive market using ratepayer dollars has the potential to disincentivize private  
21 investment in this space. Regulated utilities have the unique advantage of guaranteed  
22 cost recovery that private companies do not enjoy, thus creating an uneven playing field  
23 when regulated entities are permitted to participate in the competitive market. Second,  
24 allowing UGI Electric to invest in EV infrastructure puts investment risk on ratepayers,  
25 rather than where it rightly belongs – with the shareholders of private companies.



1                   Importantly, there is simply no need for utility-owned and operated investment.  
2                   UGI Electric’s proposal is built on misconceptions about EV charging needs and  
3                   represents a 20<sup>th</sup> century solution to a 21<sup>st</sup> century problem.

4   **Q.   DO YOU HAVE RECOMMENDATIONS FOR THE COMMISSION TO**  
5   **CONSIDER?**

6   A.   Yes. I recommend that the Commission reject UGI Electric’s request to construct and  
7           own three DC fast charging stations and invest in make-ready infrastructure. I also  
8           recommend that UGI Electric’s EV Program focus on customer education aimed at  
9           correcting the consumer misconceptions that serve as a barrier to EV adoption.

10 **III.   ELECTRIC VEHICLE MARKET**

11 **Q.   DO YOU BASE YOUR POLICY RECOMMENDATIONS ON UGI ELECTRIC’S**  
12 **EV CHARGING PROPOSALS ON REAL WORLD EXPERIENCE AND**  
13 **KNOWLEDGE ABOUT WHAT IS OCCURRING IN THE EV CHARGING**  
14 **MARKET TODAY?**

15 A.   Yes, and in the remainder of my testimony, I will elaborate on that experience and  
16           knowledge. I will highlight common misconceptions, actual consumer driving behavior,  
17           driving distances, and charging needs. I also will call attention to the dynamic and  
18           rapidly growing market that is attracting investment from energy, technology and  
19           automotive players all willing to risk their own capital to meet the anticipated EV  
20           adoption growth.

21 **Q.   HOW MANY ELECTRIC VEHICLES HAVE BEEN SOLD IN THE UNITED**  
22 **STATES SINCE 2010?**

23 A.   Between January 1, 2010 and March 31, 2021, the number of plug-in electric and all-  
24           electric battery powered vehicles sold in the United States is 1,818,473.<sup>4</sup>

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<sup>4</sup> Argonne National Laboratory, *Light Duty Electric Drive Vehicles Monthly Sales Updates*, see <https://www.anl.gov/es/light-duty-electric-drive-vehicles-monthly-sales-updates>

1 **Q. WHAT PERCENTAGE OF ELECTRIC VEHICLE OWNERS CHARGE AT**  
2 **HOME?**

3 A. More than 80% of charging occurs at home.<sup>5</sup>

4 **Q. WHAT IS THE TYPICAL DRIVING EXPERIENCE FOR AMERICANS?**

5 A. The average American drives 31.5 miles each day and spends 51 minutes driving while  
6 taking an average of 2.2 trips per day.<sup>6</sup>

7 **Q. WHAT ARE THE THREE MOST COMMON MISCONCEPTIONS REGARDING**  
8 **ELECTRIC VEHICLES IN YOUR EXPERIENCE?**

9 A. There are at least three misconceptions that serve as key barriers to EV adoption and,  
10 arguably, are holding back potential EV owners from making their next vehicle an  
11 electric one. The fact that less than 2% of residents in the Commonwealth have moved to  
12 EV ownership is evidence of the strength of these misconceptions and the need for better  
13 and more consumer education.

14 The first misconception involves consumer perceptions of EV charging needs. It  
15 is quite common (and wrong) to assume that EV owners will charge their electric vehicle  
16 in the same way they fuel a fossil fuel vehicle – i.e., at a third-party gas station. The only  
17 frame of reference consumers have about EV fueling needs is their experience with  
18 fueling their gas or diesel vehicles. Homeownership in Pennsylvania is nearly 70%;<sup>7</sup> the  
19 first choice for any new electric vehicle owner to charge their vehicle will be at home.  
20 Customer education is key to informing consumers about how EV fueling is quite  
21 different than fossil fuel vehicle needs.

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<sup>5</sup> U.S. DOE Office of Energy Efficiency & Renewable Energy, Electric Vehicles, see <https://www.energy.gov/eere/electricvehicles/charging-home>

<sup>6</sup> AAA Foundation for Traffic Safety, *American Driving Survey, 2014 – 2017*, see [http://aaafoundation.org/wp-content/uploads/2019/02/18-0783\\_AAAFTS-ADS-Brief\\_r8.pdf](http://aaafoundation.org/wp-content/uploads/2019/02/18-0783_AAAFTS-ADS-Brief_r8.pdf)

<sup>7</sup> United States Census Bureau, QuickFacts Pennsylvania, see <https://www.census.gov/quickfacts/fact/table/PA/BZA010219>

1           The second misconception involves perceptions about EV battery range – often  
2 referred to as range anxiety. This perception is unfounded. Auto manufacturers are  
3 delivering more models with vehicle battery range exceeding 200 miles. As noted  
4 previously, in the United States, the average daily trip is 31 miles, nearly a week’s worth  
5 of driving can occur on a single charge with a vehicle that has 200 miles of range. This  
6 misconception presents another opportunity for customer education.

7           The third most common misconception is about the amount of infrastructure  
8 required to support EV adoption. With an average daily driving range of 31 miles, the  
9 amount of charging required to meet the typical customer’s mileage needs can be met  
10 with overnight recharging (i.e., 6-8 hours) using a 120V plug or using a level 2 charger in  
11 about 1.5 hours. Both charging methods are commonly deployed at home and work. Few  
12 consumers realize that they do not need DC fast charging, save for a few limited times  
13 over the course of 15,000 miles of driving.

14 **Q. ARE THERE ANY REPORTS AVAILABLE THAT DESCRIBE CONSUMER**  
15 **CHARGING BEHAVIOR AND RELIANCE ON FAST CHARGING?**

16 A. Yes. Consumer Reports, a trusted source of information for millions of consumers across  
17 the country, published a report in October 2020 on EV ownership which debunks these  
18 and other common consumer misconceptions.<sup>8</sup>

19 **Q. WHAT IS THE ESTIMATED NUMBER OF CHARGING PORTS PER 1,000**  
20 **ELECTRIC VEHICLES?**

21 A. The National Renewable Energy Laboratory (“NREL”) has estimated a need for 27,500  
22 DC electric vehicle ports and 601,000 level 2 ports, based on a scenario where there are

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<sup>8</sup> *Electric Vehicle Ownership Costs: Today’s Electric Vehicles Offer Big Savings for Consumers*, Harto, Chris, October 2020, <https://advocacy.consumerreports.org/wp-content/uploads/2020/10/EV-Ownership-Cost-Final-Report-1.pdf>.

1 15 million light duty plug in vehicles on the roads.<sup>9</sup> The implied rate of charging required  
2 to support EV adoption is 1.8 DC fast charging ports per 1000 vehicles and 40.1 level 2  
3 ports per 1,000 vehicles.

4 **Q. HOW MANY ELECTRIC VEHICLES DOES THE EXISTING PENNSYLVANIA**  
5 **ELECTRIC VEHICLE CHARGING INFRASTRUCTURE SUPPORT?**

6 A. According to the refreshed Pennsylvania Road Map for Electric Charging there are 324  
7 DC Fast Chargers, enough to support 180,000 vehicles; and 1,596 Level 2 chargers –  
8 enough to support 39,800 vehicles.<sup>10</sup>

9 **Q. BASED ON THE ACTUAL NUMBER OF REGISTERED VEHICLES IN**  
10 **PENNSYLVANIA (32,019) HOW MANY DC FAST CHARGERS AND LEVEL 2**  
11 **CHARGERS ARE REQUIRED?**<sup>11</sup>

12 A. Based on the guidance provided by NREL (noted above), Pennsylvania’s statewide  
13 estimated DC fast charging need is 57 units, while its estimated Level 2 charging need is  
14 1,283 units.

15 **Q. BASED ON THE NREL ESTIMATE OF CHARGING NEED AND THE ACTUAL**  
16 **REPORTED NUMBER OF CHARGING PORTS DISCLOSED IN THE**  
17 **UPDATED ROADMAP, IS THERE AN OVERBUILD OF CHARGING**  
18 **CAPACITY IN PENNSYLVANIA?**

19 A. Yes. There are 267 more DC fast ports and 313 Level 2 charging ports than are necessary  
20 to support the electric vehicles in Pennsylvania.

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<sup>9</sup> *National Plug-In Electric Vehicle Infrastructure Analysis*, U.S. DOE, Office of Energy Efficiency & Renewable Energy, September 2017, see <https://www.nrel.gov/docs/fy17osti/69031.pdf>

<sup>10</sup> Pennsylvania Electric Vehicle Roadmap: 2021 Update, Pennsylvania Department of Environmental Protection, see <https://files.dep.state.pa.us/Energy/OfficeofPollutionPrevention/StateEnergyProgram/PAElectricVehRoadmapBookletDEP5334.pdf>

<sup>11</sup> Alliance for Automotive Innovation, as of 4/25/2021; filtered for PA; see <https://www.autosinnovate.org/resources/electric-vehicle-sales-dashboard>.

1 **Q. IS THE OVER BUILD OF CHARGING INFRASTRUCTURE IN**  
2 **PENNSYLVANIA CONSISTENT WITH OTHER STUDIES?**

3 A. Yes. In the second quarter of 2020, NREL estimates that in the United States there are  
4 more charging ports than required for the number of registered electric vehicles: 14,551  
5 DC fast charge ports – enough to serve 8.1 million electric vehicles, and 74,238 Level 2  
6 charge ports – enough to serve 1.8 million electric vehicles.

7 **Q. IS UGI ELECTRIC’S CLAIM THAT THERE ARE NO CHARGING PORTS IN**  
8 **THEIR SERVICE TERRITORY REASON ENOUGH TO JUSTIFY**  
9 **OVERBUILDING FAST CHARGING IN THEIR SERVICE TERRITORY?**

10 A. No. UGI Electric’s claim that there is no charging infrastructure alone is an insufficient  
11 demonstration of need. Nor has UGI Electric demonstrated that any investment will be  
12 utilized sufficiently to warrant investment. As a practical matter, it is important to  
13 understand that utility service territories have no relationship to transportation needs,  
14 highways or the ideal locations for DC fast charging. UGI Electric is solely focused on  
15 investments they can make in their footprint. The transportation needs inside a single  
16 utility service territory is an inherently poor criteria for determining the location for any  
17 vehicle charging infrastructure and wholly insufficient to justify ratepayer investment.

18 **Q. CAN YOU PROVIDE ANY EXAMPLES OF COMPETITIVE BUSINESSES**  
19 **THAT BUILD, OWN, AND/OR OPERATE ELECTRIC VEHICLE CHARGING**  
20 **INFRASTRUCTURE?**

21 A. Yes, there are many well-established, well-capitalized businesses in this space including:  
22 Blink,<sup>12</sup> Volta,<sup>13</sup> EVgo,<sup>14</sup> and Electrify America.<sup>15</sup> These companies are deploying their

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<sup>12</sup> *Electric Vehicle Charging Stations, Blink Charging Solutions*, see [https://blinkcharging-dev.azurewebsites.net/wp-content/uploads/2020/04/1.3\\_BlinkOverview.pdf](https://blinkcharging-dev.azurewebsites.net/wp-content/uploads/2020/04/1.3_BlinkOverview.pdf)

<sup>13</sup> *Volta Investor Relations*, see <https://voltacharging.com/investor-relations/>

<sup>14</sup> *EVgo Fast Charging, EVgo Investor Relations*, see <https://www.evgo.com/investors/>

<sup>15</sup> *Electrify America, Our Investment Plan*, see <https://www.electrifyamerica.com/our-plan/>

1 own capital to build and often own electric charging infrastructure in the United States.  
2 Electrify America, alone, has a commitment to spend \$1.2 Billion dollars in States other  
3 than California to build charging infrastructure, as part of the Volkswagen diesel  
4 emissions settlement.

5 **Q. ARE AUTOMAKERS SUPPORTING THE BUILD OUT OF ELECTRIC**  
6 **CHARGING INFRASTRUCTURE?**

7 A. Yes. Automakers are directly supporting the build out of electric charging infrastructure.  
8 They are doing this by building their own private networks and by supporting the build  
9 out of existing public networks. The following are just a few examples of a subset of  
10 automakers and their current and announced networks of electric charging infrastructure.

- 11 • Tesla, with 79% market share of the electric vehicle market has built an extensive  
12 private network to support their consumers and currently provides nearly 60% of  
13 all DC fast charging ports in the country.<sup>16</sup>
- 14 • Rivian is a new auto maker producing the R1T, R1S and supplying Amazon with  
15 100,000 commercial vans. They have announced plans to build a network of  
16 3,500 DC fast chargers at over 600 sites by 2023 including many sites in  
17 Pennsylvania.<sup>17</sup>
- 18 • Ford announced a network of 12,000 charging stations to support their growing  
19 electric vehicle line up.<sup>18</sup>

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<sup>16</sup> Electrek, *Tesla owns 79% of the electric car market in the US, and that needs to change*, dated February 16, 2021 see <https://electrek.co/2021/02/16/tesla-owns-electric-car-market-us/#:~:text=Tesla%20owns%20almost%2079%25%20of,the%20US%20electric%20car%20market>, and NREL, *Electric Vehicle Charging Infrastructure Trends from the Alternative Fueling Station Locator: Second Quarter 2020*, dated January 2021, see <https://www.nrel.gov/docs/fy21osti/78486.pdf>

<sup>17</sup> Rivian – Charging Your Rivian, see <https://stories.rivian.com/charging-your-rivian>

<sup>18</sup> Electrek – *Ford announces plans for EV charging, partners with Amazon and Greenlots*, dated October 17, 2019, see <https://electrek.co/2019/10/17/ford-charging-electric-cars-partners-amazon-greenlots/>

- 1 • General Motors (GM) is investing in 2,700 new DC Fast Chargers on EVgo’s  
2 network. EVgo’s network is currently over 800 Fast Chargers.<sup>19</sup>
- 3 • Jeep is partnering with Electrify America to put chargers at trail heads.<sup>20</sup>
- 4 • Volkswagen in 2016 created Electrify America as part of the Volkswagen diesel  
5 settlement with a commitment to invest \$2 billion in electric vehicle  
6 infrastructure, including \$1.2 billion outside of California. Cycle 2 investment is  
7 currently underway. Cycle 3 is in the planning phase. Public comment and  
8 requests for siting is allowed and the most recent planning Cycle 3 accepted  
9 comments through August 14, 2020.

10 **Q. HOW ARE THE TYPICAL SUPPLIERS OF FOSSIL FUEL RESPONDING TO**  
11 **THE NASCENT ADOPTION OF ELECTRIC VEHICLES?**

12 A. Typical suppliers of gasoline and diesel are adapting to the anticipated EV charging  
13 demand by deploying electric vehicle charging infrastructure, as well. Recent examples  
14 include: Wawa, which hosts 35 Electric Charging stations to date and opened its first EV  
15 only charging station in Virginia; Royal Dutch Shell, which has announced plans to  
16 deploy 500,000 charging points globally by 2025; Chevron, which announced investment  
17 in a handful of retail charging sites and also holds investments in electric charging such  
18 as the one in ChargePoint through its new venture technology fund; and BP, which

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<sup>19</sup> *GM will help EVgo triple its fast charger network in the US* - The Verge, dated July 31, 2020, see <https://www.theverge.com/2020/7/31/21349614/general-motors-evgo-fast-charging-network-investment>

<sup>20</sup> *Jeep and Electrify America to put EV chargers at 4WD trailheads*, Joe Lorio, dated March 26, 2021, see [https://autos.yahoo.com/jeep-electrify-america-put-ev-185800511.html?guccounter=1&guce\\_referrer=aHR0cHM6Ly93d3cuZ29vZ2xILmNvbS8&guce\\_referrer\\_sig=AQAAAGb7j12f6sKS\\_Z9K0Bt5ARlnrLkT6PpmKLCIGaeNMjt46BV8kc7PE5LVsUMeHtgLkP5PitwRvWTSudRJCoiDsCPJLn1IerRzQP61GE73qki02owcMkMOigWUaTZdEEDtagiyZtWukLEz\\_DUF2uZpEDbkVRfVT2A7zP67FkEYfONG](https://autos.yahoo.com/jeep-electrify-america-put-ev-185800511.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xILmNvbS8&guce_referrer_sig=AQAAAGb7j12f6sKS_Z9K0Bt5ARlnrLkT6PpmKLCIGaeNMjt46BV8kc7PE5LVsUMeHtgLkP5PitwRvWTSudRJCoiDsCPJLn1IerRzQP61GE73qki02owcMkMOigWUaTZdEEDtagiyZtWukLEz_DUF2uZpEDbkVRfVT2A7zP67FkEYfONG)

1 purchased an electric vehicle charging station in the UK, and in the US has backed start  
2 up FreeWire.

3 **Q. WHAT IS THE CURRENT MARKET SHARE OF ELECTRIC VEHICLES IN**  
4 **PENNSYLVANIA?**

5 A. According to The Alliance for Automotive Innovation, 32,019 electric vehicles have been  
6 sold in Pennsylvania since 2010, out of approximately 1,818,473 sold in the entire US  
7 over approximately the same time frame (or ~ 1.76%).

8 **Q. HOW DOES EV ADOPTION IN UGI ELECTRIC'S SERVICE TERRITORY**  
9 **COMPARE TO EV ADOPTION IN THE REST OF THE COMMONWEALTH?**

10 A. According to UGI, UGI Electric's service territory has seen much lower adoption of EVs  
11 than the rest of the Commonwealth. (UGI Electric Statement No. 6 at 34).

12 **Q. IS IT REASONABLE FOR RATEPAYERS (IN A SMALL SERVICE**  
13 **TERRITORY) TO FUND THE DEPLOYMENT OF EV INFRASTRUCTURE?**

14 A. No. UGI Electric's captive ratepayers should not bear the risk of utility investment in a  
15 market that is clearly competitive and benefiting from investment by numerous  
16 competitive companies, as noted above. The competitive market, and most importantly  
17 private shareholders, should take on the burden and risk of funding research and  
18 development of innovative products and services in this burgeoning market.

19 **Q. DOES THE LOW EV ADOPTION RATE IN UGI ELECTRIC'S SERVICE**  
20 **TERRITORY SUGGEST THAT INVESTMENT IS NEEDED BY UGI**  
21 **ELECTRIC?**

22 A. It does not. As I explained above, consumer driving behavior, actual EV charging needs,  
23 and the overall transportation infrastructure needs cannot be viewed through the telescope  
24 of a single electric utility service territory.



1 **IV. UGI ELECTRIC’S ELECTRIC VEHICLE PROGRAM PROPOSAL**

2 **Q. PLEASE EXPLAIN UGI ELECTRIC’S PROPOSED ELECTRIC VEHICLE**  
3 **PROGRAM.**

4 A. UGI Electric’s proposed EV Program has three components. First, UGI Electric plans to  
5 install and own three EV charging stations. (UGI Electric Statement No. 3 at 29).  
6 Second, UGI Electric proposes to develop make-ready infrastructure to be used by third-  
7 party EV charging station operators. Third, UGI Electric proposes customer education  
8 and outreach on EVs. (UGI Electric Statement No. 6 at 36).

9 **Q. DO YOU HAVE ANY CONCERNS WITH THE DESIGN OF UGI ELECTRIC’S**  
10 **PROPOSED EV PROGRAM?**

11 A. Yes. UGI Electric has failed to demonstrate that there is any need for Utility investment,  
12 that there is any need for electric vehicle charging, and that there is any need for either  
13 DC Fast charging or Level 2 charging that the competitive market will not provide. UGI  
14 Electric has failed to acknowledge that 80% of charging occurs at home or at work,  
15 providing at best misleading testimony of need. In short, there is no need for the program  
16 aside from providing education that is coordinated with the PUC, UGI and interested  
17 third-party stakeholders.

18 **Q. PLEASE DESCRIBE UGI ELECTRIC’S PROPOSAL TO INSTALL AND OWN**  
19 **THREE EV CHARGING STATIONS IN MORE DETAIL.**

20 A. UGI Electric proposes to install and own three EV charging stations. UGI Electric  
21 proposes that each of the charging stations consist of one DC Fast Charge (“DCFC”)  
22 charging station capable of charging a vehicle to approximately 80% of full charge within  
23 30 minutes. Locations will also be evaluated for additional Level 2 charger installations  
24 capable of providing 20 miles of range per hour of charging time. (UGI Electric  
25 Statement No. 3 at 29). UGI Electric anticipates that each location will include two

1 Level 2 chargers. (see attached RESA/NRG Exhibit DP-1, UGI Electric Response to  
2 RESA and NRG Set I, No. 17). UGI Electric has identified three general locations along  
3 primary transportation corridors for the EV charging stations. (UGI Electric Statement  
4 No. 3 at 30).

5 **Q. DOES UGI ELECTRIC INTEND TO PARTNER WITH A NETWORK**  
6 **PROVIDER?**

7 A. Yes. The Company intends to install ChargePoint equipment and utilize its network  
8 services. Network services will be covered under an annual fee and will include the real-  
9 time monitoring and administration of the charging units including scheduled charging,  
10 analytics and reporting, pricing and automatic funds collection, energy management,  
11 driver support, and predictive maintenance and diagnosis. (see attached RESA/NRG  
12 Exhibit DP-2, UGI Electric Response to OSBA Set I, No. 21).

13 **Q. IS UGI ELECTRIC PROPOSING ANY CHANGES TO ITS TARIFF?**

14 A. Yes. The Company proposes a new Rate EV-C (“Electric Vehicle Company Owned  
15 Charging”) to address Company-owned EV charging stations. The new Rate Schedule  
16 EV-C would set the maximum rate per kWh charged to EV operators at UGI-owned  
17 public EV charging stations at \$0.50/kWh. (UGI Electric Statement No. 6 at 44).

18 **Q. WILL UGI ELECTRIC OFFER TIME-OF-USE RATES?**

19 A. UGI Electric anticipates that EV charging station pricing will be established based on  
20 prevailing market or standard pricing criteria. UGI Electric is working with ChargePoint  
21 to evaluate related pricing criteria and factors that may vary with time of use. (see  
22 attached RESA/NRG Exhibit DP-3, UGI Electric Response to RESA and NRG Set I, No.  
23 12).

1 **Q. WHAT IS THE ESTIMATED COST OF THE EV CHARGING STATION**  
2 **PROJECT?**

3 A. The EV charging station project is included in the FY2022 capital budget at a total  
4 project cost of \$300,000. (UGI Electric Statement No. 3 at 31). This cost is allocated in  
5 the allocated costs of service study based on the total customers in each rate class as a  
6 proportion of total customers. (UGI Electric Statement No. 6 at 42).

7 **Q. DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC'S PROPOSAL TO**  
8 **OWN AND OPERATE EV CHARGING STATIONS?**

9 A. Yes. As I noted above, based on NREL estimates of need and the current status of EV  
10 infrastructure buildout in Pennsylvania, the competitive market is not only meeting  
11 customer demand but has in fact built more than what is required based on current EV  
12 ownership. UGI Electric has failed to demonstrate any need for Utility owned or  
13 operated charging infrastructure, services that are clearly outside its core functions as a  
14 regulated utility. UGI Electric's proposed EV Program would require ratepayers to fund  
15 EV infrastructure that is owned and operated by UGI Electric, as well as subsidize certain  
16 services not necessary to the provision of safe and adequate utility services. If UGI  
17 Electric's proposal is approved, it would provide the Company an unfair advantage  
18 through use of ratepayer funds and leveraging ratepayers-funded assets to undercut  
19 participants in the competitive market.

20 The Company's status as a regulated utility also offers it access to customer data  
21 that is not currently available to participants in the competitive market. Third parties  
22 operating in the competitive market are in the business of developing products and  
23 services that include time-of-use rates. UGI Electric's access to customer-owned data  
24 should be limited to fulfilling its core functions as a regulated utility and it should not

1 include time-of-use rates which are product offerings best suited to the competitive  
2 market.

3 Innovative energy solutions such as EV infrastructure are best delivered by the  
4 competitive marketplace rather than through regulated electric distribution companies.  
5 Solution-focused retailers are better positioned than utilities to encourage the adoption of  
6 EVs.

7 **Q. DO YOU BELIEVE THAT THE COMPANY SHOULD BE ABLE TO RECOVER**  
8 **THE COST OF THE PROPOSED UTILITY-OWNED ELECTRIC VEHICLE**  
9 **CHARGING STATIONS THROUGH RATE BASE?**

10 A. No. Innovation is largely driven by competitive companies. UGI Electric’s proposal  
11 threatens to negatively impact this potential because the ability of a utility to fund  
12 projects through ratepayer dollars creates unfair competitive advantages and crowds out  
13 the ability of private companies to deploy these technologies.

14 **Q. DO YOU GIVE MUCH WEIGHT TO UGI ELECTRIC’S CLAIM THAT THERE**  
15 **ARE NO PUBLIC CHARGING STATIONS IN THE UGI ELECTRIC SERVICE**  
16 **TERRITORY?**

17 A. No, I do not. UGI Electric has a small service area within the state of Pennsylvania,  
18 serving approximately 62,000 customers in two counties. UGI Electric has failed to  
19 provide the number of registered electric vehicles in their service territory but has  
20 disclosed it is less than the State Average. (UGI Electric Statement No. 6 at 34). UGI  
21 Electric has not provided any evidence to justify the number of electric chargers required  
22 to support electric charging. UGI Electric has failed to acknowledge that 80% of charging  
23 happens at home and work. Regardless, UGI Electric’s claims are inconsequential as  
24 there are numerous publicly-available EV charging stations surrounding and near the  
25 edge of UGI Electric’s service territory. Finally, there is no evidence to support the  
26 implied claim that charging should in any way be defined by Utility service area.

1 **Q. DO YOU THINK EV CHARGING IS A DISTRIBUTION UTILITY SERVICE?**

2 A. No. EV stations use the distribution system, but they are not part of the distribution  
3 system, nor are they necessary to operate or maintain any existing distribution  
4 infrastructure. To conclude otherwise would mean that any electric consuming device  
5 may be owned and operated by a utility and the associated costs recovered from  
6 ratepayers, which is absurd. For example, a laundromat uses electricity to dry clothes.  
7 But that does not mean that laundromat should be considered distribution-related electric  
8 plant. Likewise, it would not make sense to permit utilities to invest and recover costs  
9 related to cell phone charging stations and kiosks. These simply are not traditional  
10 monopoly public utility services that customers should look to the distribution utility to  
11 provide.

12 **Q. HAVE ANY OTHER STATES CONCLUDED THAT EV CHARGING SHOULD**  
13 **NOT BE CLASIFFIED AS A UTILITY SERVICE?**

14 A. Yes, after an investigation, the Public Utilities Commission of Ohio concluded that EV  
15 charging stations “offer a type of service that is fundamentally different than the services  
16 offered by regulated utilities.”<sup>21</sup> These ‘behind-the-meter’ services operate within the  
17 sphere of a competitive marketplace and are analogous to a cellphone battery charging  
18 port at an airport that requires compensation for service.”<sup>22</sup>

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<sup>21</sup> *In the Matter of the Commission’s Investigation Into Electric Vehicle Charging Service in the State*, Case No. 20-434-EL-COI, Find and Order at 15  
<http://dis.puc.state.oh.us/TiffToPdf/A1001001A20G01B43144B00409.pdf>

<sup>22</sup> *Id.*

1        **A. Data Access Issues**

2        **Q.     PLEASE DESCRIBE UGI ELECTRIC’S CLAIM AS TO WHY IT SHOULD**  
3        **IMPLEMENT THE EV PROGRAM BECAUSE IT CAN UTILIZE CUSTOMER**  
4        **USAGE DATA.**

5        A.     UGI Electric claims that it plans to install and own EV charging stations to “gain  
6        additional first-hand metrics regarding EV charging utilization demands and usage  
7        patterns.” (UGI Electric Statement No. 3 at 29). UGI Electric identified the following  
8        goal that the Company’s proposal to own and operate EV charging stations will  
9        accomplish: “Gather charging station metrics, analytics, operational performance, and  
10       usage data, which would enable UGI Electric to promote future development of the EV  
11       marketplace.” (UGI Electric Statement No. 3 at 30).

12       **Q.     UNDER UGI ELECTRIC’S PROPOSAL, WOULD PARTICIPANTS IN THE**  
13       **COMPETITIVE MARKET FOR EV PRODUCTS AND INSTALLATIONS,**  
14       **INCLUDING RETAIL ELECTRICITY SUPPLIERS, BE PROVIDED ACCESS**  
15       **TO THE SAME CUSTOMER USAGE DATA?**

16       A.     No. Under UGI Electric’s proposal, stakeholders operating in the competitive market for  
17       EV products and installations would not be provided access to the EV charging data.

18       **Q.     PLEASE DESCRIBE THE SIGNIFICANCE OF THIS DATA TO**  
19       **PARTICIPANTS IN THE COMPETITIVE MARKET.**

20       A.     Customer usage data is critically important to engaging and educating customers about  
21       their electricity use. It is also critically important to developing individually tailored  
22       products, including time-of-use rates, and services designed to help consumers take  
23       control of their energy consumption.

24       **Q.     DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC’S POSITION**  
25       **REGARDING ACCESS TO AND UTILIZATION OF CUSTOMER-OWNED**  
26       **DATA?**

27       A.     Yes. UGI Electric’s access to customer-owned data should be limited to fulfilling its  
28       core functions in a regulated utility. An example of an appropriate use of the customer-

1 owned data would be UGI Electric utilizing the data to analyze distribution circuit  
2 capacity so that if customers on a particular circuit adopt and install EV charging  
3 infrastructure, UGI Electric can better predict when upgrades are necessary or respond to  
4 outages more quickly. As UGI Electric’s proposal does not provide third party entities  
5 that offer EV products and installations with access to customer data, UGI Electric would  
6 have an unfair advantage in offering electric EV products and installations.

7 In response to a discovery request from RESA and NRG, UGI Electric indicated  
8 that “The Company is willing to discuss the form and frequency of providing data related to  
9 EV station utilization demands and usage patterns to the public and parties to this  
10 proceeding.” (see attached RESA/NRG Exhibit DP-4, UGI Electric Response to RESA/NRG  
11 Set I, No. 9). RESA and NRG recommend that UGI Electric be required to establish, as part  
12 of this proceeding, the form and frequency of data related to EV charging station utilization  
13 that it will provide to third parties so that access to charging data is available from the outset  
14 of any Commission-approved aspect of the proposed EV program.

15 **B. Third-Party EV Charging Stations**

16 **Q. PLEASE DESCRIBE UGI ELECTRIC’S PROPOSAL FOR MAKE-READY**  
17 **INFRASTRUCTURE FOR THIRD-PARTY OWNED EV CHARGING**  
18 **STATIONS.**

19 A. UGI Electric proposes to invest, own and maintain “make-ready” charging infrastructure  
20 that will be facilitated through changes to the Company’s service extension regulations.  
21 UGI Electric Witness Taylor indicates that the “make-ready” work may include: (1) new  
22 transformer or transformer upgrades, as necessary to serve the new charging station load;  
23 (2) electric distribution service drop; (3) separate utility service meter for the charging  
24 station; (4) new electric service panel; and (5) associated conduit and conductor and  
25 ancillary equipment necessary to connect the EV charging stations to the electric grid.

1 Under UGI Electric’s proposal, the charging station owner will purchase, install and  
2 operate/maintain the charging station. (UGI Electric Statement No. 6 at 38, 40).

3 **Q. PLEASE ELABORATE ON UGI ELECTRIC’S THIRD-PARTY EV CHARGING**  
4 **STATION PROPOSAL.**

5 A. Based on a review of UGI Electric’s proposed tariff language, UGI Electric will provide  
6 make-ready infrastructure for “Qualified EV Charging Stations” available to the public.  
7 The term “Qualified EV Charging Stations” is defined to mean one (1) to four (4) DC fast  
8 charge (“DCFC”) stations of 50kW or greater supporting SAE/CCS and Tesla plugs  
9 configurations at a minimum that are located along a major highway and in a commercial  
10 retail office, hotel, or shopping location with parking for at least 100 vehicles, or located  
11 at a gas station, or in another location at UGI Electric’s discretion. The installation  
12 locations may also have one or more adjacent Level 2 charging stations. (UGI Electric  
13 Proposed Tariff Supplement No. 26, First Revised Page 17).

14 **Q. WHAT DO THE PROPOSED CHANGES TO THE COMPANY’S TARIFF**  
15 **PROVIDE?**

16 A. The proposed tariff language in Rule 5, subsections 5-1 and 5-m indicates that UGI  
17 Electric will provide all investment in establishing EV charging stations without  
18 contribution, and will install required infrastructure (conductor, transformers, services,  
19 and meters) necessary for operation. UGI Electric will provide such facilities with no  
20 customer contribution required until September 30, 2026.

21 **Q. DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC’S PROPOSAL TO**  
22 **PROVIDE MAKE-READY INFRASTRUCTURE FOR THIRD-PARTY OWNED**  
23 **EV CHARGING STATIONS?**

24 A. Yes. There is no need for the Utility to bear this burden. The competitive market has  
25 already demonstrated a willingness and expertise to build 1,596 Level 2 charging stations



1 and another 324 DC fast charging stations in the Commonwealth.<sup>23</sup> There is no need for  
2 additional Utility intervention.

3 If the Commission permits UGI Electric to provide make-ready infrastructure for  
4 third-party owned EV charging stations, I am concerned that UGI Electric’s proposal to  
5 provide the infrastructure is not competitively neutral. UGI Electric’s proposed criteria  
6 for “Qualified EV Charging Stations” attempts to micro-manage the placement and  
7 technology (which is bound to change) utilized for the third-party owned EV charging  
8 stations. It is also not clear from UGI Electric’s proposal whether third parties seeking to  
9 own and operate third-party charging stations that do not meet the criteria of “Qualified  
10 EV Charging Stations” have a means to connect to UGI Electric’s distribution system.

11 **C. Customer Education and Outreach**

12 **Q. WHAT IS THE EV EDUCATION COMPONENT OF UGI ELECTRIC’S EV**  
13 **PROGRAM PROPOSAL?**

14 A. UGI Electric proposes to provide customers education and information regarding EVs.  
15 Examples of information that would be provided include how to connect EV charging  
16 equipment, the cost of EV charging from the grid, and differences in EV charging levels.  
17 (UGI Electric Statement No. 6 at 41).

18 **Q. WHAT OUTREACH EFFORTS DOES UGI ELECTRIC PROPOSE?**

19 A. UGI Electric Witness Taylor offers that the EV Education component may include: (1) a  
20 dedicated webpage for information and details on the program; (2) communication  
21 through non-website channels such as bill inserts, television campaigns, social media,

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<sup>23</sup> Pennsylvania Electric Vehicle Roadmap: 2021 Update, Pennsylvania Department of Environmental Protection, see <https://files.dep.state.pa.us/Energy/OfficeofPollutionPrevention/StateEnergyProgram/PAElectricVehRoadmapBookletDEP5334.pdf>

1 digital and print media; (3) program collateral including UGI Electric and customer roles  
2 and requirements, program costs and benefits, customer applications, FAQs, etc.; and (4)  
3 collaboration with government and non-governmental organizations to share details  
4 regarding the program and general EV education for communities in UGI Electric's  
5 service territory. (UGI Electric Statement No. 6 at 41).

6 **Q. DO YOU HAVE ANY CONCERNS WITH UGI ELECTRIC'S PROPOSED**  
7 **CUSTOMER EDUCATION AND OUTREACH EFFORTS?**

8 A. My key concern is that UGI Electric provide accurate education to consumers. UGI  
9 Electric has failed to demonstrate an understanding of the current market dynamics, the  
10 consumer dynamics and the general forces shaping EV adoption. There are  
11 misconceptions that should be debunked so that customers feel more confident making  
12 the switch to EVs.

13 **Q. DO YOU HAVE ANY RECOMMENDATIONS REGARDING UGI ELECTRIC'S**  
14 **PROPOSED CUSTOMER EDUCATION AND OUTREACH EFFORTS?**

15 A. Yes. I recommend that UGI Electric establish a coordinated education campaign that  
16 includes participation by the Pennsylvania Public Utility Commission and third-party  
17 interested stakeholders such as suppliers and EV charging companies. A coordinated  
18 education campaign would help to ensure that messaging is competitive neutral and that  
19 the messaging is widely received.

20 **V. CONCLUSION**

21 **Q. DOES THAT COMPLETE YOUR DIRECT TESTIMONY?**

22 A. Yes.

## **Exhibit DP-1**

UGI Utilities, Inc. - Electric Division  
Docket No. R-2021-3023618  
UGI Electric 2021 Base Rate Case  
Responses to RESA-NGS Set I (1 thru 27)  
Delivered on April 23, 2021

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RESA-NGS-I-17

Request:

Reference UGI Statement No. 3, page 29, lines 18-20.

- a. What criteria will UGI utilize to evaluate whether a location should house Level 2 charger installations?
- b. When will UGI determine whether the three EV charging stations it proposes will include Level 2 chargers?

Response:

- a. The primary criteria will be location, space and access. The Company will work with the property owners that are partnering with UGI Electric to discuss the location and additional space that would be required to include additional Level 2 chargers adjacent to the DC Fast charging equipment.
- b. At this point, the Company anticipates that each location will include two Level 2 chargers.

Prepared by or under the supervision of: Eric W. Sorber

## **Exhibit DP-2**

UGI Utilities, Inc. - Electric Division  
Docket No. R-2021-3023618  
UGI Electric 2021 Base Rate Case  
Responses to OSBA Set I (1 thru 26)  
Delivered on n/a - April 5, 2021 (printing date)

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OSBA-I-21

Request:

Reference UGI Electric Statement No. 6, pages 28-44:

- a. Please explain how third party EV charging station operators will be able to compete with utility-owned stations in UGI Electric's service territory, if the non-electric capital and operating costs for utility stations are recovered in distribution rates.
- b. Please specify the tariff charges and rate schedule that will apply to Company distribution service to non-company-owned EV charging stations.
- c. Please estimate the annual billing determinants for the Company's three proposed charging stations if they were subject to rate GS-4.
- d. Please explain how the Company will obtain electric supply for service under this tariff. If default service supplies are used, how will default service customers be credited for use by company-owned EV charging stations? Are the current default service wholesale suppliers obligated to meet this load?
- e. Please explain how the Company intends to go about retaining a network provider, how the network provider will be compensated, and what its specific responsibilities will include.

Response:

- a. As discussed in UGI Electric Statement No. 3, the Direct Testimony of Eric W. Sorber, no EV charging stations exist within the service territory today; accordingly, it is unknown as to when any third party charging stations may be installed within the Company's service territory. The Company anticipates charging station pricing to be established based on prevailing market or standard pricing criteria and specifically is not proposing a cost based pricing structure for EV charging services. The Company is working with ChargePoint to evaluate related pricing criteria and factors.
- b. Third-party EV charging stations would be served under the appropriate UGI Electric Service Tariff rate schedule, as defined by the character of the power service being provided to the whole of the service location, including the number

UGI Utilities, Inc. - Electric Division  
Docket No. R-2021-3023618  
UGI Electric 2021 Base Rate Case  
Responses to OSBA Set I (1 thru 26)  
Delivered on n/a - April 5, 2021 (printing date)

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OSBA-I-21 (Continued)

and type of charging facilities at the location. Thus for non-residential applications, service may be provided under Rate GS-1, GS-4 or LP.

- c. Under the current GS-4 rate and assuming a configuration of one (1) DC Fast charge unit and two (2) Level 2 chargers (single port) per installation site, the billing determinants would consist of a customer charge of \$15/month or \$180 annually, a demand charge of \$201.60 (based on an estimated maximum demand of 79kW) or \$2,419.20 annually, and an energy charge per kWh utilized which will be a function of station utilization. The Company does not have an estimated kWh consumption figure per station developed at this time but is working with ChargePoint on understanding anticipated utilization rates.
- d. Electric supply for the charging stations will be considered Company Use supply. Accordingly, this supply is procured from all customers as a function of the line loss applied to all power deliveries to the UGI Electric system.
- e. The Company intends to install ChargePoint equipment and utilize their network services. The network services are covered under an annual fee as discussed in the response to I&E-RE-55-D(C). Network services cover the real-time monitoring and administration of the charging units including scheduled charging, analytics and reporting, pricing and automatic funds collection, energy management, driver support, and predictive maintenance and diagnosis. As the world's largest and most open charging network provider, ChargePoint is considered a best-of-breed partner by the Company for products and services.

Prepared by or under the supervision of: Eric W. Sorber

## **Exhibit DP-3**



UGI Utilities, Inc. - Electric Division  
Docket No. R-2021-3023618  
UGI Electric 2021 Base Rate Case  
Responses to RESA-NGS Set I (1 thru 27)  
Delivered on April 23, 2021

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RESA-NGS-I-12

Request:

Does UGI intend to implement an electric vehicle-specific time-of-use rate?

- a. If yes, please describe how UGI will establish the prices for the various time intervals.
- b. If yes, will the time-of-use rate be voluntary?
- c. If yes, how will the energy to be used for this purpose be procured?

Response:

- a. The Company anticipates EV charging station pricing to be established based on prevailing market or standard pricing criteria and specifically is not proposing a cost based pricing structure for EV charging services. The Company is working with ChargePoint to evaluate related pricing criteria and factors which may vary with time of use. Pricing and associated parameters are yet to be determined.
- b. Please see the response to (a) above.
- c. Please see the response to OSBA-I-21(d).

Prepared by or under the supervision of: Eric W. Sorber

## **Exhibit DP-4**

UGI Utilities, Inc. - Electric Division  
Docket No. R-2021-3023618  
UGI Electric 2021 Base Rate Case  
Responses to RESA-NGS Set I (1 thru 27)  
Delivered on April 23, 2021

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RESA-NGS-I-9

Request:

Reference UGI Electric Statement No. 3, page 29, lines 14-17, regarding Mr. Sorber's statement that the Company seeks to "gain additional first-hand metrics regarding EV charging utilization demands and usage patterns."

- a. Please describe whether the EV charging utilization and usage data will be made publicly available in real time or quasi-real time and in an anonymized fashion. If the charging usage data will not be made publicly available, please explain why.

Response:

The Company is willing to discuss the form and frequency of providing data related to EV station utilization demands and usage patterns to the public and parties to this proceeding. Ultimately, the goal of this program is to foster EV utilization in the UGI Electric service territory and a market driven expansion of EV charging infrastructure.

Prepared by or under the supervision of: Eric W. Sorber

## **Exhibit DP-5**

UGI Utilities, Inc. - Electric Division  
Docket No. R-2021-3023618  
UGI Electric 2021 Base Rate Case  
Responses to RESA-NGS Set I (1 thru 27)  
Delivered on April 23, 2021

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RESA-NGS-I-27

Request:

May a customer request a second meter to register EV charging use?

- a. If so, will there be a fee for installation of the second meter?
- b. If there will be a fee for installation of the second meter, how much will the fee be?

Response:

At this time, the UGI Electric tariff would only provide for a second meter if the customer requested and installed a separate electric service which, in this context, was solely supplying their EV charger. This service would be supplied under the applicable tariff schedule and associated charges.

Prepared by or under the supervision of: Eric W. Sorber

**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: June 7, 2021

*Danita Park*

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