



November 20, 2020

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Via email: rchiavetta@pa.gov

Re: Support for Duquesne Light Company's Electric Vehicle Time-of-Use Pilot Program
Docket No. P-2020-3019522

Dear Ms. Chiavetta:

Greenlots is pleased to submit this letter of support for the Electric Vehicle Time-of-Use ("EV-TOU") Pilot Program proposed by Duquesne Light Company ("Duquesne Light" or the "Company") in its Petition for Approval of a Default Service Plan ("Petition"), as modified by the Joint Stipulation the Company entered into with other parties and filed on September 30, 2020 ("Joint Stipulation") and as recommended for approval in the Recommended Decision of the Office of Administrative Law Judge ("Recommended Decision") in the above-referenced docket.¹

About Greenlots

Greenlots is a leading provider of electric vehicle ("EV") charging software and services committed to accelerating transportation electrification ("TE") in Pennsylvania, and a wholly owned subsidiary of Shell New Energies.

Greenlots' software, services and expertise empower industries across the globe to deploy EV charging infrastructure at scale, connecting people in a safer, cleaner, and smarter way. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing amount of the Level 2 infrastructure. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and improve system efficiency.

Greenlots serves on the board of the Alliance for Transportation Electrification, and additionally is an active member of Advanced Energy Economy (AEE) and other not-for-profit organizations

¹ See: Petition at <https://www.puc.pa.gov/pcdocs/1660693.pdf>, Joint Stipulation at <https://www.puc.pa.gov/pcdocs/1679086.pdf> and Recommended Decision at <https://www.puc.pa.gov/pcdocs/1684083.pdf>.

committed to accelerating electric transportation across Pennsylvania, the Mid-Atlantic and beyond.

Support for EV Time-of-Use Pilot

Greenlots commends the Public Utility Commission (the "Commission") for encouraging electric distribution companies ("EDCs") to offer EV-specific TOU rates, and notes that Duquesne Light's EV-TOU proposal is consistent with the Commission's encouragement.²

EVs offer significant value both to the grid and to ratepayers, particularly if the charging load is managed to optimize system capacity. As EV adoption grows and EV charging load increases, it creates the potential for EDCs to spread fixed system costs across a greater volume of kilowatt hours sold, thereby applying downward pressure to rates for all ratepayers. The key to unlocking this value is to shape load, for instance by reducing congestion and avoiding distribution capacity constraints, and, more broadly, by shifting charging away from periods of costlier peak demand towards off-peak periods when electricity is less expensive. Managing charging in this way is essential for EDCs to optimize electricity on the grid, minimize ratepayer-funded investments in otherwise unnecessary and avoidable system upgrades, and better unlock the value charging offers to the broader public.

Strategies to manage charging work best when the price of electricity sold more accurately reflects the cost of electricity on the grid at the time. Greenlots views rates such as the Company's proposed EV-TOU rate as an often appropriate first step to deliver these price signals to drivers. By encouraging drivers to charge off-peak during periods of lower demand, rates such as the Company's EV-TOU rate appropriately reward drivers for modifying their charging behavior in a way that benefits the grid.

Value of Technology-Based Managed Charging

While Greenlots supports the Company's proposed EV-TOU rate, Greenlots believes that active, technology-based managed charging best maximizes benefits to ratepayers. Technology-based strategies that leverage real-time or dynamic pricing represent more accurate instruments that can better shape, utilize and dispatch flexible EV charging loads to maximize system-wide benefits and cost reductions. Indeed, when combined with rates such as the Company's EV-TOU Pilot, technology has the potential to significantly amplify the benefits of those rates for drivers and ratepayers alike.

² *In the Matter of Investigation into Default Service and PJM Interconnection, LLC. Settlement Reforms*, Docket M-2019-3007101, Secretarial Letter at 11 (Jan. 23, 2020): "We urge all parties participating in the upcoming DSP proceedings to consider how EV specific TOU rate offerings could be made available to consumers."

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Greenlots views an EV rate as a passive instrument from the utility's standpoint, but one that requires customer awareness and active customer behavior change. On the other hand, technology-based managed charging allows the utility and/or site host to more actively manage load while enabling a more user-friendly, "set it and forget it" driver experience.

Greenlots therefore encourages the Company and the Commission to explore ways to leverage technology-based managed charging in future programs and filings.

Conclusion

Greenlots supports Duquesne Light's proposed EV-TOU Pilot and respectfully recommends approval by the Commission. The Pilot is consistent with the Commission's guidance to EDCs and builds upon the Company's sustained interest and leadership in transportation electrification. Greenlots further encourages the Company and the Commission to build on this EV-TOU Pilot by exploring the benefits of technology-based managed charging strategies, and further, to leverage Duquesne Light's resources and capabilities to accelerate deployment of EV charging infrastructure and charging stations in future programs and filings.

Sincerely,



Josh Cohen
Director, Policy