



July 25, 2018

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

Dear Secretary Chiavetta:

The Pennsylvania Department of Environmental Protection (DEP) appreciates the opportunity to comment on the Pennsylvania Public Utility Commission's Proposed Policy Statement on Third Party Electric Vehicle Charging – Resale/Redistribution of Utility Service Tariff Provisions (M-2017-2604382). Please find DEP's comments enclosed.

If you have any questions, please feel free to contact Dave Althoff, Director of the Energy Programs Office, by e-mail at dalthoff@pa.gov or by telephone at 717.783.0542.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick McDonnell". The signature is fluid and cursive, written over a white background.

Patrick McDonnell
Secretary

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Third Party Electric Vehicle Charging –
Resale/Redistribution of Utility Service
Docket No. M-2017-2604382

**COMMENTS OF THE
PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

The Pennsylvania Department of Environmental Protection (DEP) appreciates the opportunity to provide comments on the Pennsylvania Public Utility Commission’s (PUC) “Policy Statement on Third Party Electric Vehicle Charging – Resale/Redistribution of Utility Service Tariff Provisions”. DEP believes there are substantial environmental and health benefits to be gained from the promotion of electric vehicles (EV) and the build-out of EV charging station infrastructure throughout Pennsylvania. DEP commends the PUC on its forward-looking policy statement which recognizes that increasing EV adoption in Pennsylvania will require regulatory clarity.

DEP is in the process of publishing a “Pennsylvania Electric Vehicle Roadmap” (PA EV Roadmap), which was written by transportation policy consultants, in collaboration with the Drive Electric PA Coalition.¹ The PA EV Roadmap features various strategies, that if fully implemented, would require additional support from Electric Distribution Companies (EDCs). DEP believes the PUC proposed policy statement is a necessary step to supporting EVs in this evolving market, and there is more work to be done.

DEP is also involved in multi-state collaborations to promote EV adoption and EV charging in the northeast region of the United States. The Northeast Electric Vehicle Network,² a project of the Transportation & Climate Initiative, works to ensure EV drivers have a place to charge their vehicles from New England to D.C. and focuses on highway corridor public charging in the region. In addition, Northeast States for Coordinated Air Use Management (NESCAUM) published a report entitled “Northeast Corridor Regional Strategy for Electric Vehicle Charging Infrastructure 2018-2021” on May 16, 2018.³ NESCAUM’s report describes numerous opportunities to enhance and support workplace, home, destination, and public-charging infrastructure. In both multi-state examples, EDCs play an increasingly important role in accelerating EV adoption and improving air quality in the region.

¹ <http://www.dep.pa.gov/Business/Energy/OfficeofPollutionPrevention/State-Energy-Plan/Pages/Drive-Electric-PA-Coalition.aspx>

² <http://www.transportationandclimate.org/content/northeast-electric-vehicle-network>

³ <https://www.nescaum.org/documents/northeast-regional-charging-strategy-2018.pdf/>

- 1. DEP agrees with the PUC proposed policy statement that recharging an electric vehicle should not be construed as selling electricity to a residential customer defined under 66 Pa. C.S. § 1313, and thus requiring the pricing requirements defined within the code.**

DEP believes this policy and its exclusion from pricing requirements may allow for EV charging providers and EDCs to support future dynamic pricing models, resulting in an efficient use of the grid. In addition, allowing flexibility with adjustable pricing will enable EV charging providers to create a profitable business model in Pennsylvania and support EV deployment. The careful implementation of this policy may allow for future opportunities to address statewide uniformity in pricing and provide EV drivers with uniform experiences and expectations throughout the state.

- 2. DEP agrees with the PUC proposed policy statement that a process should be adopted within the tariffs for EV charging owners and operators to, at a minimum, notify EDCs in advance of EV charging installations for electric planning and process certainty.**

DEP recognizes the desire to “future proof” EV charging installations (install chargers in one power configuration, but set-up the site for future growth and power requirements). This policy statement may help EDCs and EV charging providers with long-term local distribution planning. Additionally, the policy statement should be carefully implemented to protect commercial business owners looking to install EV chargers from unexpected demand charge costs associated with a new load profile. Providing the opportunity for EDCs to take a proactive role with the EV charging site selection process is a key partnering opportunity for successful EV development across the state.

DEP supports the proposed policy statement and the PUC’s sustained work in this area. The EV market continues to grow and vehicle charging requirements change overtime. Thus, DEP believes it is essential to have flexible and transparent rules to allow this market to mature.

Thank you again for the opportunity to comment.

Sincerely,



Patrick McDonnell
Secretary