

**From:** [Melnykovych, Andrew \(PSC\)](#)  
**To:** [REDACTED]  
**Subject:** your comments in case 2019-00271 - Duke Energy Kentucky rates  
**Date:** Thursday, February 20, 2020 2:23:00 PM

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Dear Ms. Skawinski:

Thank you for your comments on the application of the Duke Energy Kentucky for an adjustment in its base rates for electric service.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

Please cite the case number in this matter, 2019-00271, in any further correspondence.

The documents in this case are available at [http://psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2019-00271](http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2019-00271).

Thank you for your interest in this matter.

**RECEIVED**  
**By PSC at 2:37 pm, Feb 20, 2020**

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovych@ky.gov](mailto:Andrew.melnykovych@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

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**From:** PSC - Consumer Web Inquiry <PSC.Consumer.Inquiry@ky.gov>  
**Sent:** Tuesday, February 18, 2020 7:35 AM  
**To:** Melnykovych, Andrew (PSC) <Andrew.Melnykovych@ky.gov>  
**Subject:** FW: Duke increase  
**Importance:** High

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**From:** Larry @ Carol Skawinski <[REDACTED]>  
**Sent:** Monday, February 17, 2020 3:38 PM  
**To:** PSC - Consumer Web Inquiry <[PSC.Consumer.Inquiry@ky.gov](mailto:PSC.Consumer.Inquiry@ky.gov)>  
**Subject:** Duke increase  
**Importance:** High

Duke, your request for 16 percent increase is ridiculous, especially in a state that is not exactly

thriving and where some live hand to mouth. I have noticed my recent bills have been what appears to be higher than normal. Perhaps you've already started hiking rates without telling anyone. Surprise! Please reconsider your rate hike increase for the good of all Kentuckians! You know, if you go through with this, those who can't afford will start using dangerous heaters, causing fires, death and destruction. Think about it, Duke. Carol Skawinski, Highland Hts.

**From:** [Melnykovych, Andrew \(PSC\)](#)  
**To:** [REDACTED]  
**Subject:** your comments in case 2019-00271 - Duke Energy Kentucky rates  
**Date:** Thursday, February 20, 2020 2:21:00 PM

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Dear Mr. & Mrs. Volpenheim:

Thank you for your comments on the application of the Duke Energy Kentucky for an adjustment in its base rates for electric service.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

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Thank you for your interest in this matter.

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovych@ky.gov](mailto:Andrew.melnykovych@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

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**From:** PSC - Consumer Web Inquiry <[PSC.Consumer.Inquiry@ky.gov](mailto:PSC.Consumer.Inquiry@ky.gov)>  
**Sent:** Tuesday, February 18, 2020 7:39 AM  
**To:** Melnykovych, Andrew (PSC) <[Andrew.Melnykovych@ky.gov](mailto:Andrew.Melnykovych@ky.gov)>  
**Subject:** FW: Duke Energy price increase

**From:** Kathy Volpenhein <[REDACTED]>  
**Sent:** Monday, February 17, 2020 11:49 PM  
**To:** PSC - Consumer Web Inquiry <[PSC.Consumer.Inquiry@ky.gov](mailto:PSC.Consumer.Inquiry@ky.gov)>  
**Subject:** Duke Energy price increase

We are writing to voice our objection to the proposed price increase Duke Energy has proposed. This price increase would be a hardship on many Kentucky residents.  
Thank you for considering our request.

Mark J Volpenhein

Katherine L. Volpenhein  
Covington, KY

**From:** [PSC - Public Information Officer](#)  
**To:** [Michael Meiners](#)  
**Subject:** your comments in case 2019-00271 - Duke Energy Kentucky rates  
**Date:** Thursday, February 20, 2020 2:20:00 PM

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Dear Mr. Meiners:

Thank you for your comments on the application of the Duke Energy Kentucky for an adjustment in its base rates for electric service.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

Please cite the case number in this matter, 2019-00271, in any further correspondence.

The documents in this case are available at [http://psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2019-00271](http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2019-00271).

Thank you for your interest in this matter.

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
Andrew.melnykovych@ky.gov  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

-----Original Message-----

From: Michael Meiners <[REDACTED]>  
Sent: Tuesday, February 18, 2020 6:31 PM  
To: PSC - Public Information Officer <PSC.Info@ky.gov>  
Subject: Duke energy rate hike 2019-00271

Regarding the Duke Energy rate hike 2019-00271,

As a Kenton county Duke Energy home owner and customer, I find this rate to be excessive and unwarranted. Please vote down this rate hike.

Mike Meiners  
Covington, KY 41017

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**From:** [Melnykovych, Andrew \(PSC\)](#)  
**To:** [Joshua Cohen](#)  
**Subject:** your comments in case 2019-00271 - Duke Energy Kentucky rates  
**Date:** Thursday, February 20, 2020 2:18:00 PM

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Dear Mr. Cohen:

Thank you for your comments on the application of the Duke Energy Kentucky for an adjustment in its base rates for electric service.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

Please cite the case number in this matter, 2019-00271, in any further correspondence.

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Thank you for your interest in this matter.

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
211 Sower Boulevard, Frankfort KY 40601  
[Andrew.melnykovych@ky.gov](mailto:Andrew.melnykovych@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

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**From:** Joshua Cohen <[REDACTED]>  
**Sent:** Thursday, February 20, 2020 11:44 AM  
**To:** Melnykovych, Andrew (PSC) <Andrew.Melnykovych@ky.gov>  
**Subject:** FW: Comments of Greenlots - Case No. 2019-00271

**\*\*CAUTION\*\* PDF attachments may contain links to malicious sites. Please contact the COT Service Desk [ServiceCorrespondence@ky.gov](mailto:ServiceCorrespondence@ky.gov) for any assistance.**

Good morning Andrew:

I submitted the attached comments via email below in the wee hours of yesterday morning. Can you confirm they were received and entered into the record?

Thanks,  
Josh

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Josh Cohen  
Director, Policy  
Greenlots

[REDACTED]  
[REDACTED]  
[www.greenlots.com](http://www.greenlots.com)

---

**From:** Joshua Cohen <[REDACTED]>  
**Date:** Wednesday, February 19, 2020 at 2:38 AM  
**To:** PSC - Public Information Officer <[PSC.Info@ky.gov](mailto:PSC.Info@ky.gov)>  
**Cc:** Joshua Cohen <[REDACTED]>  
**Subject:** Comments of Greenlots - Case No. 2019-00271

Dear Ms. Pinson:

I respectfully submit the attached written comments from Greenlots regarding Duke Energy Kentucky's proposed Electric Transportation Pilot in Case No. 2019-00271.

Please confirm receipt of this document, and let me know if I can provide any additional information.

Many thanks,  
Josh

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Josh Cohen  
Director, Policy  
Greenlots

[REDACTED]  
[REDACTED]  
[www.greenlots.com](http://www.greenlots.com)



February 19, 2020

Ms. Gwen R. Pinson  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 406001

Submitted via email: [psc.info@ky.gov](mailto:psc.info@ky.gov)

Re: Case No. 2019-00271  
Comments of Greenlots

Dear Ms. Pinson:

Greenlots submits these comments regarding Duke Energy Kentucky's ("Duke's") proposed Electric Transportation Pilot in the above-referenced docketed proceeding.<sup>1</sup>

#### About Greenlots

Greenlots is a leading provider of electric vehicle (EV) charging software and services committed to accelerating transportation electrification (TE) in Kentucky, and a wholly owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing percentage 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.

#### Summary of the proposed pilot portfolio

Duke's three-year electric transportation pilot portfolio includes five main offerings totaling \$2.834 million, as follows:

- DC Fast Charge Program: Duke proposes to install, own and operate 10 DCFC ports across 5 locations. Duke will operate the stations for 10 years.
- Electric Transit Bus Program: Duke proposes to install and own up to five charging stations to support electric transit buses and will operate them for 10 years.
- Non-Road Electrification: Duke proposes to offer incentives for 200 pieces of equipment such as electrified forklifts and airport ground service equipment.

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<sup>1</sup> Available at [https://psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?Case=2019-00271](https://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2019-00271)



- Residential EV Charging Rebate Program: Duke proposes to provide 300 \$500 rebates for residential Level 2 charging stations, and also provide up to \$500 over three years for participating in load-management events.
- Commercial EV Charging Rebate Program: Duke proposes to issue up to 160 \$2,500 rebates for commercial smart Level 2 charging stations, allocated among public (50), fleet (50), workplace (30) and multi-family (30) applications.

## Overview of Greenlots' position

Greenlots strongly supports the proposed portfolio of pilot programs and respectfully recommends approval by the Commission. Greenlots views the proposed offerings as prudent, targeted and needed utility investment that will create economic opportunity for Kentucky and have a significant beneficial impact in accelerating both the adoption of EVs and the market for EV charging infrastructure products and services. The pilots are well designed to support consumers in realizing the benefits of EVs, efficiently integrating EV load into the grid, and reducing persistent barriers to EV adoption. Furthermore, Duke's EV Pilot Program is in the public interest, will meet a need for charging infrastructure that is not currently being met by the private EV charging market, will support the development of the private EV charging market, will meaningfully increase charging options for EV drivers, and will prudently test and evaluate load management strategies in preparation for the coming growth of EVs. In addition, Duke's proposed program is aligned with recognized industry best practices and is consistent with a number of approved utility programs across the country.

## Benefits of transportation electrification

Transportation electrification offers a host of benefits to Kentuckians including cost savings, reduced emissions, job and economic growth opportunities, and more efficient utilization of the electric grid which in turn will benefit all ratepayers, even non-EV drivers.

The cost savings from driving an EV are significant. The Union of Concerned Scientists (UCS), a non-profit and non-partisan research organization, found that an EV driver in Kentucky who charges up at home pays the equivalent of \$0.61 per gallon, compared to an average statewide fuel price of \$2.37 per gallon.<sup>2</sup> These savings are magnified in rural Kentucky – rural drivers save almost \$800 a year on fuel and maintenance compared to operating a gas vehicle.

Vehicle electrification is a rapidly growing job creation opportunity, too, and not just on the coasts, but in America's heartland as well. In 2017, the electric truck startup Rivian acquired a former Mitsubishi plant in Normal, Illinois and is currently converting it into Rivian's main North American manufacturing facility. Closer to Kentucky, in December General Motors announced it was investing \$2.3 billion in a joint partnership with LG Chem to build EV batteries at a plant in

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<sup>2</sup> Available here:

[https://www.ucsusa.org/sites/default/files/attach/2019/05/State%2520Benefits%2520of%2520EVs\\_batch%25202\\_KY.pdf](https://www.ucsusa.org/sites/default/files/attach/2019/05/State%2520Benefits%2520of%2520EVs_batch%25202_KY.pdf)

Lordstown, Ohio, where GM had previously shuttered a vehicle assembly plant. These two announcements, and others like them, are breathing new life into communities that have endured serious job losses and have struggled to find their footing in a 21<sup>st</sup> century economy.

Policymakers have taken note, too. After the GM and LG Chem announcement in December, the two Ohio state senators who represent Lordstown introduced a bipartisan EV and EV charging tax credit bill. As one of the sponsors testified during the bill hearing earlier this month:

“Considering the rapid advances in electric vehicles and battery technology over the past few years, it is clear that the future of automobiles is all electric.”<sup>3</sup>

Kentuckians stand to benefit from reduced emissions, too. UCS compared emissions from gas-powered vehicles and electric vehicles in Kentucky by examining several factors such as power plant emissions, transmission loss and upstream emissions. Even after factoring in the aggregated emissions that go into producing the electricity an EV consumes, UCS found that a typical EV in Kentucky emits almost half the carbon dioxide as a new gas-powered vehicle — 2.4 metric tons of CO<sub>2</sub> compared to 4.9 metric tons.<sup>4</sup>

When it comes to the electric grid, increased EV adoption leads to increased electric load, which in turn spreads out fixed system costs across greater usage of electricity, thereby applying downward pressure on rates for all ratepayers, not just EV drivers. A recent analysis by Synapse Energy Economics examined costs and benefits associated with utility support of transportation electrification from 2012 through 2017 by two investor-owned utilities with high penetration of EVs: Pacific Gas & Electric and Southern California Edison. The study found that those two utilities' transportation electrification programs realized in excess of \$500 million in direct revenues, not including broader societal benefits, far in excess of the total costs associated with the programs.<sup>5</sup>

In Kentucky, according to projections by M.J. Bradley & Associates, the cost savings from reduced electric bills and reduced vehicle operating costs will translate to significant cumulative net benefits that that will exceed \$2.8 billion by 2050 under a moderate EV adoption trajectory assumed by the U.S. Energy Information Administration. This figure increases to \$23.2 billion under an EV adoption trajectory that reduces light-duty greenhouse gas emissions by 70-80% from current levels by 2050.<sup>6</sup>

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<sup>3</sup> See: <https://www.ohiosenate.gov/senators/obrien/news/obrien-and-rulli-testify-in-support-of-electric-vehicle-tax-credits>

<sup>4</sup> Available here: [https://www.ucsusa.org/sites/default/files/attach/2019/05/State%2520Benefits%2520of%2520EVs\\_batch%25202\\_KY.pdf](https://www.ucsusa.org/sites/default/files/attach/2019/05/State%2520Benefits%2520of%2520EVs_batch%25202_KY.pdf)

<sup>5</sup> Available here: <https://www.synapse-energy.com/sites/default/files/EV-Impacts-June-2019-18-122.pdf>

<sup>6</sup> Available here: <https://mjbradley.com/sites/default/files/KY%20PEV%20CB%20Analysis%20FINAL.pdf>

Transportation electrification represents likely the single greatest opportunity to increase and optimize the utilization of the electric grid while also delivering significant economic development and cost savings benefits to ratepayers and the state. These benefits will not happen automatically, however, and will require thoughtful and deliberate planning and programs to achieve. Indeed, failure to plan ahead and understand the likely grid impacts of EV charging will likely incur unnecessary costs in the future that could have been avoided or mitigated with proper planning in advance.

In other words, realizing the promise of transportation electrification requires more than simply adding EV load to the grid; it requires effective management of that load on the grid.

### Benefits of managed charging

The development of rates and programs that closely align electricity prices with cost—and reflect localized and systemwide grid constraints—is essential to unlock the potential of transportation electrification for the public. By using price signals to change the time at which drivers charge up their EV batteries, utilities can smooth out the load curve, shift load to off-peak periods when electricity is cheaper, and achieve more efficient utilization of the grid. Static TOU rates represent a rather blunt but in some cases appropriate beginning instrument to deliver these price signals, especially at low levels of EV market penetration. Other strategies, including managed or smart charging and real-time or dynamic pricing, represent more accurate instruments that can better shape, utilize, and dispatch flexible EV charging loads at charging stations with longer dwell times, such as residences and workplaces, to better maximize system-wide benefits and cost reductions. Other dynamic pricing instruments can also be deployed in higher power charging and shorter dwell time contexts, including DC fast charging. For these reasons, we encourage the Commission and Duke to also consider technology-facilitated smart/managed charging programs for the proposed DC Fast Charge Pilot Program in order to pilot and explore these benefits.

While potential grid impacts today may be minimal, as EV adoption grows and transportation electrification scales, regulated utilities such as Duke cannot turn on a dime and immediately deploy the necessary tools and infrastructure to effectively manage EV load on short notice. It is critical that utilities and commissions both plan now and establish foundational programs and appropriate regulatory frameworks to leverage this new technology in the near term.

Indeed, Duke's proposed pilots represent a well-designed portfolio of modest, targeted offerings to gain learnings and accelerate transportation electrification in a way that leverages the Company's core competencies to the benefit of all utility customers. In fact, Greenlots finds that the major shortcoming of the proposed portfolio is that it is too modest in scale in relation to the significant benefits that stand to be unlocked with utility investment and management, and the critical need for this investment given the factors limiting private market investment. Indeed, Greenlots is disappointed that Duke's proposed EV charging portfolio is at pilot scale, rather than at a program scale that could truly transform – not just accelerate – the market.

## State of the EV charging market in Kentucky

A competitive market for EV charging infrastructure does not exist at present in Kentucky. Instead, the situation can only be considered as a market failure. A major reason for this dynamic is the chicken-and-egg conundrum: without charging infrastructure, drivers are unlikely to purchase EVs; but without some substantive level of EV adoption, there is little to no business case to profitably deploy charging infrastructure.

Greenlots expects this dynamic will change over time as EV adoption increases: once EVs become plentiful enough in Kentucky to support a business case for private parties to profitably deploy and operate public charging infrastructure at scale, then one might more plausibly expect the market to become competitive. Indeed, Greenlots sees Duke's proposed portfolio of pilots as a critical step to help mature the market to that point sooner rather than later. At the present time, however, a competitive EV charging market in Kentucky remains aspirational.

Data confirms that a major reason why Kentucky lacks a competitive EV charging market is the low level of EV adoption. According to the Alliance of Automobile Manufacturers, battery electric vehicles (BEVs) and plug-in hybrid electric vehicles (PHEVs) accounted for only 0.07% of the state's 4,028,531 registered vehicles, and only 0.52% of the state's 149,421 vehicles sold during calendar year 2018.<sup>7</sup> Nationally, this places Kentucky in the bottom tenth for EV sales per capita (46th out of the 50 states and the District of Columbia).<sup>8</sup>

The International Council on Clean Transportation (ICCT) has determined that "electric vehicles and various types of charging infrastructure grow in unison," and that "markets with high electric vehicle uptake have at least 300 public charge points per million people."<sup>9</sup> Kentucky only has 59 public charge ports per million people. This places Kentucky in the bottom tenth (ranked 45<sup>th</sup> out of the 50 states and the District of Columbia) for public Level 2 and DCFC ports per capita.<sup>10</sup>

The relative lack of public charging infrastructure in Kentucky makes it quite clear that the private market has failed to adequately support the current EV market, let alone what will be needed to support and maximize future growth and associated benefits. The current EV market reflects early-model average PHEV and BEV ranges of approximately 75-100 miles. A common example includes the early model Nissan Leaf. These shorter-range EVs are able to rely more heavily on residential, at-home charging. Newer EVs, however, have ranges that regularly exceed 200 miles. Examples include the Chevy Bolt, Audi e-tron, Hyundai Kona, Kia Niro, and Tesla Model 3. These EVs with bigger batteries and longer ranges rely more heavily on public charging and allow EVs to be drivers' primary, rather than secondary or tertiary vehicles, thereby amplifying the infrastructure deficit that already exists in Kentucky.

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<sup>7</sup> Available here: <https://autoalliance.org/in-your-state/KY/>

<sup>8</sup> Ibid, and Atlas EV Hub: <https://www.atlasevhub.com/materials/market-data/>

<sup>9</sup> Available here: [https://theicct.org/sites/default/files/publications/Transition\\_EV\\_US\\_Cities\\_20180724.pdf](https://theicct.org/sites/default/files/publications/Transition_EV_US_Cities_20180724.pdf).

<sup>10</sup> Alliance of Automobile Manufacturers and Atlas EV Hub.

Furthermore, EVs in Kentucky are split roughly 50/50 between plug-in hybrid electric vehicles (PHEVs) and full battery electric vehicles (BEVs).<sup>11</sup> PHEVs are designed to complement their smaller batteries with gasoline engines to extend their ranges. Their design means that PHEV batteries are smaller and require less (but more frequent) charging than BEVs. According to Bloomberg New Energy Finance, PHEV sales are expected to decline in proportion to BEV sales, as battery ranges increase and BEVs become less expensive.<sup>12</sup> In other words, not only is BEV range increasing, so too is the share of BEVs within the broader EV market. Both of these factors speak to the need for significantly more public EV charging infrastructure in Kentucky.

Put simply, to Greenlots' knowledge, market conditions in Kentucky mean that private market participants deploying, owning and operating public charging infrastructure in Kentucky today will do so at a loss. This is why third-party EV charging companies and private investors are failing to deploy charging infrastructure at scale. It is why regulated electric utilities such as Duke are uniquely positioned to step in and help enable the market to reach greater maturity, while earning a reasonable rate of return.

#### Utility investment and procurement will grow the private market

Per basic economic theory, no number of competitive EV charging companies will result in a competitive market in the absence of a sufficiently large number of consumers or motivated buyers. For these reasons, at this stage in the market, utility investment in charging infrastructure – including ownership and operation of charging stations – is an appropriate and, indeed, necessary role for the utility to play. Greenlots firmly believes, as the ICCT noted in its report cited earlier, that EV adoption and the availability of EV charging infrastructure grow in unison. More charging infrastructure increases EV adoption, which increases demand for EV charging infrastructure, which increases EV adoption, and so on in a virtuous cycle.

Put simply, utility investment in charging infrastructure leads to more EV drivers, which in turn increases demand for charging, thereby supporting competition, market transformation, and improving the environment for private investment.

Importantly, Greenlots also views utility procurement of charging products and services as creating the purest form of competition that exists in the market. The wholesale-level competition that utility procurement creates allows different types of players, regardless of size or market position, to compete on a level playing field where products and services are selected based on factors such as features, function, value, and expertise. Additionally, wholesale-level competition significantly increases the likelihood of driving driving down program and charger costs when compared to individual retail transactions.

Unfortunately, it is a prevalent but inaccurate view of the market that competition can only take place at the retail level, where naturally-occurring market opportunities are limited. A focus only

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<sup>11</sup> Alliance of Automobile Manufacturers

<sup>12</sup> Available here: <https://about.bnef.com/electricvehicle-outlook/>

on the retail market historically has led to less sophisticated purchasing and planning decisions by customers with little technical knowledge or meaningful negotiating leverage.

This point is especially relevant to the two pilot programs in which Duke proposes to own charging infrastructure – the DC Fast Charge program and the Electric Transit Bus program. If the Commission were to prevent Duke from procuring its own charging infrastructure, and especially its own software management platform, the Commission would unnecessarily cause Duke to expend additional resources to integrate and manage multiple site host-selected platforms. Multiple platforms would not yield any benefits over a single platform, and indeed, would add complication to the launch, administration and evaluation of the program.

### Best practices for transportation electrification

There is no one-size-fits-all way to do transportation electrification. The right approach and framework depend on many factors and vary from state to state and commission to commission.

Despite the different approaches that programs take, a number of best practices have emerged across the industry which are reflected in a set of guiding principles known as the Transportation Electrification Accord (the “Accord”). This document was developed by a diverse and broad-based group of industry participants and other stakeholders with a goal of advancing transportation electrification in an equitable way that grows the industry without favoring one particular business model over another. Greenlots is a signatory to the Accord and recommends it for the Commission’s consideration.

As the Accord states, it “outlines how transportation electrification can be advanced in a manner that benefits all utility customers and users of all forms of transportation, while supporting the evolution of a cleaner grid and stimulating innovation and competition for U.S. companies.”<sup>13</sup>

Specifically, Greenlots invites the Commission’s attention to the Accord’s Principle No. 6:

“Under appropriate rules, it is in the public interest to allow investor-owned and publicly-owned utilities to participate in and facilitate the deployment of electric vehicle supply equipment (EVSE) and/or supporting infrastructure for residential and commercial applications in their service territories to accomplish state and local policy goals... utilities are well positioned to ensure that installed EVSE, whether owned by utilities or other parties, maximizes the public benefits of these innovations, through appropriate integration of these technologies in order to maximize electrical system benefits for all classes of customers.”

Many state regulatory commissions have approved EV programs that reflect the principles of the Accord and include utility ownership and operation of EV charging infrastructure. Examples

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<sup>13</sup> Available here: <https://www.theevaccord.com>

include Indianapolis Power & Light (IPL) in Indiana<sup>14</sup>, Avista Utilities in Washington State<sup>15</sup>, Baltimore Gas & Electric (BGE) in Maryland<sup>16</sup>, Duke Energy in Florida<sup>17</sup>, Pacific Gas & Electric (PG&E) in California<sup>18</sup>, Pacific Power in Oregon<sup>19</sup>, Portland General Electric (PGE) in Oregon<sup>20</sup>, Puget Sound Energy in Washington<sup>21</sup>, and Xcel Energy in Minnesota<sup>22</sup>.

## In Summary

Greenlots respectfully recommends the Commission's approval of Duke Energy Kentucky's proposed Electric Transportation Pilot. Transportation electrification offers many substantial benefits to Kentuckians including reduced fuel costs, increased job and economic opportunity, and better utilization of the electric grid which in turn will apply downward pressure on rates for all ratepayers. However, these benefits will not happen on their own without active and thoughtful planning and investment by regulated utilities. A major barrier hindering EV adoption is the lack of adequate EV charging infrastructure due to the lack of deployment by the private market. Utility investment is needed to accelerate deployment of infrastructure, increase EV adoption, and create favorable market conditions to attract private investment in charging infrastructure. Regulatory commissions across the country have approved EV charging programs that include utility ownership and operation of infrastructure, and, notably, utility procurement and selection of the equipment and software management platform. Indeed, a broad and diverse group of stakeholders has developed a set of best practices known as the Transportation Electrification Accord whose principles are aligned with Duke's proposed filing.

Sincerely,



Josh Cohen  
Director, Policy

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<sup>14</sup> Order issued in Case No. 43960 (IURC Nov. 22, 2011).

<sup>15</sup> Order No. 01 issued in Docket No. UE-160082 (WUTC Apr. 28, 2016).

<sup>16</sup> Order No. 88997 issued in Case No. 9478 at pp. 60-67 (MPSC Jan. 14, 2019)

<sup>17</sup> Order No. PSC-2017-0451-AS-EU issued in Docket No. 20170813-EI (FPSC Nov. 20, 2017)

<sup>18</sup> Decision No. 19-11-017 issued in Case No. A-18-07-020 (CPUC Nov. 7, 2019)

<sup>19</sup> Order No. 18075 issued in Docket No. UM-1810 (PUCO Feb. 27, 2018)

<sup>20</sup> Order No. 18045 issued in Docket No. UM-1811 (PUCO Feb. 16, 2018) and Order No. 19385 issued in Docket No. UM-1811 (PUCO Nov. 7, 2019)

<sup>21</sup> Item No. A3 issued in Docket No. UE-180877 (WUTC Dec. 13, 2018)

<sup>22</sup> Docket No. E-002/M-18-643 (MPUC Jul. 17, 2019)

**From:** [Melnykovych, Andrew \(PSC\)](#)  
**To:** [REDACTED]  
**Subject:** your comments in case 2019-00271 - Duke Energy Kentucky rates  
**Date:** Thursday, February 20, 2020 2:18:00 PM

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Dear Ms. Smith:

Thank you for your comments on the application of the Duke Energy Kentucky for an adjustment in its base rates for electric service.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

Please cite the case number in this matter, 2019-00271, in any further correspondence.

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Thank you for your interest in this matter.

Andrew Melnykovych  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
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[Andrew.melnykovych@ky.gov](mailto:Andrew.melnykovych@ky.gov)  
Direct line 502-782-2564  
Cell 502-330-5981  
Main 502-564-3940

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**From:** PSC - Consumer Web Inquiry <[PSC.Consumer.Inquiry@ky.gov](mailto:PSC.Consumer.Inquiry@ky.gov)>  
**Sent:** Thursday, February 20, 2020 7:35 AM  
**To:** Melnykovych, Andrew (PSC) <[Andrew.Melnykovych@ky.gov](mailto:Andrew.Melnykovych@ky.gov)>  
**Subject:** FW: KY PSC Utility Inquiry

**From:** KY Public Service Commission <[pscfilings@ky.gov](mailto:pscfilings@ky.gov)>  
**Sent:** Wednesday, February 19, 2020 5:40 PM  
**To:** PSC - Consumer Web Inquiry <[PSC.Consumer.Inquiry@ky.gov](mailto:PSC.Consumer.Inquiry@ky.gov)>  
**Subject:** KY PSC Utility Inquiry

Below is the result of your feedback form. It was submitted by ([REDACTED]) on  
Wednesday, February 19, 2020 at 5:40 PM

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Name: Jeannine Bell Smith  
Address: 850 Riverwatch Drive



City: Crescent Springs

State: Kentucky

Zip Code: 41017

Phone number where you can be reached: (859) [REDACTED]

Home phone: (859) [REDACTED]

Utility Name: Duke Energy Kentucky #2019-00271

State the nature of your concern: The Price We Pay #2019-00271, Electric Rate Increase 16.2%,New Traffics,Green Energy,et al. The never ending saga of Duke Energy rate increases. My goal has been to understand Duke's numerous business models of insider trading, lobbyist and middlemen.Surprisingly, along the way, I learned the money game of Duke Enterprises of price gouging and Draconian rate hikes regardless of consumers aka Ratepayers ability to pay. The heritage of public trust is threatened by Duke's business model. The profits are high but the casualties are great. Cringingly, Duke CEO rewards are based on present and future goals achieved, therefore, placing the defined goals achieved on the backs of the consumers aka Ratepayers.. This is an issue that demands a thorough and intense investigation by the Public Service Commission. Insider Trading of Duke Energy CEOs and independent directors aka Corporate Welfare is alive and well.. Over the past 14 years, insiders at Duke Energy have traded over \$116,812,542 worth of Duke Stock and bought 103,478 units worth \$4,297,678. The most active insider traders: James E. Rogers, Michael j. Angelakyis and Harris E.Jr Deloach. On average , Duke executives and independent directors trade stock every 11 days with the average trade worth \$540,934,934. Douglas F. Esamann traded 4,430 units of Duke, DUK stock worth \$409.509. Duke Energy requesting the PSC to increase the base rate by \$45.6 million ! Why is Duke Energy Kentucky requesting an increase of 16.2% you may ask? \*Recover Duke's multi-million dollar increase in NKY. Duke's lucrative returns on investments should be put back into the company...NOT on the BACKS of the consumers aka Ratepayers! \*Building a 5.5 megawatts battery storage project to enhance voltage of the Grid. \*Duke supports the Green New Deal recommended by AOC and cohorts. \*Study the impact of electric vehicles charging stations. \*Provide FAST-Charging systems for electric buses, forklifts, airport services, residential and commercial charging stations. \*LED street lighting et al.(FYI, our city taxes pay for the street lighting.) \*Possibly, remove the convenience fee of \$1.50 for paying your energy bill. Duke should reward the Ratepayers not charge a convenience. Does Duke out source payment to a third party billing group? Would like to know the answer. Close the Great Divide: Fair, Just and Reasonable  
Have you contacted the utility about the problem: Yes

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**From:** [PSC - Public Information Officer](#)  
**To:** [Sandra Gavin](#)  
**Subject:** your comments in case 2019-00271 - Duke Energy Kentucky rates  
**Date:** Thursday, February 20, 2020 2:25:00 PM

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Dear Ms. Gavin:

Thank you for your comments on the application of the Duke Energy Kentucky for an adjustment in its base rates for electric service.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

Please cite the case number in this matter, 2019-00271, in any further correspondence.

The documents in this case are available at [http://psc.ky.gov/PSC\\_WebNet/ViewCaseFilings.aspx?case=2019-00271](http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2019-00271).

Thank you for your interest in this matter.

Andrew Melnykovich  
Director of Communications/Public Information Officer  
Kentucky Public Service Commission  
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Main 502-564-3940

**From:** Sandra Gavin <[REDACTED]>  
**Sent:** Monday, February 17, 2020 5:23 PM  
**To:** PSC - Public Information Officer <PSC.Info@ky.gov>  
**Subject:** case 2019-00271

I am opposed to the 16.2% rate increase being requested by Duke Energy.

As a senior with fixed income that size of a rate increase causes great financial damage to my monthly income. I do everything I can to keep my costs as low as possible now and have no idea how I could cut costs any further.

I also find it highly unlikely that Duke needs that large of a rate increase since Forbes reports they had a record profit for 2018.

Please protect the citizens of Kentucky against this increase.

Sincerely

Sandra Gavin  
2475 Evergreen Dr.  
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