

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

Electronic Application of Duke Energy)	
Kentucky, Inc. For (1) An Adjustment of)	Case No.
Electric Rates; (2) Approval of New Tariffs;)	2022-00372
(3) Approval of Accounting Practices to Establish)	
Regulatory Assets and Liabilities; and (4) All)	
other Required Approvals and Relief)	

COMMENTS OF CHARGEPOINT, INC.

ChargePoint, Inc. (“ChargePoint”) provides these comments regarding Duke Energy Kentucky’s (“Duke Energy”) proposed Electric Vehicle Site Make Ready Service (“Rate 21 MRC”) and Electric Vehicle Supply Equipment (“EVSE”) Program, as requested in the Kentucky Public Service Commission’s (“Commission”) December 14, 2022 Order.¹ ChargePoint appreciates the opportunity to submit these comments and the Commission’s consideration of them in making its final determination.

ChargePoint generally supports Duke Energy’s proposed Rate 21 MRC program and EVSE Tariff. As a participant in developing utility electric vehicle (“EV”) programs in many jurisdictions, ChargePoint supports the goals and objectives of the proposed Rate 21 MRC program and EVSE Tariffs. To assist the Commission, ChargePoint respectfully offers two recommendations that will promote the goals of advancing transportation electrification while ensuring a healthy and competitive market for EV charging services.

In summary, ChargePoint recommends that the Commission:

- Adopt Duke’s Electric Vehicle Site Make Ready Service (Rate 21 MRC) proposal.

¹ See Kentucky Public Service Commission Case No. 2022-00372, Order. (December 14, 2022).

- Require any EV chargers installed through the EVSE Program to be networked (i.e., direct Duke Energy to remove references to non-networked EVSE from the Tariff).

I. About ChargePoint

ChargePoint has been creating the new fueling network to move all people and goods on electricity since 2007. ChargePoint is committed to making it easy for businesses and drivers to go electric, with a world leading EV charging network and the most complete set of charging solutions available today. ChargePoint’s cloud subscription platform and software-defined charging hardware is designed internally and includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and fleets of all kinds.

II. Comments

A. Electric Vehicle Site Make Ready Service (Rate 21 MRC).

ChargePoint generally supports the goals and objectives of the proposed Electric Vehicle Site Make Ready Service (Rate 21 MRC) to encourage and support customer adoption of EVs in its service territory. As proposed, the Rate 21 MRC program will be available on a voluntary basis to residential and non-residential customers at their premise/places of business that require improvements (make-ready infrastructure) to prepare for installation of a Level 2 or higher EV charger that is customer or third-party owned.² This is intended to defray a portion of installation costs associated with EV chargers to encourage mutually beneficial EV adoption.³

The make-ready investment model efficiently uses funds collected from ratepayers to build out the EV charging network and enables greater competition in the EV charging market. This makes it advantageous because it inspires greater innovation in the nascent charging market and

² See Direct Testimony of Cormack C. Gordon, p. 3.

³ *Id.*

applies downward pressure on rates in the long term. Further, the make-ready investment model is desirable for site hosts to be engaged in the provision of charging services and have some “skin in the game” which drives efficiency and utilization of installed EV charging infrastructure.

ChargePoint recommends the Commission authorize utility make-ready programs to support private investment in EV charging. Importantly, utility make-ready programs should not be viewed as a replacement for other available funding sources. Instead, they should be viewed as offering complimentary support to help deploy EV infrastructure across Kentucky. Accordingly, ChargePoint recommends the Commission adopt Duke Energy’s Electric Vehicle Site Make Ready Service (Rate 21 MRC) proposal as a fundamental initial step for the Commission, the utility, and the competitive market to advance transportation electrification efforts across the Commonwealth.

B. The EVSE program should require EV chargers installed through the program to be networked.

The proposed EVSE Program would provide both residential and non-residential customers with the ability to have a Level 2 or higher EVSE installed at their home or business. Once installed, the customer would pay a flat rate each month for that charger. Included in the monthly rate amount is the charger, installation and any maintenance for the charger throughout the duration of the contract.⁴ ChargePoint recommends the Commission require any EV chargers installed through the EVSE Program to be networked (i.e., direct Duke Energy to remove references to non-networked EVSE from the Tariff).

Networked charging equipment provides several important attributes that are worth noting. First, networked charging equipment has the ability to communicate with the cloud and manage

⁴ See Direct Testimony of Cormack C. Gordon Direct, p. 23.

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the charging of the electric vehicle. Second, networked chargers enable drivers to locate publicly accessible chargers and determine if the station is in use in real-time. Third, networked chargers enable the utility and third parties to have advanced load management capabilities to facilitate off-peak charging and other managed charging strategies, which will be vital to ensuring that EV charging benefits the distribution grid. Finally, a networked charger can also collect interval data to inform usage patterns and provide enhanced network communication capabilities between the EV driver and the utility, or third-party systems. These capabilities can be of significant importance to customers to enable charging, as well as to utilities and third-party providers since the networked station provides a wealth of information related to charging behaviors and load profiles.

Indeed, Duke Energy acknowledges the benefits of managed charging repeatedly in its application and supporting testimony. For example, witness Gordon states that “the best time to market managed charging options is when customers are leveraging the MRC and EVSE programs to begin their electric vehicle transition.”⁵ Gordon further states that “[t]o that end, [the Company] presents a residential time-of-use critical peak pricing rate that can provide customers with savings for managing the charging of their EVs and encourage those same customers to avoid on peak and especially critical peak hours when the electric system is most congested.”⁶

ChargePoint agrees with Duke Energy that managing EV charging load can provide significant benefits for all Kentucky customers. Requiring networked charger capabilities now will future-proof investment in EV charging infrastructure and will enable the Company, third-party

⁵ See Direct Testimony of Cormack C. Gordon, p. 6.

⁶ *Id.*

providers, vendors, and customers to reap significant benefits from increased functionality and wider future program design options.

III. Conclusion

ChargePoint appreciates the opportunity to comment and the Commission's consideration on how Kentucky can best be positioned to accelerate deployment of EV charging infrastructure throughout the Commonwealth. It is important that the Commission ensure the adoption of programs that will support a long-term sustainable and competitive market for the installation and operation of electric vehicle charging infrastructure in Kentucky. As discussed above, ChargePoint recommends that the Commission:

- Adopt Duke's Electric Vehicle Site Make Ready Service (Rate 21 MRC) proposal.
- Require any EV chargers installed through the EVSE Program to be networked (i.e., direct Duke Energy to remove references to non-networked EVSE from the Tariff).

ChargePoint looks forward to participating and contributing to future discussions with other interested parties and stakeholders on how to effectively use competitive forces to efficiently utilize federal funding to achieve widespread beneficial transportation electrification.

Respectfully submitted this 10th day of March 2023.

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