

January 21, 2020

Joel H. Peck
Clerk
State Corporation Commission
c/o Document Control Center
P.O. Box 2118
Richmond, Virginia 23218-2118

Dear Mr. Peck:

The Alliance for Transportation Electrification appreciates the opportunity to file this letter in support of Dominion Energy's proposed Smart Charging Infrastructure Pilot Program and its related Education Program in Docket No. PUR-2019-00154.

The Alliance for Transportation Electrification, a 501(c)(6) non-profit corporation, is led by utilities, electric vehicles (EV) infrastructure firms and service providers, automobile manufacturers, and EV charging industry stakeholders and affiliated trade associations. We started with 20 organizations at the launch just over a year ago. By taking a "big tent" approach to advance the industry, we have grown rapidly to include about 45 national members today and are actively engaged in regulatory proceedings such as this across the country.

Dominion Energy's filing contains several important components described in the Direct Testimony of Nathan J. Frost on behalf of Virginia Electric and Power Company beginning at page 32 filed in this Docket. The Smart Charging Infrastructure Pilot Program is one component of the Company's larger Grid Transformation Plan and also a component of its overall transportation electrification planning strategy. The Grid Transformation Plan includes a number of reliability improvements, deployment of smart meters, and a new customer information platform. These components together are not only important to the modernization of the electric grid but will benefit EV drivers in the Commonwealth of Virginia by allowing such consumers to manage their energy use better and take advantage of time of use rates.

The Infrastructure Pilot Program consists of four major components which include:

- rebates for charging investment in four segments: multi-family, workplace, direct current fast charging ("DCFC"), and transit. Rebates will be available both for make-ready investments and charging stations;
- utility-ownership of 4 charging stations as part of a rideshare partnership to encourage electrification in the rideshare segment;
- a requirement that charging infrastructure developers provide charging data to the Company that will help it to understand and manage future EV charging load to support EV adoption while minimizing the impact of EV charging on the distribution grid, and;
- an education and outreach component consisting of communications to solicit customer enrollment and ongoing communications with participants. Ongoing communications with

participants will include continued education on managed charging, surveys to obtain customer feedback, and customer service associated with participation in the Pilot Program.

First, the Alliance believes that providing rebates for charging infrastructure and make-ready will advance the Commonwealth's environmental and energy goals at a very low cost and is a low-risk model for utility investment. The Pilot also allows for market and customer participation and is small enough in scale that any claims that the potential competitive market for charging is adversely affected should be dismissed. And as the filed Testimony points out, many of these investments will benefit the low- and moderate-income communities in the Commonwealth.

Second, some stakeholders may object to utility ownership of the four charging stations focused on the ride-share market. We believe any such objections are misguided. Dominion is planning to select strategic locations not currently being served and focused specifically on a specific sub-market of charging needs. Dominion is in no way limiting third parties from installing charging stations where they wish. And as this is a Pilot, it will help assess what the needs are for utility investment and how such investment, in conjunction with third-party investment, can advance the market. There are many benefits to utility investment in this case, including advancing the use of EVs by ride share companies that would likely not be achieved without such investment.

Third, we support the requirement that those receiving rebates provide charging data to the Company. Such data will be extremely useful in helping the Company to plan future programs and investment and to scale these proposed pilot programs. And such data would not ordinarily be made available to the Company or possibly even be collected.

Fourth, the Alliance believes that education and outreach is a critical component of any utility EV pilot or program. Such outreach will ensure that potential customers are appropriately informed of how the program works and its potential benefits. Again, the Company's proposal is low cost and modest but sufficient and necessary to ensure a successful Pilot Program.

In summary, the Alliance for Transportation Electrification supports Dominion Energy's Smart Charging Infrastructure Pilot Program as filed and urges approval by the Commission. Encouraging and advancing the use of electric vehicles in the Commonwealth will have numerous environmental, social and economic benefits and supporting pilot programs during this nascent stage of market development is essential to achieving these benefits.

Respectfully submitted this 21st day of January, 2020,

Philip B. Jones

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