

**Comments of the Alliance for Transportation Electrification
on the Florida Department of Transportation
Electric Vehicle Master Plan Draft 1.2**

General Comments and Comments on Executive Summary

The Alliance for Transportation Electrification (the “Alliance” or “ATE”) is pleased to have the opportunity to comment on the latest draft (v. 1.2) of the Florida DOT’s EV Master Plan (EVMP). The Alliance, a 501(c)(6) non-profit corporation, is led by electric vehicle (EV) infrastructure firms and service providers, automobile manufacturers, utilities, and EV charging industry stakeholders and affiliated trade associations. We started with 20 organizations at the launch just over three years ago and now we have nearly 55 members nationally. We take a “big tent” approach to advance the industry and focus not just on accelerating EV charging deployments—which necessarily requires a strong utility role—but also promoting public accessibility and open standards. We are presently involved in about 25 proceedings in the States before the PSCs, state energy offices, Legislatures, Governors, state DOTs and DEPs, and other agencies.

We have organized our comments by Section of the Draft EVMP as suggested by the DOT and will comment only on those sections of the Draft where we have suggestions or concerns. In this Section of our comments, we provide some overall thoughts which are relevant to the Executive Summary of the Document as well as the Document as a whole. We will then provide some Section by Section thoughts.

First, we believe the DOT has done a superb job in reflecting the comments of stakeholders on earlier drafts of the EVMP. We were gratified to see an increased emphasis on equity considerations for example. However, there are some areas we believe that still need some additional emphasis (including equity and access) and/or reconsideration and think these also might be addressed in the Executive Summary to emphasize their importance. The Executive Summary currently addresses only the purpose and objectives of the Document. We believe it would be beneficial to place up front some of the major findings and recommendations made by the report, which would require an expansion of this Section.

Specifically, we think the following shortcomings of the Document and recommendations are key to advancing EV markets in Florida and should be addressed in the Executive Summary and throughout the Document:

EV Goals for the State of Florida. DOT suggests establishing targets for EV adoption in the “Implementation Plan and Recommendations” Section beginning at page 37. While we strongly support the establishment of goals for the State, we think they should be more aggressive, yet still feasible. The current draft is tied to Florida essentially remaining where it is. Florida is already a national leader in EV adoption, and we think only by setting more aggressive goals that the State can rally around will it continue such leadership. We believe that establishing a light-duty EV adoption goal that aligns with FDOT's aggressive market adoption projection of 35% of total vehicles on the road by 2040 would be both a feasible and reasonable aspiration. And EV goals are one of the most important recommendations of the EVMP and should definitely have a place in the Executive Summary.

Equity and Access. While the current Draft has made some strides in including equity and access considerations. We think more can and should be done. FDOT should take a lead role in working with representatives of Environmental Justice communities and other stakeholders, early and often, and ensure that they have a strong voice in electric transportation-related program planning and implementation. This necessary engagement should be a fundamental component of FDOT's program development, funding, and execution.

Specifically, the EVMP should more specifically delineate the role that low and moderate income (LMI) communities and their representatives should play in the planning and stakeholder processes discussed in the document. And the potential role of utilities in providing investments for EV infrastructure in these communities, as demonstrated by current utility pilot and other programs, should also be emphasized. And finally, the State should ensure that a fair proportion of all state funding for EV infrastructure is made in these communities.

ATE is a signatory to the letter sent to FDOT several weeks ago that more broadly discusses where the EVMP should emphasize LMI community participation.

Planning for Transportation Electrification (TE). Continued planning, especially after production of the final EVMP, is critical to the success of TE in Florida. These issues are discussed briefly on page 43 in the sub-Section on "Initiative 4: Coordinate." Planning coordination must occur among state agencies, municipalities and counties, NGOs, utilities – both public and private - and other key stakeholders. Planning coordination should also occur at the regional level to ensure that Florida's EV programs and development fit in with what is happening regionally. In addition, the importance of the development of comprehensive transportation electrification plans (or TEPs) by utilities should be mentioned in the EVMP. Such utility-led planning, either separately or in the context of other integrated grid planning, is becoming a best practice for utilities and Commissions in many jurisdictions. Accordingly, planning by both the utilities and a coordinated approach among state agencies are critical and should be discussed in the Executive Summary.

Establishment of a Transportation Electrification Coordination Council. We support the creation of a TE Coordination Council (a "TECC") by the State - housed within the DOT - and believe the EVMP should contain recommendations for such a Council. The TECC could serve as an overseer of TE planning in the State helping to oversee coordination of planning by the various entities and communicating State needs to the Governor and Legislature over time. The TECC could provide the administrative support and guidance to fund priority infrastructure investments made available by future federal or state grant programs. The TECC could also serve as a resource to local cities and counties to help in their own efforts.

Providing a Strong Role for the Utility. We were disappointed that the potential role of utility programs, investment and leadership does not receive more attention in the Draft. The Section on "Utility Regulatory Considerations" will be discussed in more detail later in our comments is especially deficient in its recognition that utilities could have an important role in advancing TE within Florida. Utility programs and investment, with associate rate incentives, can help ensure that all Florida consumers benefit from such TE programs and investment.

This role includes many options, which are reflected in the Utility case studies that the Document includes but are not incorporated into the Utility Regulatory Considerations Section or any of DOT's

recommendations. For example, the report suggests that the utility not be able to include make-ready investments in rates, even though that is potentially one of the major roles utilities can play in advancing EV charging in the state. And such investments do have major benefits to all customers of utilities. The EVMP position on make-ready investments is contrary to what many states have done across the country and unfortunately would greatly hinder the development of charging infrastructure in many cases where it is most needed, such as multi-family dwellings and low- and moderate-income areas.

The utility also has a strong role to play in ownership and operation of charging facilities – particularly for those use cases where the private market may not substantially participate – and in education and outreach. We discuss our concerns further below but believe the importance of a strong utility role should be highlighted in the report.

The Importance of Interoperability and Open Standards. The overall consumer experience in purchasing and owning EVs is ultimately critical to their success. The existence of standards and interoperability to allow customers to access charging stations of different owners and networks is critical in this regard. The draft Document makes a passing reference on page 39 to open source data collection and OCPP but the issues are more broad-ranging. The EVMP, while not necessarily going into the complex details of these issues, should at least acknowledge the importance of standards and interoperability and discuss ways in which the State might address these issues in the future, either through the PSC, through DOT stakeholder working groups, or through the proposed TECC.

Increased Emphasis on Medium- and Heavy-Duty EVs and Fleets.

In addition to these issues, we believe increased attention should be paid to electrification of medium- and heavy-duty (MHD) vehicles, including fleets, transit buses and school buses. The opportunities for savings and environmental gains in these sectors is huge, yet each of the MHD use cases present special problems and issues. The EVMP should include recommendations on how the DOT should work with fleet owners, transit systems, school bus operators, and local governments to remove some of the barriers (some of which are mentioned in the Section “Barriers to Adoption and Market Demand” in the report). And again, MHD electrification opportunities along with the FDOT’s important and useful role in facilitating the planning efforts of these multiple sectors, who really have not collaborated in planning efforts in the past, should be highlighted in the Executive Summary.

Data Collection and Analysis

We believe the Florida DOT is in the best position to collect data on EV purchases (by type) based on registration (and government procurement) data and charging station additions – perhaps at the city and county - level and make that data available for analysis. Such data is vital to understanding trends in the market, gaps in charging infrastructure, and should also help planning efforts by utilities to identify upgrades needed to utility grids. The DOT and third parties can use this data to evaluate investment priorities and market trends. And this data is currently not available in a single, easily usable format and the DOT could provide a vital service here. The DOT should recommend such a data collection and publication effort.

In the following sections, we provide comments on each Section of the EVMP where we have suggested revisions or additions.

EVMP Section on Benefits of Electric Mobility

As this Section alludes to, while natural gas is the primary source of fuel for electric generation in Florida today, that is changing fairly rapidly over time. But we think it is important for this Section to also make clear that even at today's level of emissions of greenhouse gases by utilities, the efficiency of EVs compared to ICE engines means that overall emissions will be reduced for each ICE vehicle replaced by an EV. That point is not made clearly in this Section.

The point about cost of EV ownership under "General Lack of Awareness/Education" could also be strengthened by pointing out that the initial cost of EVs, while higher than ICE vehicles, is rapidly declining and should reach parity in the next few years, and the federal tax credit is still available for many vehicles which can erase the price premium for EVs in some cases.

EVMP Section on Barriers to Adoption and Market Demand

Most prognosticators expect cost parity to occur much sooner than the noted 2025-2030 time period. For example, BloombergNEF – probably the most cited source for such projections - predicts parity between EV and ICE vehicles to be reached before 2025.¹ The Brattle Group has predicted parity by 2025,² and UBS has predicted 2024³. Others have also suggested parity within this time frame. The EVMP itself suggests in this same Section (page 8) a \$100/kWh cost of batteries by 2025, which is generally recognized as the point where EVs will reach parity with ICE vehicles. The Office of Vehicle Technologies within USDOE has set a goal of \$80/kWh for the past several years as an ultimate cost target for the industry and federal R&D programs. Recently, news reports state that the most senior official on battery development at USDOE, David Howell, has grown more confident that the industry may reach a \$70/kWh level in the near future. If so, the total cost of ownership for an EV would be 26 cents per mile compared to 27 cents for an ICE vehicle.⁴ Thus, we believe it would be much more accurate to suggest price parity occurring between 2023 and 2025.

We would add siting and permitting considerations as a barrier to EVSE infrastructure development. this is particularly important as it is an area where government focus (particularly local governments) could be extremely helpful. The EVMP does of course address these concerns, albeit briefly, in the proceeding Section.

EVMP Section on Installation Considerations

¹<https://about.bnef.com/new-energy-outlook/#toc-download>

² <https://www.utilitydive.com/news/electric-vehicle-models-expected-to-triple-in-4-years-as-declining-battery/592061/>

³ <https://cleantechnica.com/2020/10/22/ubs-predicts-ev-price-parity-in-2024/>

⁴https://www.greencarreports.com/news/1132072_report-60-kwh-battery-pack-price-will-make-evs-cheaper-than-combustion

Just one technical correction on page 9. The draft currently states “Electricity sold from publicly available EVSE infrastructure is not subject to regulation of rate, terms, or conditions.” This statement is true only for EVSE locations not owned by a public utility subject to regulation by the Florida PSC as defined by Florida statute. It is stated correctly on page 15.

EVMP Section on Fleet Advancements and Future Considerations

The Draft appears to have repeated the same considerations for HD EVs for Transit Systems, which the Alliance does not believe is correct. Transit systems and school buses are very well-suited for electrification because they almost always return to the same hub location when their route is finished. Thus, it makes little sense to place highway chargers for these fleets – they should be located at the hubs they return to upon completion of their routes.

EVMP Section on Utility Regulatory Considerations

The Alliance has the most significant concerns with this Section, beginning on page 15 of the draft EVMP which we note is new to this version of the draft Master Plan. To a large extent, this Section just presents the current landscape for utility programs and regulation across the country and in Florida. But we were disappointed that this Section seems to be quite negative or agnostic on the role of the utilities and the Public Service Commission in advancing transportation electrification in Florida in support of policies set forth by the Legislature and Governor. Reading this Section, one might get the impression that utilities and their regulator have only a peripheral role to play in advancing TE in the State. Yet nothing could be further from the truth.

The Section fails to recognize and support the benefits that a strong utility role in TE can provide. For example, programs sponsored by utilities that encourage greater EV market penetration and infrastructure development, paired with appropriate rates and load management programs. First of course is a much more vibrant market for both EV adoption and charging installations in the State. Utility investments that increase EV market penetration have the substantial benefit, when paired with programs encouraging off-peak use, of putting downward pressure on rates for all utility customers. This results from the fact that increasing customer usage in off-peak hours results in utility revenues that are greater than any increased costs that might result. The extra revenues would go towards rate reductions. Such data has been studied and documented in California.⁵ This is of course in addition to the many other benefits of EV adoption cited in the draft EVMP report.

And utilities have special characteristics that place them in an ideal position, especially to fill market gaps and ensure that all customers can take advantage of EV opportunities. Utilities, for example, have longer planning horizons and may be willing to make investments that the private sector will not. One prime example is the placement of chargers in low income or rural areas, or along highways, where

⁵<https://www.synapse-energy.com/sites/default/files/EVs-Driving-Rates-Down-8-122.pdf>

private EVSE companies may not see an immediate economic opportunity. Multi-family dwellings, which make up about one-third of Florida's housing stock (and where EV charging is particularly expensive and difficult to deploy) is another example of an EV use case that might be better served by utilities in this nascent stage of market development. And highway DCFC may be a difficult investment for non-utility EVSEs because of the high costs and low utilization but are very necessary to the advancement of TE markets.

The Alliance believes that the EVMP should make it clear that the Public Service Commission can and should take a major role in encouraging utilities to file beneficial TE plans, programs and rate designs that will help ensure that there is sufficient infrastructure in the state to meet the demands of EV owners today and in the future. Without PSC leadership or signals that new filings and utility programs are encouraged, utilities may be reluctant to offer programs that provide benefits. The current draft EVMP suggests that the PSC will just be a passive player, responding to filings by utilities as needed. We believe a more proactive approach for the PSC is needed that recognizes the policy drivers in the EVMP while using the regulatory toolbox to approve balanced programs in the public interest.

Utility programs that will help advance EV markets in FL should be based on a portfolio of approaches, which include make ready investments (providing needed equipment from the utility pole to the charging stub), rebates to third parties for installing chargers at commercial and public locations, utility ownership and operation where warranted, and education and outreach programs that help educate customers about the benefits of going electric. The three major investor-owned utilities in Florida – Florida Power & Light, Duke Energy Florida, and TECO Energy all have elements of several of these roles in existing programs that have been approved by the PSC. Significantly more attention should be paid in the Master Plan to important and critical roles utilities can play with various business models and the potentially significant benefits of utility participation in the market.

We would note that there will be one or more parties providing comments on the draft EVMP who will downplay the potential utility role or suggest that utilities be excluded from unfairly "competing" with third parties in owning charging infrastructure. The primary argument these opponents of full utility participation is that competition and the development of a third-party charging market will be stifled by a dominant utility presence. The draft EVMP also seems to adopt this premise where it states on page 16:

"There are multiple participants in the charging marketplace that face private capitalization and competition for high-usage locations. Potentially, a utility with lower capital risk provided by rate base regulation could have an advantage in the marketplace."

We have several reactions to this line of thinking and believe it is not only wrong, but counter-productive to moving the EV market forward. Utilities can and will have a major role to play in developing EV markets and infrastructure, as is evidenced in the draft EVMP where it references utility programs both within Florida and across the nation. At this stage of market development, even the statement of a regulated utility having the ability to unfairly compete or "crowd out" other players reflects a disregard for market-based realities, or a tendency by vendors and certain advocates to want to "lock in" certain business models, including proprietary systems. The Alliance believes that many market gaps exist today, and a utility presence is necessary and constructive to catalyze further development.

The market for public charging stations, particularly Level 2, for some use cases is somewhat competitive, but not nearly to the point where the competitive market acting alone will install enough chargers to meet expected future demand. But DCFC is not yet a competitive market in Florida or elsewhere. Hence a strong utility role is necessary at this nascent stage of market development to provide foundational support for these multiple segments and use cases. And in either case, there are certainly some market segments (as suggested earlier), such as rural areas (including along highways), multi-family properties, and low and moderate-income disadvantaged communities, where there is little competitive activity and the short-term business case for a third party is very challenging.

In brief, the Alliance believes there are substantial gaps in the public EV charging market today that will not be filled solely by third-party EVSPs. Also, DC fast chargers – the only segment that DEF proposes to own and operate – is likely not economical at this nascent stage of market development and a competitive market is not likely to materialize in the near term that can or will serve all use cases. Utility infrastructure investment, including both third party rebates and ownership and operation, should not be dependent on the competitiveness of the market nor be limited to specific markets. Utilities can ably and effectively complement the private or non-utility market and ensure successful EVSP deployment throughout their service territories – both in the near- and long-terms.

The draft EVMP, again, should recognize that utilities have a viable role in developing EV charging infrastructure, of course subject to approvals and regulatory oversight of the Florida PSC.

The Alliance is also particularly concerned with a statement on page 16 which concludes that “[W]ith Make-Ready installations, costs of installing the facilities connected by third-party chargers should be recovered by the utility from that third-party company.” We strongly believe that make-ready investments by utilities have benefits beyond the third-party EVSE and EV owners. Installing more chargers is an absolute necessity to gain the benefits of TE as range anxiety, even with the increased battery range of newer vehicles, is still one of the major impediments cited by consumers to purchasing an EV.

Making commercial or public charging station owners solely responsible for make-ready costs will significantly dampen the market for such chargers, which will create cascading effects to slow down the overall growth of the market. That is exactly the wrong outcome for Florida today, and would contravene both goals and recommendations included in the EVMP. Most states evaluating the issue have concluded that allowing utility make-ready investments in rate base are necessary to achieving the ratepayer and societal benefits of TE. Such make-ready investments in other States are generally encouraged and approved with timely cost recovery with a return, either in a regulatory asset (deferred accounting allowed under regulatory rules) or directly in rate base in a rate case after a prudency review. The statement in the draft also seems directly contradictory to the draft’s earlier statement that “...prematurely and narrowly defining the role of public utilities should be discouraged given the nascence of the market and the urgent need to address gaps in infrastructure.” (at page 15).

Denying recovery of all make-ready costs from ratepayers will also have disproportionate access and equity impacts. Since many low and moderate income customers live in multi-family dwellings or rental units – which typically have much higher make-ready costs – they would be the most heavily impacted if these costs can’t be recovered in rate base. We believe this sentence should be replaced with a much more positive statement such as “Approval of utility investments in make-ready, and even in ownership

and operation of charging facilities, when they can be shown to have positive benefits to all customers, should be a part of the regulatory toolbox used by the PSC to advance Florida’s TE objectives.”

The draft also fails to recognize an important component of the Commission’s ratemaking authority focusing only on the demand charge issue which in turn applies only to charging at commercial facilities. While we agree that demand charges of certain types can be a deterrent to investment in the short-term, rate design issues are much broader and more complex. While we do not recommend getting into complex rate design issues in the EVMP, we think that the PSC has critical role to play in encouraging off-peak charging by EVs. This encouragement can be achieved through rate design or through utility programs aligned with technology that provide credits or rebates for off-peak charging. The draft should emphasize the important role played by time differentiated rates, utility programs and technologies that can ensure efficient use of the electric system and maximize benefits of electrification.

Finally, we also believe that the Master Plan overall and this Section should place a greater emphasis on the utilities developing comprehensive TE Plans to submit to the Commission, and other stakeholders, which can be updated every two or three years. Such plans create a foundational base of knowledge on all elements in the EV ecosystem, including trends in vehicle adoption, battery development, trends in managed and smart charging, best practices in other States, and others. Specific program designs and tariffs with rate design can flow from such Plans. Moreover, the FDOT in collaboration with other state and local agencies should also be encouraged to develop and continually update TE plans in cooperation with all stakeholders, that will coordinate State expenditures and grant programs that may be available in the future. The utility TE plans can be incorporated into such statewide plans, and the agencies can focus specifically focus on market gaps in either geography or market segments between the various service territories of utilities.

Finally, Florida, particularly with its emphasis on tourism, should participate in regional efforts to develop charging corridors and ensuring that interstate travel with EVs is convenient and easy.

EVMP Section on Impacts to the State Transportation Trust Fund

While the Alliance does not disagree with the calculations provided in this section, a key observation to be gained is left unstated yet is important to the short-term development of the State’s TE plans and objectives. That observation is that in the near-term, the impacts of EVs on the State Transportation Trust Fund are negligible and imposing any kind of an additional punitive tax for EV registration at this stage of market development will not only not help the Trust Fund but will harm EV sales. Florida prides itself of being a low tax state and home of economic innovation and job creation, and we believe that such punitive taxes send a negative message to the EV industry and supply chain nationally.

We are acutely aware that every state Highway or Transportation Trust Fund is facing revenue shortfalls for financing critical transportation infrastructure – but those problems are primarily due to greater vehicle efficiencies for ICE vehicles (a trend which will continue) and the lack of indexation of state gas taxes – not due to EV purchases. In the long run, the State needs to address funding deficiencies in a holistic way. EVs should pay for use of the roads and highways, but those charges should be based on

what owners of ICE vehicles of similar efficiencies pay and should not be punitive. FDOT should make this pronouncement clearly in as a recommendation the EVMP.

DOT should recommend funding studies to deal with the long-term issues of deficiencies in the Transportation Trust Fund, including the development of appropriate and fair fees for EV road usage, which could include consideration of a RUC (road user charge) or a VMT (vehicle miles travelled) fee. The studies should result in recommendations to the Legislature for comprehensive changes in the ways in which Florida highways are funded that are technology (i.e., ICE vs electric) neutral. We believe such a recommendation should be included in the EVMP.

EVMP Section Implementation Plan and Recommendations – Initiative 1: Lead

We wholeheartedly agree that Florida, with the guidance of FDOT, should “[B]ecome a leader in the support and adoption of electrified mobility and its supporting infrastructure”. And the Alliance strongly supports the adoption of EV adoption targets by the State, which will provide a signal to state agencies (including FDOT, the PSC, and the Energy Office), local governments, utilities, EVSEs and other stakeholders to conduct planning, develop programs and take actions consistent with achieving those targets. We also believe, however, that the targets proposed in the draft EVMP are not aggressive enough and do not send the right message for the State to become the “leader” it ascribes to be. Just tying targets to national sales data, particularly when Florida is already among the national leaders in EV sales does not seem to be an aspirational objective.

Rather, the ATE believes that it would be better to set a target based on EV sales in Florida, not tied to comparisons with averages in other states which may or may not be leaders. We believe that establishing a light-duty EV adoption goal that aligns with FDOT's aggressive market adoption projection of 35% of total vehicles on the road by 2040 would be both a feasible and reasonable aspiration. We would note that even this is a conservative goal, given that some states are trying to phase out ICE vehicles entirely by that date. And the number of new models being introduced by the EV manufacturers is increasing by the week and at least two major American auto manufacturers have pledged to phase out ICE vehicle sales by 2035.

The Alliance strongly agrees with the other recommendations for encouraging EV adoption in the State. FDOT should consider making its proposed tax credit available to all EV fleet operators and all types of vehicles, not just rental car fleets – which would greatly expand fleet adoption. Consideration should also be given to incentives for TNCs (such as Uber and Lyft) to electrify – particularly since they are heavily used by LMI communities. And this Section may also be a good place to recommend the array of utility programs also designed to encourage EV adoption mentioned earlier in our comments.

This Section may also be the place where the FDOT can make recommendations on next steps – where do we go from here and how does FDOT continue to “Lead” the effort. Specifically, we recommend that FDOT develop a public/private Transportation Electrification Coordination Commission which would have responsibilities for coordinating planning among all the parties to reach the State’s goals, regional planning to ensure a regional network is designed to facilitate interstate travel and tourism in Florida, specifically planning for emergency evacuation and other requirements of SB 7018 – the Essential State

Infrastructure Bill, and prioritizing any state or federal funding that becomes available for EV market development or infrastructure. members of the Commission should include state and local government officials, the PSC, members and/or representatives of low and moderate income communities, transit agencies, school bus operators, planning agencies, utilities, EVSEs, and NGOs.

EVMP Section Implementation Plan and Recommendations – Initiative 2: Build

We believe the recommendations in this Section are excellent. We have two areas where we believe some additional focus may be warranted.

First is the issue of standards and operability, touched on briefly in this Section. The consumer experience in charging and being able to roam the State and region using different charging stations is critical to adoption of EVs. While we acknowledge that the largest EV manufacturer still has a proprietary network that serves the needs of its customers, we think any further balkanization of the charging infrastructure and further development of proprietary networks that can only be used by “members” or customers of that EVSE should be avoided. Many states have not allowed any public funding to be used for proprietary networks, and Florida should consider that path.

The Alliance strongly supports the use of OCPP v. 1.6 referenced in the draft. We note that the OCA, the coordinator of this protocol for the back-end communication pathway from cloud to charger, is moving toward a new version 2.0. Again, the State might consider use of this open protocol to be a pre-requisite to state funding or incentives to EVSEs. And while Florida statute prohibits regulation of EVSEs as public utilities, there are additional regulations and standards that need to be developed by the State to ensure that EVSEs meet consumer protection requirements generally applicable to fueling stations and other businesses. FDOT may want to recommend Legislation (if needed) or agency action to ensure such measures are developed.

Secondly, the focus in this Section is on building new infrastructure, but perhaps just as important is ensuring that charging stations are maintained and are available when customers need them. Downtime at stations – particularly those privately owned – has been a significant problem in many States. Again, Florida, through its grant and procurement policies, and those of utilities, can help ensure that sufficient attention is paid to ongoing maintenance and operations after stations are built, either by the utility as owner and operator, or by the host site or EVSP directly or through faithful and timely implementation of a service level agreement (SLA). Again, we think the draft EVMP should provide increased emphasis on the importance of standards and interoperability.

EVMP Section Implementation Plan and Recommendations – Initiative 3: Educate

It is both significant and important that FDOT has recognized the importance of education and outreach to transportation electrification. We support all the recommendations here. But again, we believe FDOT has failed to recognize the important and vital role utilities and even other stakeholders can play in developing and implementing E&O efforts. there should be collaboration and coordination among

these efforts, perhaps through the TECC, to ensure consistent and effective messaging. And this is another area where outreach to LMI communities is vital to ensure their participation and the effectiveness of programs. The draft should be revised to recognize the key role of the utility and other stakeholders in E&O efforts and the importance of collaboration.

EVMP Section Implementation Plan and Recommendations – Initiative 4: Coordinate

Again, coordination is critically important, as are the planning efforts outlined in the draft EVMP. The ATE believes the importance of planning and its' critical role needs increased emphasis in the document. Specifically:

- Again, the important utility role in developing TE plans and coordination with other critical planning efforts ignored. Utilities should be encouraged to develop TE plans that help fill known gaps in the State infrastructure and help to ensure that all their customers benefit from investments. Such plans should also include proposed programs and rates that will help further state objectives.
- The EVMP should more specifically delineate the role that low and moderate income (LMI) communities and their representatives should play in the planning and stakeholder processes.
- The EVMP should be specific as to who has responsibility for overall planning and coordination of TE within Florida, which we believe should either be FDOT or the TECC, and who needs to be involved. Planning coordination must occur among state agencies (including at a minimum, FDOT, the Energy Office, and the PSC), local governments, local and regional planning agencies, LMI representatives, transit systems and school bus operators, NGOs, utilities– both public and private, - EVSE companies, and other key stakeholders.
- The EVMP should recommend that a State plan be developed and updated at regular intervals. The State plan should address all the requirements of SB7018 and future legislation, as well as any federal requirements that are developed.

We also agree that regional planning among states is important. We call FDOT's attention to a new initiative being co-sponsored by Georgia Tech and the Nicholas Institute at Duke University to develop a regional collaboration on EV issues. The effort already has several Florida NGO and utility participants, and we encourage FDOT and other Florida stakeholders to participate. This does not take the place of or suggest that a regional MOU among States is not necessary – we encourage the advancement of such a government-to-government MOU.

Finally, the draft includes discussion of the ZEV or NESCAUM MOUs. It is not clear that the draft is recommending that Florida sign onto either or whether they are just possible options. We assume it is the latter, but we suggest some clarity here as many will believe that these options are a bridge too far at this time in Florida.

We note that the Florida stakeholder group suggested in this Section could more formally become the TECC recommended earlier, or it could be a separate but coordinated activity with the TECC (maybe technical subject area groups under the umbrella of a TECC).

EVMP Section Implementation Plan and Recommendations – Initiative 5: Fund

As discussed earlier, we believe Florida should, and has time, to examine the overall issue and causes of shortfalls in Transportation Trust Fund Funding. FDOT should recommend that a study be initiated if it has not been already. In the short-term (while permanent solutions are being examined) assessing an additional registration fee on EVs is not something we oppose, provided that such a fee is fair and not punitive towards EV owners. Assessing a fee based upon the average fuel efficiency of vehicles in Florida and the average miles driven per year, would be somewhat punitive as EVs have significantly higher fuel efficiency and often driven less than average ICE vehicles. We do recognize the difficulty in developing a fair and appropriate fee, but we also oppose taking shortcuts that result in fees that may inhibit future EV sales.

Rather than making a recommendation in the EVMP we support providing options as the draft has done, although as noted below we would include only options that are viable today. We would encourage FDOT to recommend that it conduct a more comprehensive analysis of options, perhaps similar to a study done in Texas by their Department of Motor Vehicles.⁶ Such a study should include pros and cons of alternatives and should again emphasize that EV fees of any type will not solve Trust Fund shortfall problems, nor should they.

The Alliance strongly opposes fees that would be collected by electric utilities. Accordingly, we would urge you to delete the section on p 45 called “Explore utility-based fee structure.” At this stage of EV market development in Florida, we think such a line of inquiry for both public infrastructure and home-based charging would be a major distraction and introduce major technical (including metrology and its accuracy or lack thereof) and regulatory complexities as well. Based on investigations of such fees in Vermont and some other states in which we have been involved, we believe that the collection of revenue from home-based charging would be exceedingly difficult, likely inaccurate, and not produce sufficient revenues. Even at public charging stations, we believe that there are a number of technical and regulatory challenges that will be difficult to surmount, and since public charging is such a relatively small percentage of the total charging market today, sufficient revenues for the Highway Trust Fund would not be realized. Such fees would further tip the balance of economics of public charging stations. Instead, as stated earlier, we believe that the state agencies, and the Legislature, should examine alternatives such as RUC and VMT schemes. In any new scheme for a road user charge (RUC), revenue stability and predictability should be paramount goals. But this proposal does little to achieve stability; in fact, this promises to introduce significant complexity and instability for the collections for road uses. Such a proposal would also require all EV chargers to use per kWh charging to collect the fee, even if they prefer a different revenue model.

We also fully support the idea of either FDOT or the Florida Department of Highway Safety and Motor Vehicles (FDHSMV) providing a point of data collection, which should include not only locations of EV

https://d3eaozktcyjdh.cloudfront.net/cdn/ff/Xr9v-6fz2A5PionA1705nLQlp3cOoS8ZzMRmbAatXG8/1607100255/public/report-files/SB_604_AFV-Report_120120.pdf

registrations but also of charging stations to help inform planning processes and utility investments in the electric grid. This should in fact be an independent recommendation of the EVMP and should not be dependent on the FDHSMV collecting an additional fee. The FDHSMV will have this data as a result of vehicle registrations independent of whether an additional fee is assessed, and the data is vitally needed.

Finally, we note that funding from the Volkswagen Settlement, while not technically federal funding, seems to be missing from the draft's list of possible funding sources. And there are non-Federal sources of funding (e.g., NGOs) available – particularly for planning and local government activities - which should be noted in the EVMP.