

June 10, 2021

PSC EV WORK GROUP RESIDENTIAL PROGRAM DESIGN



An Exelon Company



Agenda

9:00 – 9:05	Welcome	Kristy Fleischmann Groncki
9:05 – 9:15	Equity in Transportation Electrification	National Customer Law Center – Jenifer Bosco
9:15 – 9:25	EV Telematics for grid benefits and managed charging	WeaveGrid – Apoorv Bhargava, Rachel Robinson, Mathias Bell
9:25 – 9:35	DERMS platform for grid benefits and managed charging	Energy Hub – Katelyn Schatmeyer
9:35 – 9:45	Engaging and educating customers	Plug in America – Katherine Stainken
9:45 – 9:50	Review current utility offerings	BGE – Kristy Fleischmann Groncki
9:50 – 10:30	Discuss proposals for ongoing residential engagement	All stakeholders

We will save all questions and discussion for the discussion section towards the end of the meeting. Feel free to utilize the “chat” feature to ask questions and have discussion ahead in the meantime.

Maryland EV Program Mid-Course Review

During the Q3/Q4 2020 EV Program hearing, Commissioners made several references that the mid-course review is the correct forum for proposing enhancements to the EV programs

Mid-course review:

- What is the mid-course review intended to do?
 - *“In October/November [2021], the Commission will convene a legislative-style hearing to review the progress to-date of the statewide EV Portfolio. Utility progress reports and accompanying interim evaluations will be based on data collected through [June 30, 2021] and will be filed in the docket by September 15, [2021].” - (Page. 33) Petition for Implementation of Statewide Electric Vehicle Portfolio*
- Style of mid-course: *Legislative hearing to be scheduled in October/November 2021*
- Mid-course will contain EM&V (Guidehouse) analysis and results

EV Program Design Sessions (May – July) Goal:

Gather necessary stakeholders and discuss EV program enhancements aligning and ideally developing a consensus on program enhancements to be implemented for the remaining 30 months of the programs



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Goals of Utility EV Programs

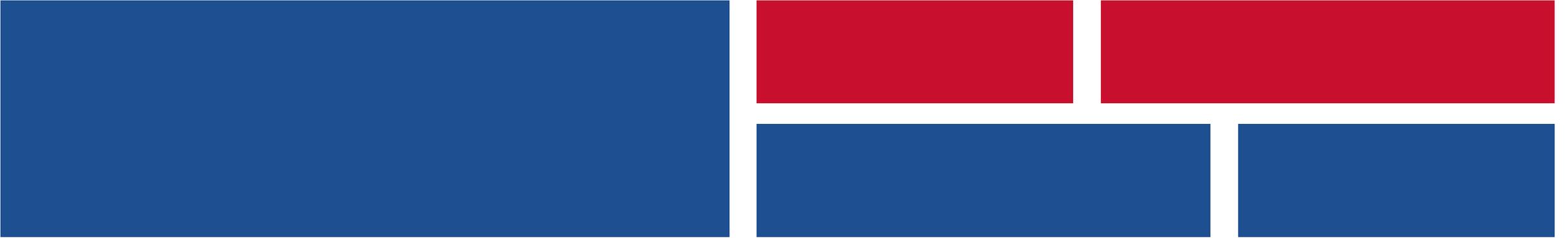
- Support Maryland ZEV goal and Greenhouse Gas Emission Reduction Act
- Commission tasked the EV Work Group in 2017 with pursuing desired outcomes that generally correspond to the following goals:
 - (1) increasing and diversifying EV tariff offerings across multiple service territories and customer classes;
 - (2) planning for a limited utility infrastructure investment in electric vehicle supply equipment (“EVSE”);
 - (3) developing a strategy to address grid-related costs associated with vehicle fleet electrification;
 - (4) facilitating and encouraging equitable access to benefits derived from vehicle fleet electrification, especially in underserved market segments; and
 - (5) developing a customer education, outreach, and engagement strategy in coordination with other state agencies to promote the outcomes of the PC44 EV Work Group proceeding.

**page 2 of Petition for Implementation of Statewide Electric Vehicle Portfolio*



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Equity in Transportation Electrification

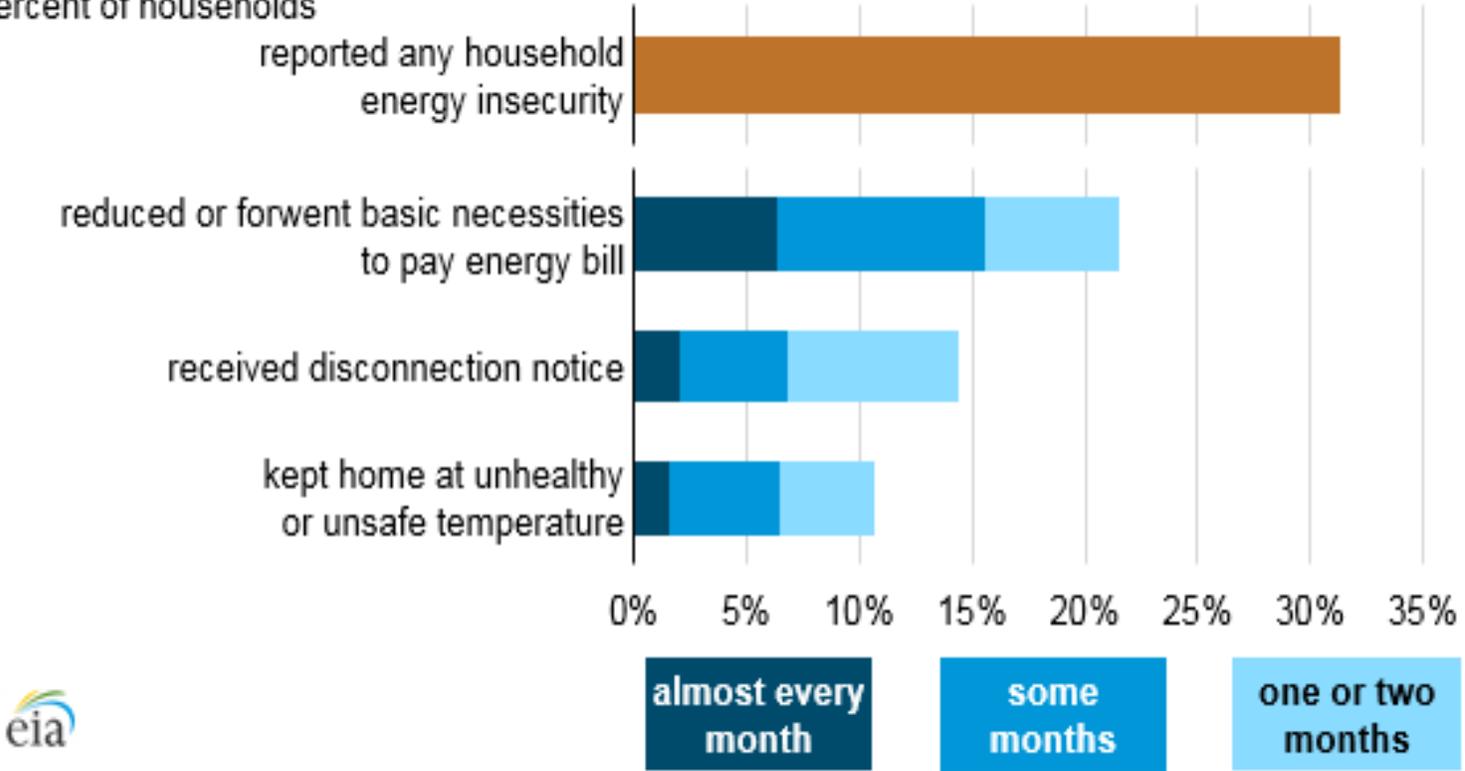


Jenifer Bosco, Staff Attorney
jbosco@nclc.org
National Consumer Law Center

Energy Affordability Challenges Before COVID-19

One in three U.S. Households that experienced energy insecure situations, 2015 challenge in mepercent of households

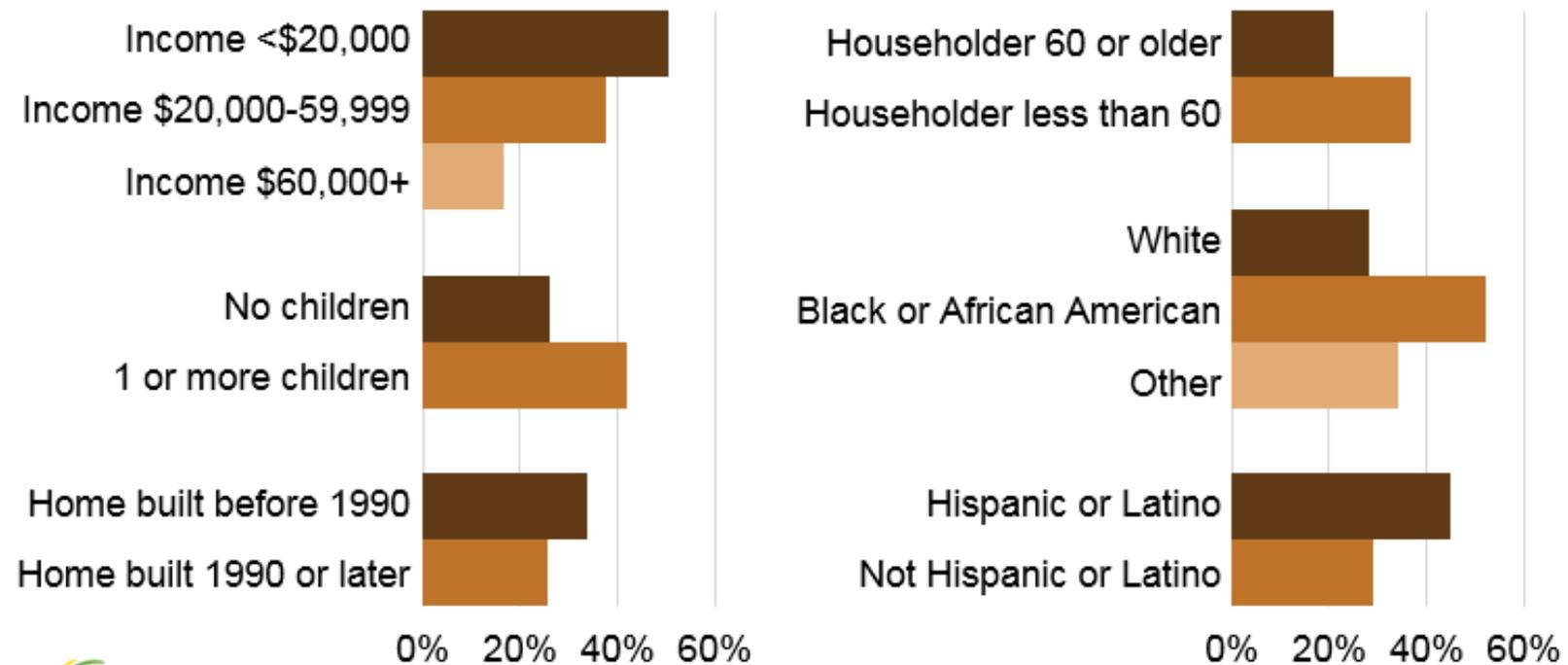
Source: U.S. EIA
Consumption Sur



Source: U.S. EIA, Residential Energy Consumption Survey 2015 (Sept. 19, 2018)

Disproportionate impacts by race and other characteristics

Household energy insecurity by household characteristics, 2015
percent of households



Source: U.S. Energy Information Administration, Residential Energy Consumption Survey 2015

Affordable electricity is necessary for the transition to EVs

- COVID-19 crisis has highlighted utility affordability issues
- Orders or voluntary guidance were issued in most states to prevent disconnection of electricity, gas and/or water service for nonpayment during crisis – but affordability concerns remain
- Consumers need affordable and accessible electric service as a precondition for beneficial electrification and transportation electrification

Equity, environmental justice and consumer protection issues in transportation electrification

- Transportation and energy needs assessments – follow the lead of communities about what is needed, how to respond (e.g., transit needs? alternatives to car ownership?)
- Ongoing process and building of relationships
- Range of stakeholders can include community action agencies, faith organizations, legal aid organizations, elder services, independent living centers, more

Additional equity considerations

- Focusing on shared uses such as school buses, public transit, shuttles for community agencies, etc. may be more of a priority to a community depending on its needs
- EVSE availability in environmental justice communities and under-resourced communities – some level of underuse may be needed now to avoid shutting out these communities in the future
- EVSE access for people with disabilities
- Digital divide also impedes access to EV tech

NCLC transportation electrification principles

Advance solutions that will --

1. Increase transportation access and security for economically disadvantaged consumers
2. Equitably allocate costs and benefits for economically disadvantaged consumers
3. Reduce air pollution to achieve public health benefits
4. Reduce emissions (state climate goals)

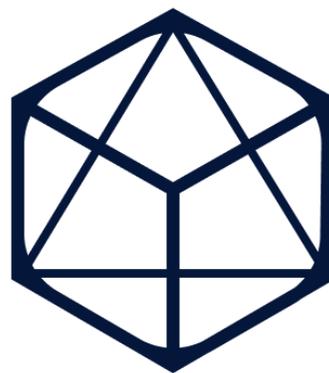
NCLC Resources

- ***The Future of Transportation Electrification: Utility, Industry and Consumer Perspectives***, LBNL FEUR Report No. 10 (2018), <https://emp.lbl.gov/projects/feur>
- ***Principles for Fair and Equitable Investment in Electric Vehicles and Transportation Electrification*** (Oct. 2018), https://www.nclc.org/images/pdf/electric_vehicles/nclc-ev-principles-oct18.pdf
- **NCLC comments re: Transportation & Climate Initiative of the Northeast and Mid-Atlantic States**, February 28, 2020
- **Making Electric Vehicles Work for Utility Consumers: A Policy Handbook for Consumer Advocates**, November 2019 by Synapse Energy Economics, Inc. with foreword by Jenifer Bosco (NCLC) and fellow advisory group members.
- COVID-19 Advocacy Resources: <https://www.nclc.org/special-projects/covid-19-consumer-protections.html>
- Major consumer protections announced in response to COVID-19: <https://library.nclc.org/major-consumer-protections-announced-response-covid-19>
- ***The Need for Utility Reporting of Key Credit and Collections Data Now and After the Covid-19 Crisis***: <http://bit.ly/brief-covid-19-data>
- Bill assistance and arrearage management program design template <https://bit.ly/RPT-covid-19-program-design>
- Electric utility residential arrearage scenarios by state [bit.ly: https://bit.ly/covid-state-electric-arrears](https://bit.ly/covid-state-electric-arrears)



National
Consumer Law
Center

Since 1969, the nonprofit **National Consumer Law Center® (NCLC®)** has worked for consumer justice and economic security for low-income and other disadvantaged people in the U.S. through its expertise in policy analysis and advocacy, publications, litigation, expert witness services, and training. www.nclc.org



WeaveGrid

June 10, 2021

About **WeaveGrid**

Deployed by industry leaders



Supported by the biggest names and experts in energy innovation



Delivered by world-class team from automotive, energy, and technology



Apoorv Bhargava
CEO



John Taggart
CTO/COO



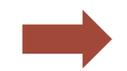
Leveraging embedded EV telematics provides optimal outcomes for utilities and customers

Features:

Data – High-quality data and control via embedded vehicle telematics in conjunction with auto OEMs

Access - No additional purchases required since telematics are embedded in > 85% of all EVs and work with any EV supply equipment

Control - Maximizes resource flexibility for the electrical grid



Benefits:

Better information (e.g., state of charge) to optimize managed charging around customer preferences

Increased program adoption and equitable access for all customers

Actively manage system constraints and avoid/defer infrastructure upgrades



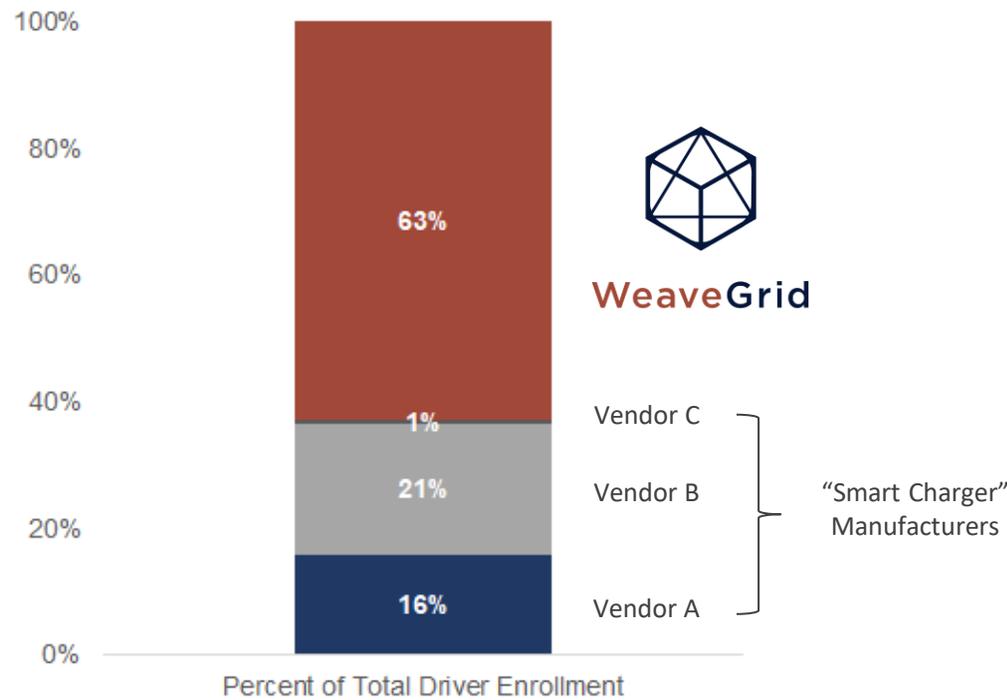
Charger-agnostic



Works with L1 and L2 Chargers

Telematics solution led to a significant enrollment increase in BGE's EVsmart rebate program

Enrolled Drivers in BGE Residential EV Rebate Program, July-Dec 2020

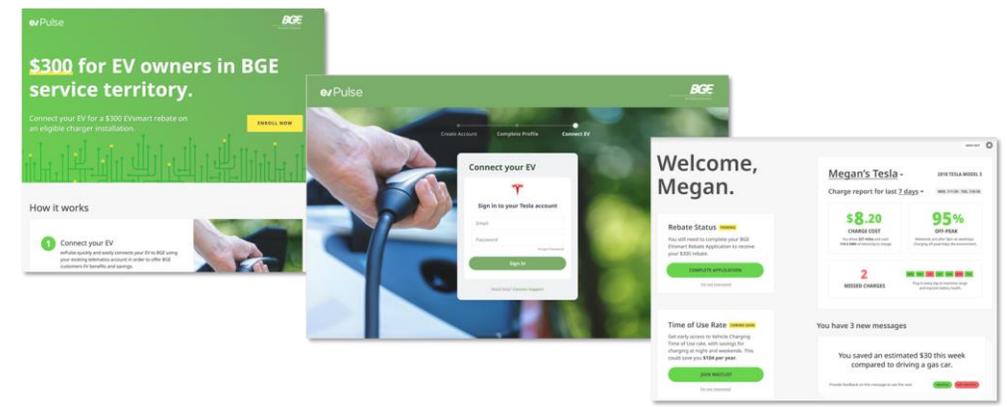


What BGE customers say about the white-labelled WeaveGrid portal:

“Simple, easy, free, \$\$”

“Nice and easy to connect - 3 steps.”

“Easy to register... Quick response time...and helps provide ideal charging times”



Source: BGE Semi-Annual Progress Report to the Maryland PSC regarding EV Programs, Jan 2021

Customer enrollment in TOU programs is important step in utilities' journeys towards active managed charging

91%

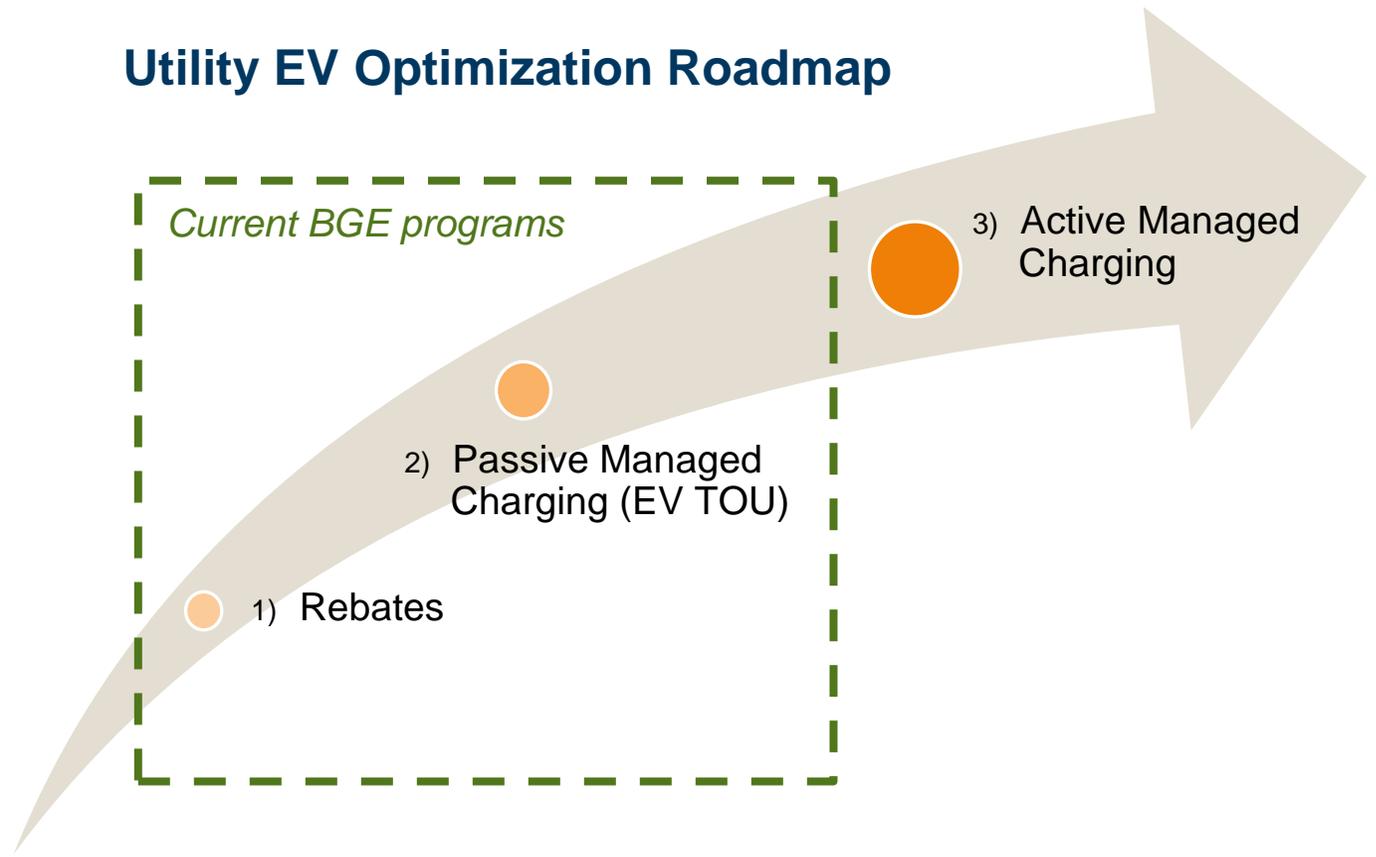
Percentage of charging done off-peak by BGE EVsmart TOU participants

VS.

82%

Percentage of charging done off-peak by BGE EVsmart customers on standard residential tariff

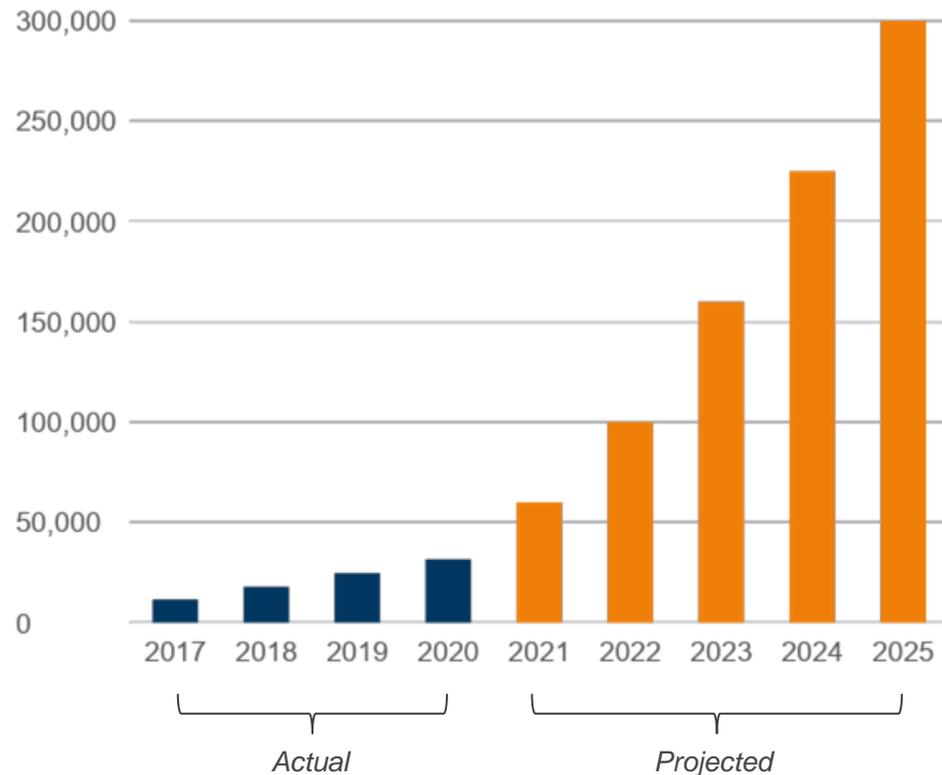
Utility EV Optimization Roadmap



Source: WeaveGrid data on 218 BGE TOU enrollments as of 6/7/2021 (61% of EV TOU program participants)

MD's aggressive EV target creates significant opportunities for utilities, but increased program adoption is required

Cumulative EV Sales in MD



- **Current programs reach <5%** out of 32,000 current EVs in Maryland
- **Achieving higher levels of adoption in EV programs is critical** to maintaining grid reliability and minimizing infrastructure upgrade costs
- Building off early momentum, **MD is poised to become one of the nation's leaders** in statewide transportation decarbonization

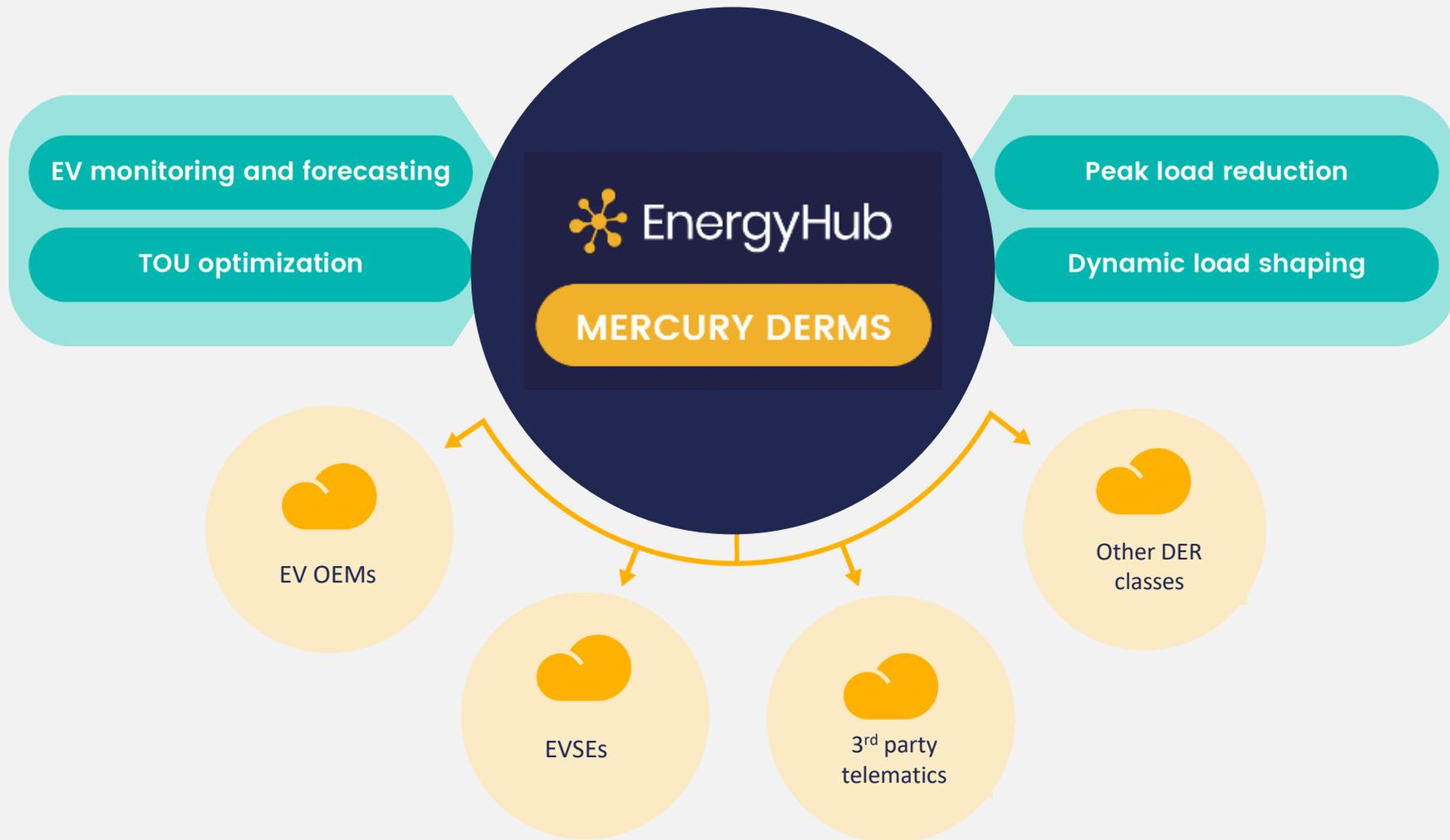


DERMS and electric vehicle growth

EnergyHub's Mercury DERMS platform transforms the complexity of grid-edge DERs into reliable grid services

Manage all classes of DERs from a single platform





Maryland utilities & EnergyHub



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- On-bill TOU rate
- Launched April 2020



- Rebate program, multifamily program, TOU incentive program moving to on-bill TOU rate
- Launched November 2019

EV load growth creates new challenges

ISSUES

Lack of visibility & access

Peak contribution

Local & TOU-driven peaks

MITIGATION

Monitoring and forecasting

TOU-enablement

Demand response

Dynamic load shaping

Phased approach to managed charging

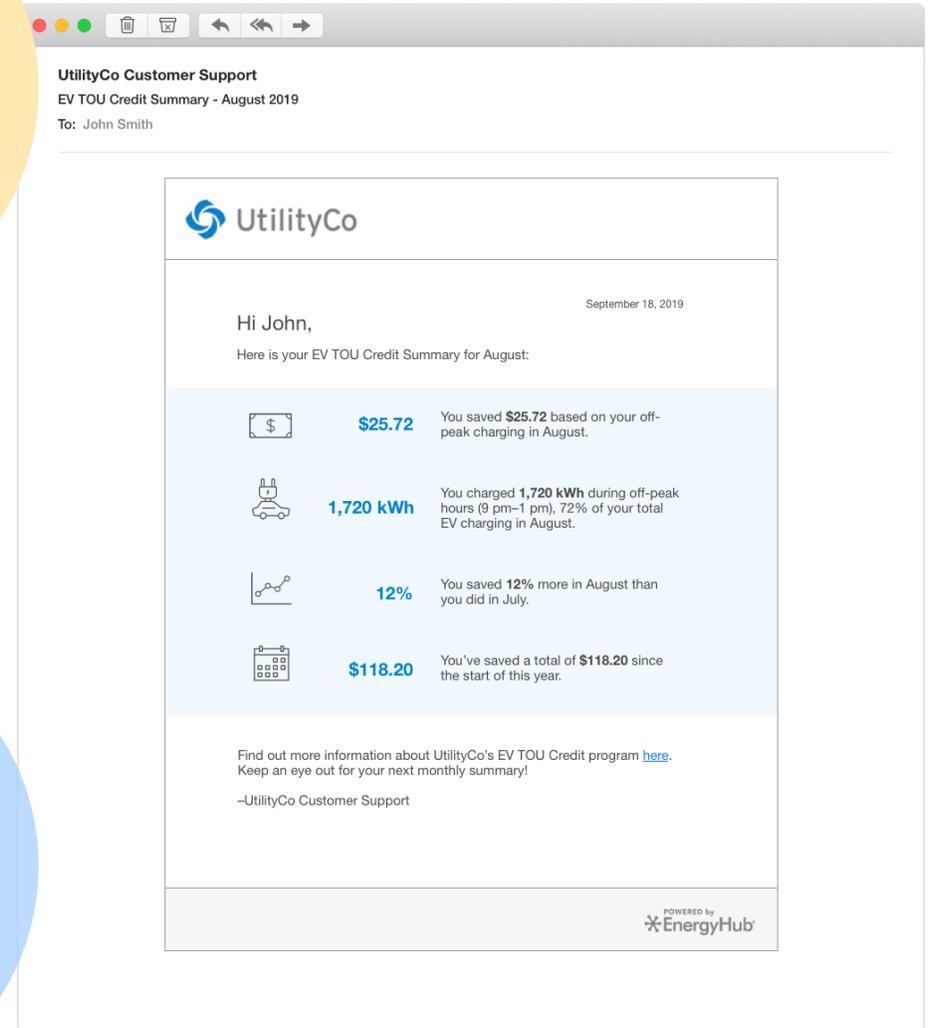
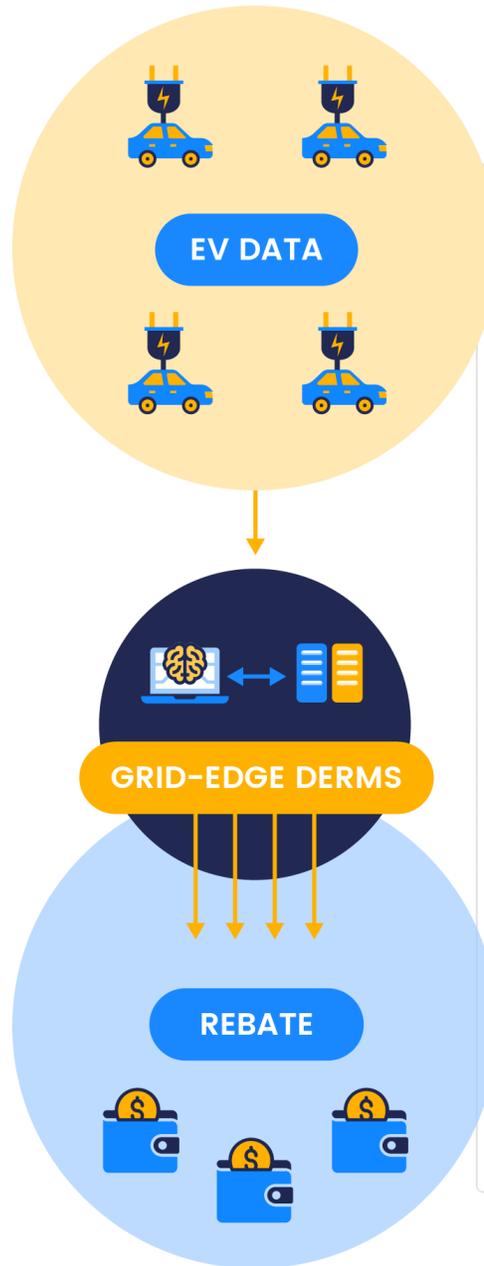


TOU management

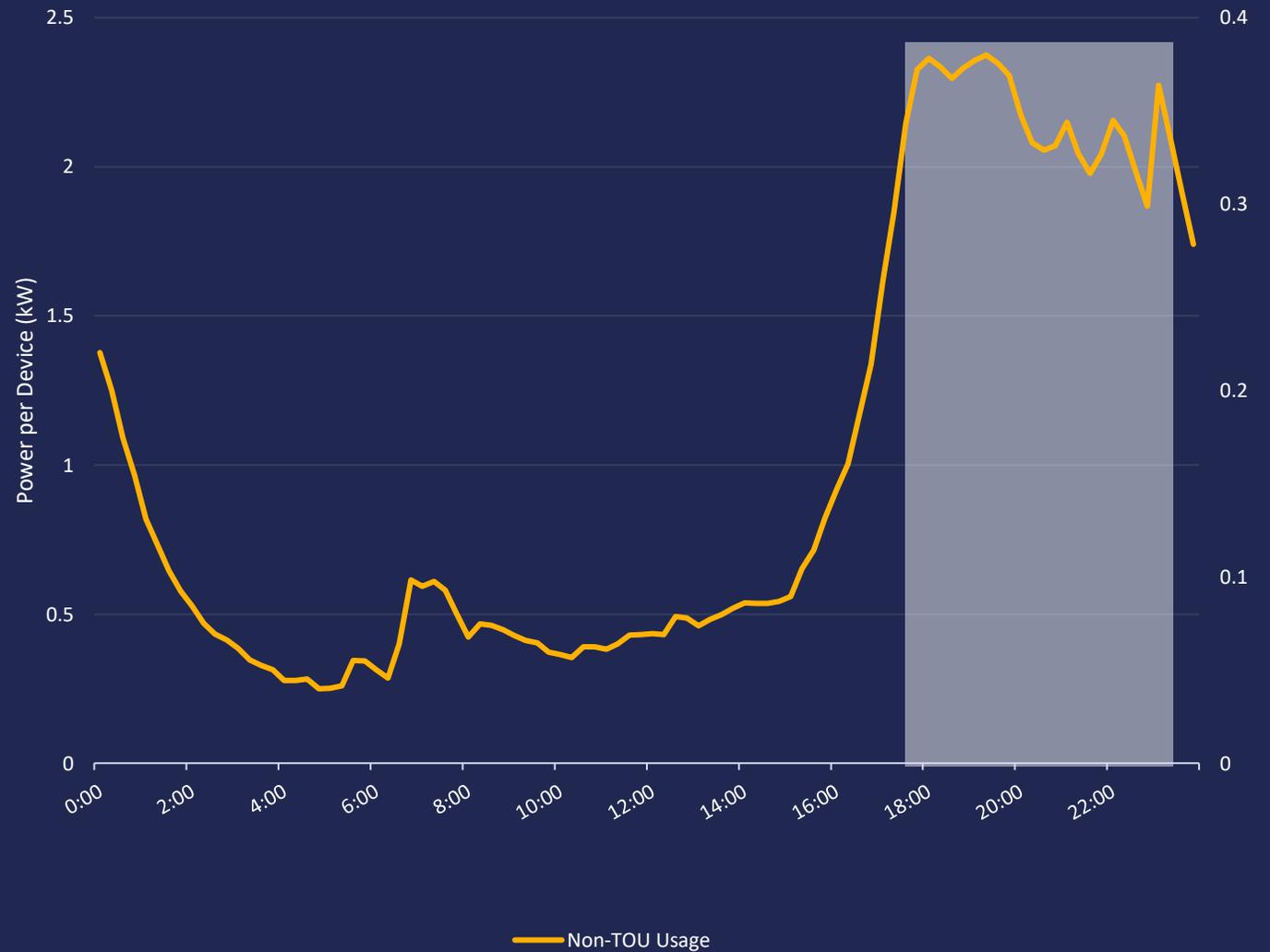


TOU-enablement

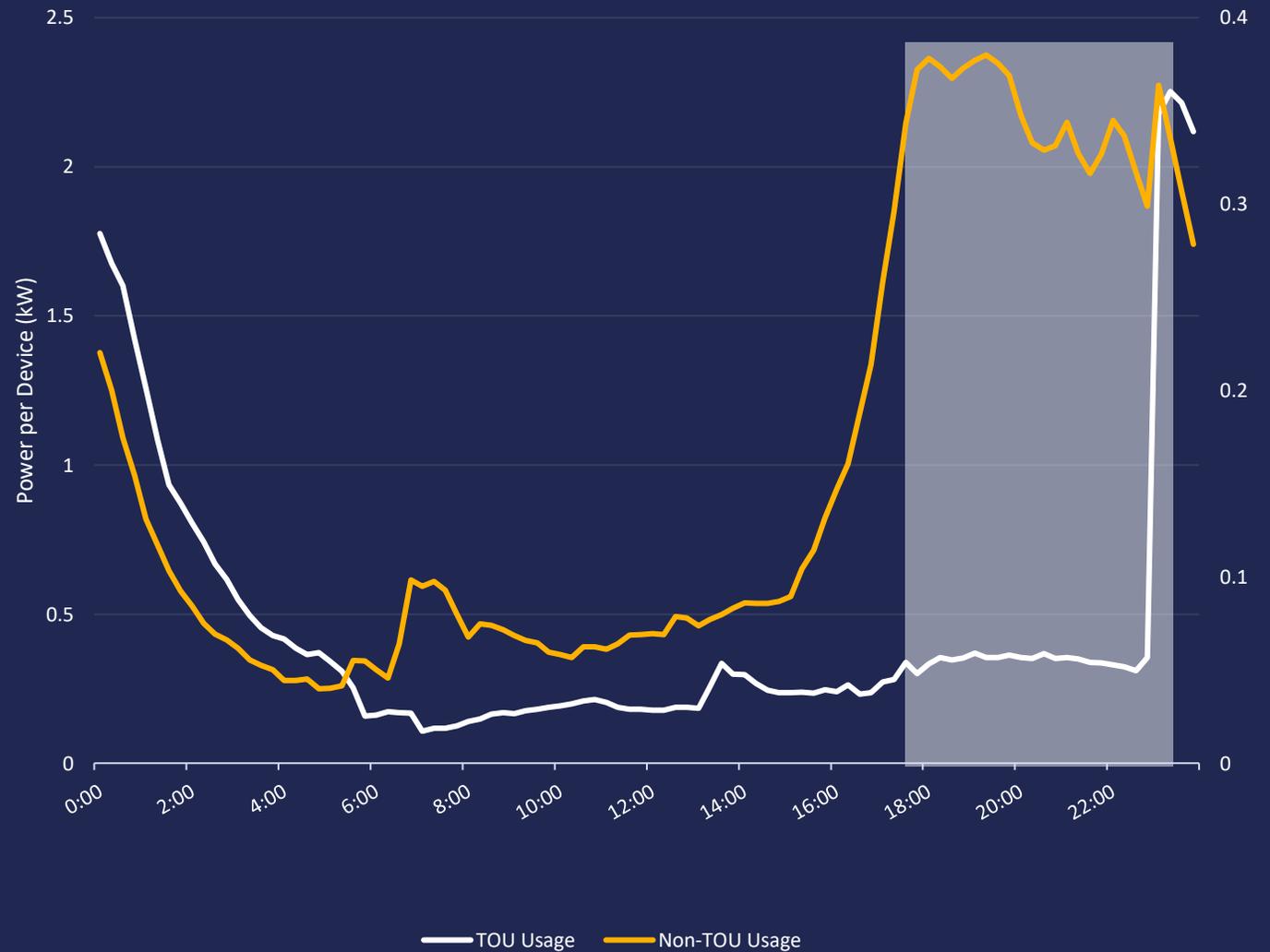
EVSE monitoring, analysis, and rebate tracking



TOU rates are effective in shifting the peak



..but they also
create a new
timer peak



Peak load reduction

Overview

Connected Solutions



2.7M residential customers



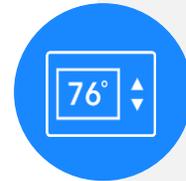
Grid-edge DERMS BYOD programs



DER situational awareness

System and feeder load relief

Managed charging



Nest

ecobee

Honeywell Home

LUX™

EMERSON

Building36.
AN ALARM.COM COMPANY

vivint.

Radio Thermostat
Company of America

ALARM.COM



-chargepoint+

enel x

solar~~edge~~



SUNRUN

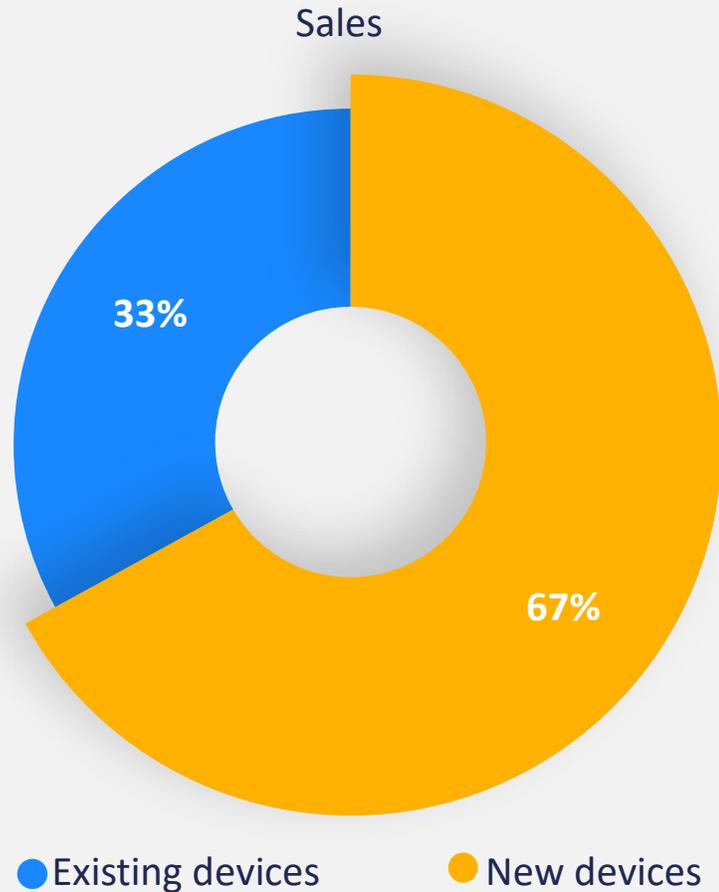
TESLA

sonnen

solar~~edge~~

GENERAC®

Utility incentives drive adoption



Earn up to \$300 from Eversource's ConnectedSolutions

If you already own an eligible EV charger, you will receive \$150 for signing up and then \$50 at the end of this year and the next two years. If you plan to purchase an eligible EV charger, you can enroll after installing and activating the charger and receive \$300 for signing up with a 3-year commitment.

[Learn more about the program](#)



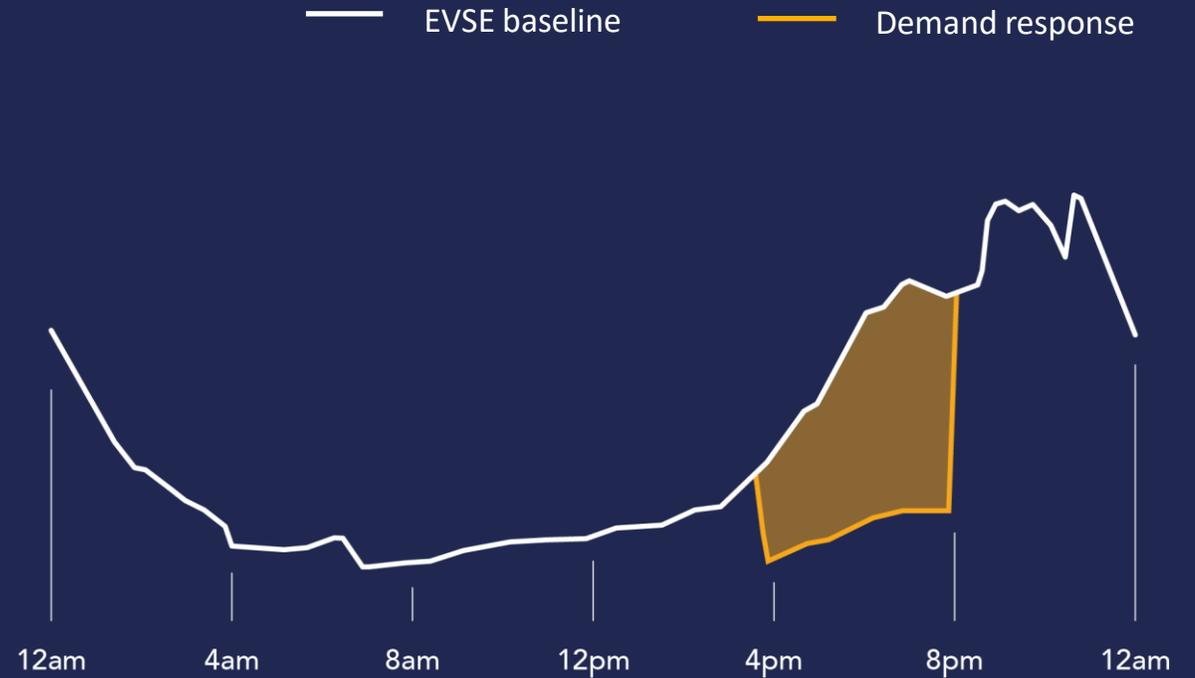
STEP ONE
Do You Qualify?

STEP TWO
Choose Your EV Charger

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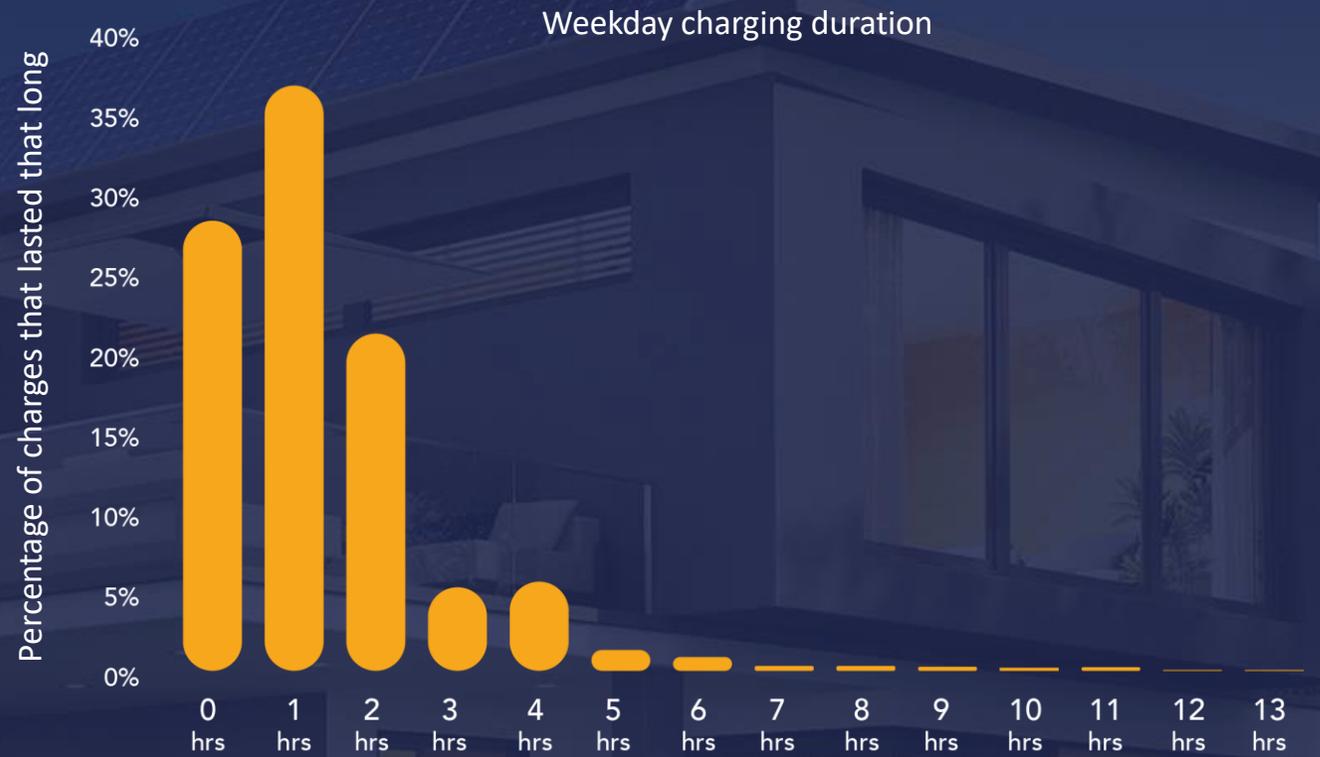
IMPACT

EV chargers as a demand management resource



*Illustration only, does not represent real data or results

Flexibility for managed charging



Source: EnergyHub, ChargePoint

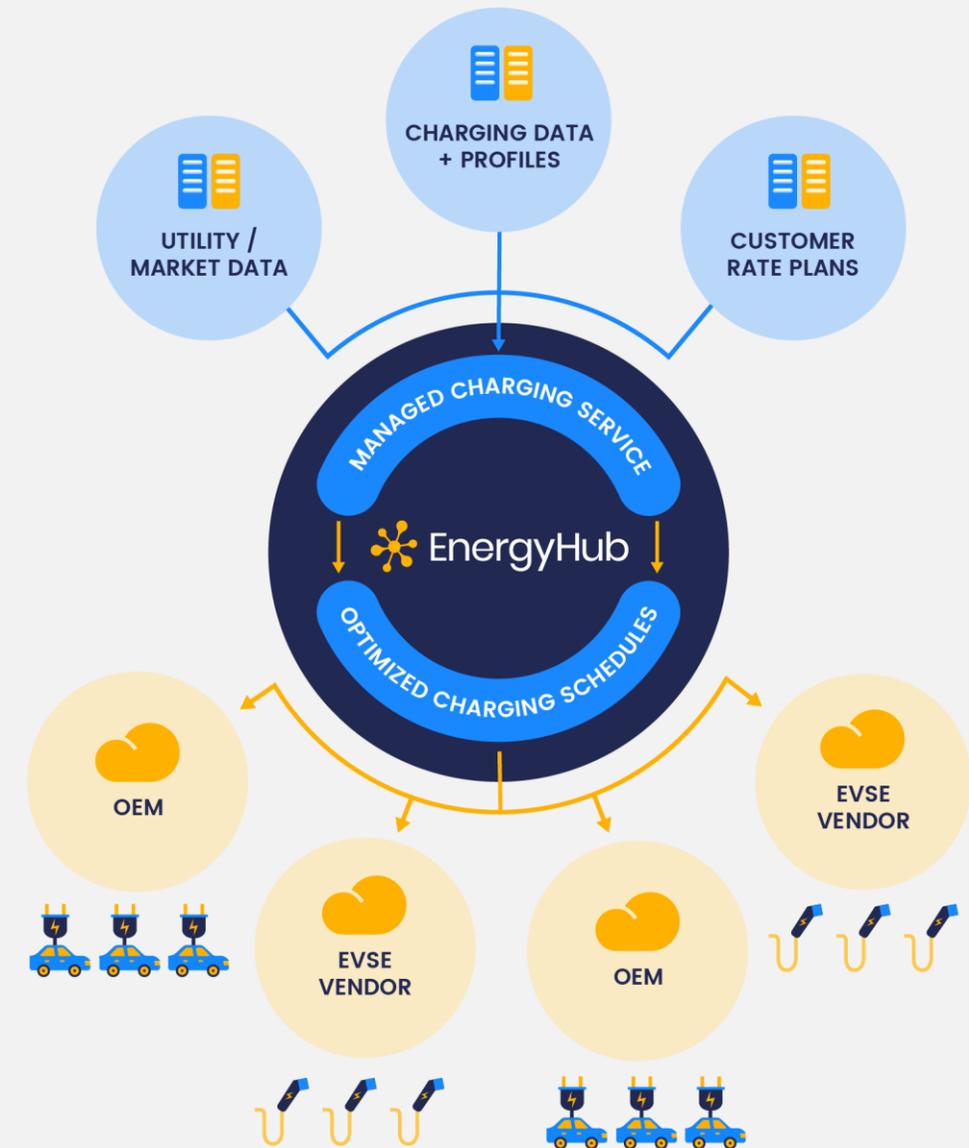
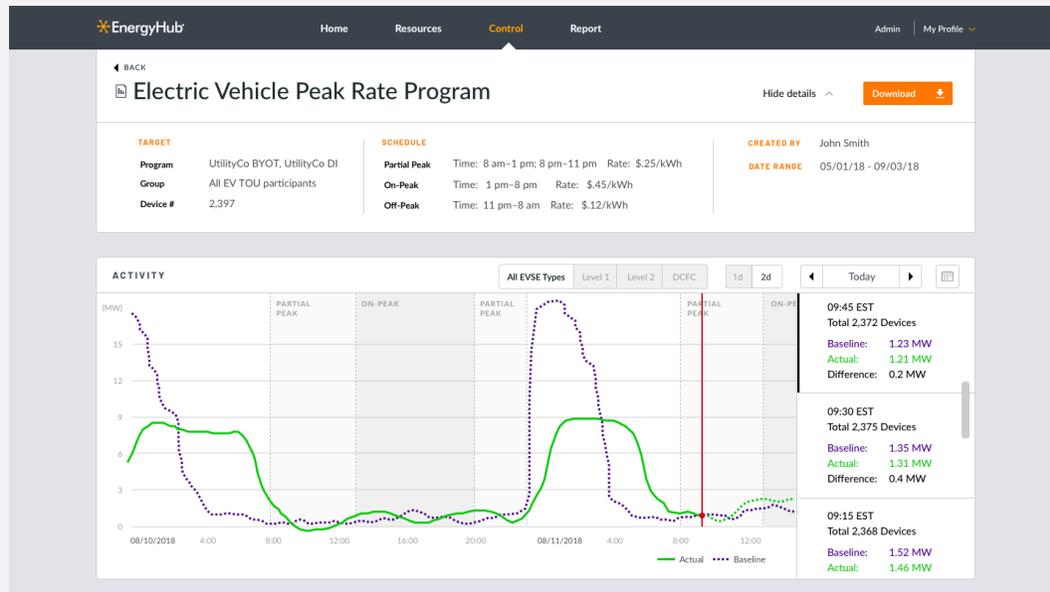
Avg charge duration  **1.9 hours**

Avg plug-in duration  **10.2 hours**

Managed charging



Managed charging



The Missing Piece on Meeting
Transportation Electrification Goals:
Utility Education and Outreach
Programs

June 10, 2021

Katherine Stainken, Policy Director

Plug In

America®

WE DRIVE ELECTRIC. YOU CAN TOO.

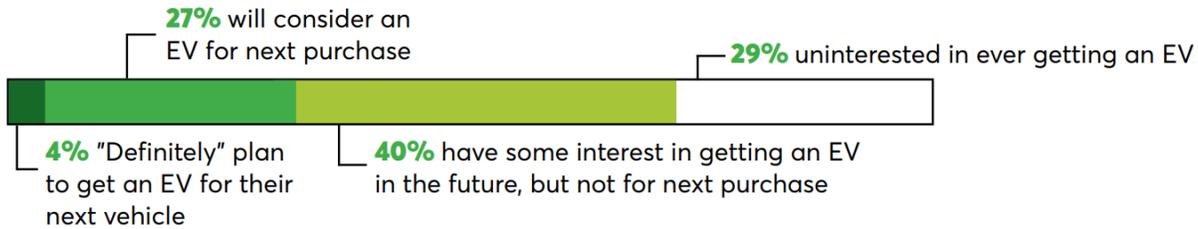
- **The voice of the EV consumer** – nationwide
- 501c3 nonprofit founded in 2008
- Our members represent the world's deepest pool of experienced EV drivers
- Two core areas:
 1. Policy and Advocacy
 2. Education and Outreach
 - PlugStar: dealers, consumers, utilities
 - National Drive Electric Week and Drive Electric Earth Day



- Consumers lack education and awareness of:
 - EVs as a purchase option (pick-ups, SUVs)
 - How, when and where to charge
 - How much charging costs
 - Questions around the battery and maintenance
 - ...and more.



The data proves it!



Consumer Reports (Dec. 2020) report

- 30% of respondents “don’t know enough about EVs to buy one”
- 40% of respondents “have some interest in getting an EV in the future, but not for next purchase”

Of the following attributes, which, if any, are holding you back from purchasing or leasing a plug-in electric vehicle for your next vehicle?

Select up to three. We are interested in knowing your thoughts in general, even if you are not currently in the market to buy or lease a vehicle of any type.

	Total
	%
Not enough public charging stations	48
Purchase price	43
Insufficient driving range (number of miles vehicles can be driven on a full charge)	42
I don't know enough about electric vehicles to buy one	30
Nowhere to charge it at home	28
Long charging times	21
Lack of options among plug-in electric vehicle models currently on the market	14
Higher state registration fees for plug-in electric vehicles	9
Difficult to use technology	2
Other, please specify:	6
Nothing; I am open to and comfortable with the idea of purchasing or leasing a plug-in electric vehicle	4
Base: Respondents with a valid driver's license who do not "definitely" plan to get a plug-in electric vehicle for their next vehicle.	3,252

The data proves it!

- 22% of Americans believe charging EV batteries is extremely difficult, 24% believe it is very difficult, and 32% perceive it to be moderately difficult. Plus, **78% of Americans think finding an EV charging station is at least moderately difficult.** (October 2020 Resources for the Future)
- A recent survey of 1,400 consumers in Pacific Power's territory revealed that well over half of respondents (64 percent) were not aware of any EV initiatives, **70% were unaware of the federal tax incentive for EVs, and 77% were unaware of the Oregon vehicle rebate.** (Pacific Power, OR TE Plan, Feb. 2020)
- More than **three-quarters (78 percent) of respondents were unaware if their state currently offers any rebates or incentives for purchasing or leasing an EV.** (UCS and CR 2019)

- **Automaker E&O:** educate on particular car features, but not necessarily on the charging aspect and what the customer will need to do for access to charging, or the charging rates.
- **National E&O:** Electrify America \$25M out of \$300M each cycle
- **State E&O:** Veloz, Maryland EV (MDEV) (MDOT, MDE, MEA, BEVI)
- **City/Local E&O:** City of Columbus, Denver, few others
- **Regional E&O:** NESCAUM “Drive Change, Drive Electric”
- **Utility E&O:** less than 2% of the total \$1.18 billion in approved TE investment overall; E&O programs are included in about half of the total approved programs



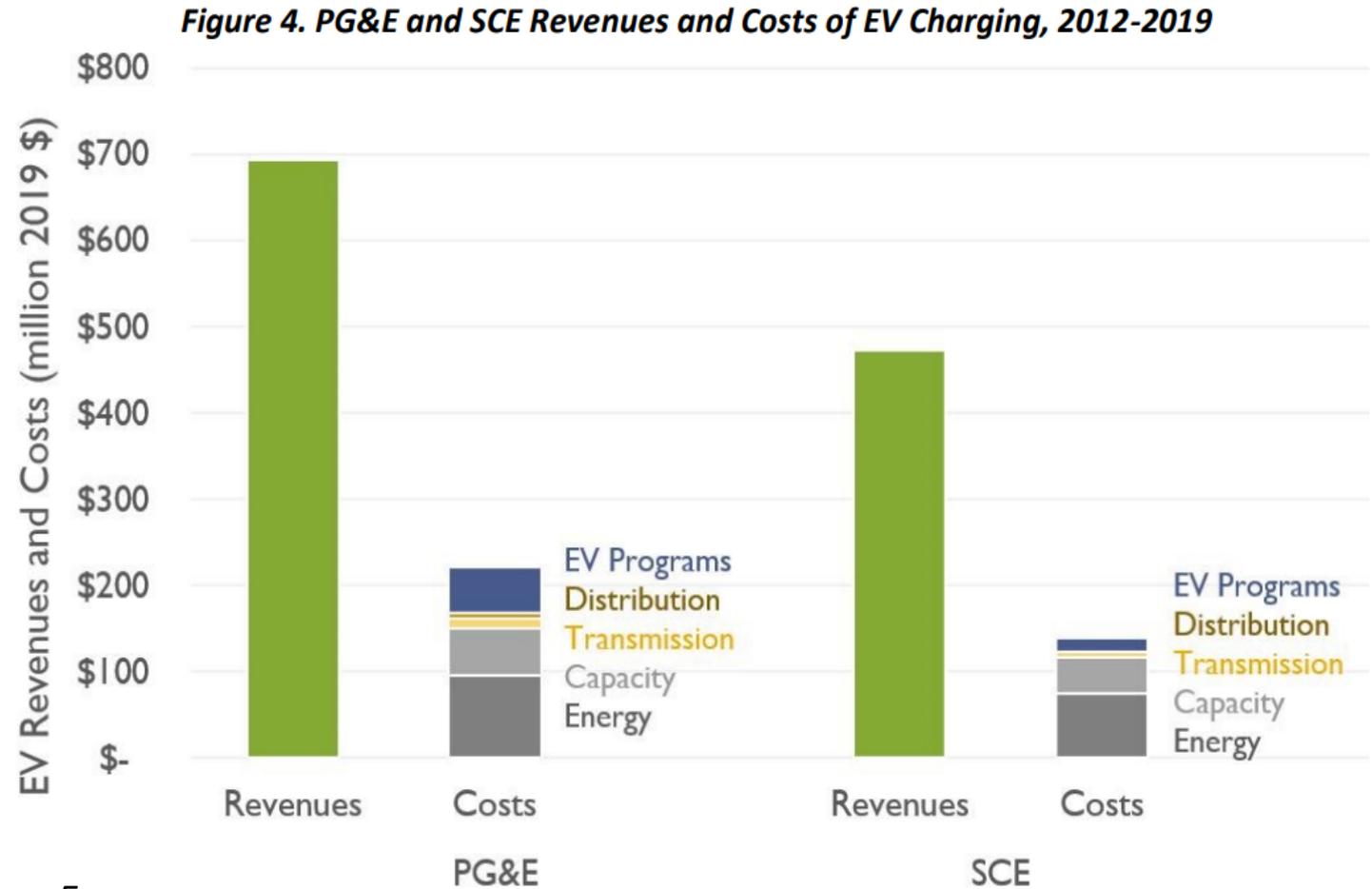
Utilities are a natural fit to help grow consumer awareness of EVs, to the benefit of all electric customers.

Electric utility investment in E&O...

1. Can help accelerate TE, to the benefit of all customers.
2. Can help accelerate TE, to the benefit of the grid.
3. Precedent for electric utility investment in E&O for EVs has been established by E&O investment in EE technologies.
4. Customers view their electric utility as a trusted resource for information and expect electric companies to provide information about EVs.
5. Can complement other E&O efforts, but at the appropriate scale needed.
6. Regulators are establishing precedent for approving electric company investment in E&O for EVs.
7. Can influence both general awareness of EVs and increase program enrollment.
8. Can target specific gaps in the marketplace.

1. Electric utility investment in E&O can help accelerate TE, to the benefit of all customers

- EVs generate more revenue than their cost to serve, which puts downward pressure on customer rates.



Credit: Synapse-Energy

- E&O is needed to establish the relationship between customer and utility for charging, especially so the customer can understand the benefits of managed charging and charging at off-peak times or on TOU rates.
 - Avista’s final report on their EVSE pilot revealed the following, “Customers choosing the EVSE-only TOU rate consumed **93.7%** of charging kWh during off-peak hours... This appears to be most likely due to individual education about the TOU rate and its benefits with participants, demonstrating the potential results of effective customer outreach and education.”
- Utilities alone can capture the system wide benefits of EVs across all use cases, such as individuals, fleets, and the different charging modes (L1, L2, DCFC).
 - Pilot between PG&E and BMW EVs on vehicle grid integration for Day Ahead and Real Time Energy Markets.
 - Electric school bus programs

3. Precedent for electric utility investment in E&O for EVs has been established by E&O investment in EE technologies.

- Regulators have a history of approving electric utility investment in E&O to advance customer solutions that are widely beneficial.
- Nearly all electric utilities have robust EE programs, including significant investment in E&O of EE technologies.
 - LBNL Report: “Electric companies ...are the largest providers of EE programs in the United States, with program-related expenditures of \$6.5 billion, comprising 90 percent of the \$7.2 billion in EE expenditures nationwide.”

Living Room Energy Tips

6. Avoid Vampire Power
The average home has 40 vampire appliances and can cost you an extra \$100 a year. Dracula isn't the only monster that sucks. Use power strips to turn off appliances that could be draining power.

7. Install LED Lights in Common Rooms
Changing to ENERGY STAR® lighting in your five most frequently used fixtures can save up to \$45 a year on energy costs. LED lights use 20-25% of the energy as incandescent light bulbs.

8. Turn the Thermostat Down
You can save up to 10% a year on energy costs by setting your thermostat 7-10 degrees lower than normal. Keep your thermostat consistent at 68 degrees in cool months or 78 degrees in warmer months for optimal energy-efficiency.

9. Consider Energy-Efficient Appliances
In the market for a new TV or sound system? Make your viewing experience even more vivid with Energy Star® approved appliances. ENERGY STAR® appliances have the blue logo.

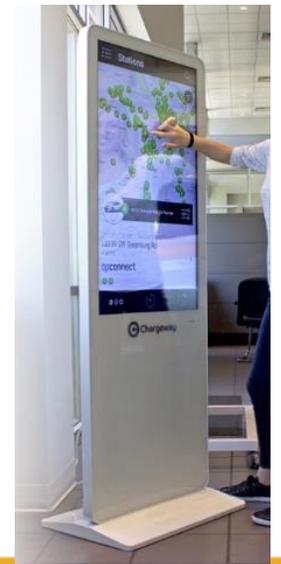
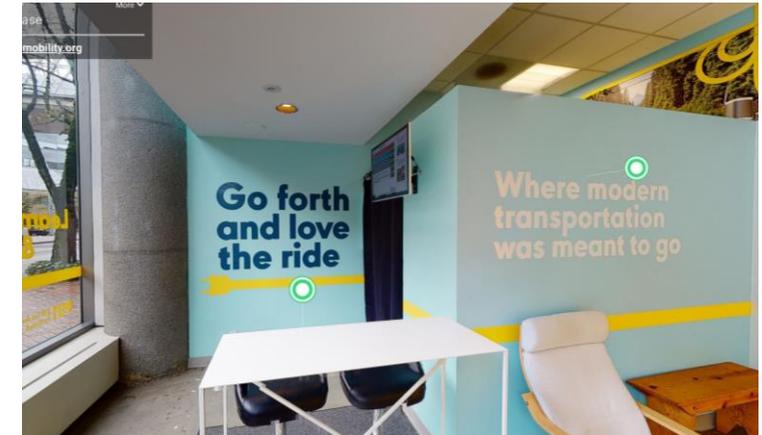
SOURCES
<https://www.energy.gov/eere/energy-efficiency/decoding-some-energy-saving-tips>
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SOURCES: CALIFORNIA EDISON
Energy for What's Ahead®

- Rural and Disadvantaged Communities: utilities have unique access to these customers.
- Second-hand EV Market: utilities are best suited to get the customer on the right charging rate and to help them understand charging times.
 - Many moderate and low-income drivers make up this segment of drivers, who may also need assistance with their charging rate through disadvantaged customer assistance programs.
- Complement city, state, regional efforts.
- Complement utility EE programs.



- **Test Ride & Drives**
 - Ride and drive events significantly increase interest, increase sales and expose customers to the technology.
 - NREL data: After a ride and drive, 67% of follow-up survey respondents did additional research after a ride and drive, and 25% purchased an EV. Furthermore, 98% would buy another EV and 99% would tell their friends to buy an EV too.
- **Retail Experience Centers**
- **Dealer Partnerships**
 - The PlugStar program has been utilized by SCE, SMUD, SDG&E, Ameren and NJ utilities; dealers trained through the program are 4x more likely to sell an EV. Some of the dealerships also host the Chargeway Beacons.
- **Automaker Partnerships**
- **Innovative Partnerships**
 - Georgia Power partnered with Lyft: the program allowed for qualified EV drivers to receive a \$500 bonus when they signed up to drive for Lyft



Thank you!

www.pluginamerica.org

New Email:

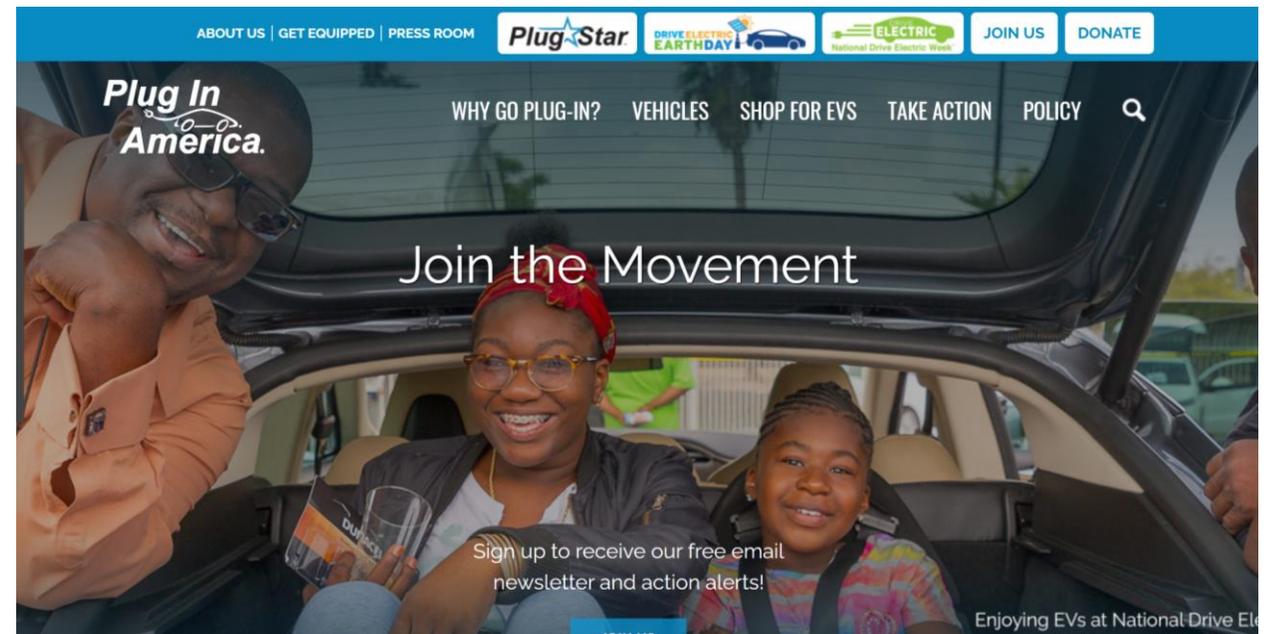
kstainken@electrificationcoalition.org

Sr. Director, EV Policy

PIA Contact:

Joel Levin, jlevin@pluginamerica.org

Executive Director



Current Maryland Utilities Residential offerings

Utility	Rebate Program	Other	Time-of-use (TOU) Rate	Education and Outreach
 <p>An Exelon Company</p>	1,000 \$300 rebates for eligible chargers <i>(1097 customer to date)</i>	N/a	Provide an EV Only TOU rate to residential customer <i>(350 customers to date)</i> Continue to offer EV Whole house TOU rate that was approved prior to EV programs <i>(275 customers to date)</i>	\$1.1M for all programs in the Pilot
 <p>An Exelon Company</p>	1,000 rebates of \$300 for customers for eligible chargers <i>(328 customers to date)</i>	Discounted EV charger and installation for 137 residential applicants <i>(0 customers to date) Delayed due to COVID-19</i> <u>New</u> Off-Peak Off-Bill Rebate Program – Available to 250 Pepco and 75 DPL rebate recipients. Customers receive a \$0.03/kWh incentive for net off-peak charging, quarterly payments via no-fee gift cards	Continue to offer EV rates that were approved prior to EV Programs <i>(Whole House TOU: Pepco – 314 & DPL – 5</i> <i>(Second meter EV Only TOU: Pepco– 91 & DPL– 0)</i>	Pepco: \$700K DPL: \$275K for all programs in the Pilot
 <p>A FirstEnergy Company</p>	1,000 \$300 rebates for eligible chargers <i>(89 customer to date)</i>	Provide an Off-Peak Reward program for residential customers <i>(114 customer to date)</i>	N/a	\$300K for all programs in the Pilot

Note: SMECO does not have residential programs

What are other utilities doing?

Utility (State)	Program(s)	Summary	Results/Findings
DTE Energy (MI)	Charging Forward Also pilots: Smart Charge rewards program and BYOC	\$500 rebate for qualified L2 charger installation and enrollment in year-round TOU rate; includes education and outreach	Received 195 applications and processed 163 of them (as of April 2020)
Xcel Energy (MN)	<ul style="list-style-type: none"> Residential EV Service Pilot Program Residential EV Subscription Service Pilot 	<ul style="list-style-type: none"> Utility will install and pay upfront costs of EVSE Structured as a monthly subscription fee, customers can choose to pay monthly or more up front Pre-qualified equipment, utility-vetted installer network. Education campaign to provide information about the benefits of EV ownership and company offerings 	Original pilot expanded into offering; over 90% of all EV charging activity occurred during off-peak hours
ConEd (NY)	SmartCharge New York Rewards	<ul style="list-style-type: none"> \$150 enrollment incentive (must install and activate device) Customers earn rewards for off-peak charging within the territory Monthly rewards paid via PayPal Range of EVs supported, including Tesla models Also provides customer with insights about vehicle/charging use 	As of December 2020, 2342 light-duty vehicle owners enrolled. Between January 1-October 30, 2020, enrolled EV owners earned a total of \$631,000.
Tucson Electric Power (AZ)	Residential Rebate + TOU	<ul style="list-style-type: none"> Rebate of up to \$500 (smart) or \$250 (non-smart) L2 charger, issued as a bill credit Customer must agree to participate in a TOU plan for at least 2 years 	<i>None available</i>



An Exelon Company



Challenges with EV adoption

- Cost and availability of vehicle options
- Educating customers to adopt EVs
- Engaging low-income customers
- Engaging customers to participate in grid management programs such as EV TOU and managed charging
 - PHI encountering issues with installing a separate meter
- Educating customers to charge off-peak
 - i.e. Scheduling their charger



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Proposed Residential program enhancements

1. Increase customer education, marketing and outreach to 10% of program budget
 - *Engage different customers beyond just the early adopters of EVs*
 - *Educate customers on charging behavior*
2. BGE/PE - Revise rebate structure to \$150 upfront rebate and ongoing \$50 annual credits for keeping charger/vehicle enrolled in EV TOU (where eligible – e.g., BGE) or otherwise connected for utility/PSC data purposes
 - *This structure applies to chargers and EV telematics*
 - *Reduce load impacts*
 - *Incentivizes valuable customer charging behaviors*
 - *Possible increased admin costs*
3. BGE - Approve additional residential rebates
 - *2500 additional rebates for BGE*
 - *Provides access to critical charging data*
 - *Ensures customers participate in EV TOU rates and in future managed charging programs*

Discussion notes:

- Customers that have solar are excluded from EV TOU
- LMI have issue getting residential charger installed. Older homes need a service panel upgrade which is expensive. LMI get additional rebate for service panel upgrade. 50% of the households in MD are LMI
- Important to increase E&O budget
- Challenge to scale to include EJ communities
- BGE's rideshare pilot to address EJ communities
- ChargePoint supports additional rebates. COVID increased residential charger sales. Average rebate is \$500. \$500 programs are most successful.
- What is the cost to implement the \$150 and ongoing?
- Residential program should be significantly expanded. Cost is low and benefits are great
- \$150 is too low. Compared to other programs across the country
- Balancing act with not having too high of rebate while engaging customers
- Does the charger rebate encourage EV adoption?
- Emphasis should be on education. Support non-profits that are doing this type of work
- Bill impacts to non-participants
- Social equity angle – scaling the rebate up to LMI customers
- Gasoline represents 20% LMI budget. Changing to electric changes “fuel” to 5% of budget



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Proposed Residential program enhancements

4. PHI – Revise Residential Plug-in Vehicle TOU (PIV) rebate program to permit utilization of embedded metrology data from EVs and EVSEs
 - *Reduces barriers to EV adoption by eliminating the need for a second meter*
 - *Provides additional charging usage insights to aid in future load management*
5. Potomac Edison is required to implement an EV-Only EV TOU rate and is researching costs to submit to Commission in mid-course review filing

Discussion notes:



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Residential Program Session

■ Topics

- Rebates (chargers and telematics)
- EV TOU rates
- Customer Education and Outreach

■ Presenters

- Utilities
- WeaveGrid

■ Discussion points

- What other topics should be included?
- Who should present?
- What has worked for residential customers?
- What hasn't worked for residential customers?

Suggestions from Stakeholders:

- Weave elements for underserved communities and environmental justice (EJ) communities into the residential program. Define EJ community
- Track EJ communities' progress
- Compare Maryland to other utility programs
- Consider federal incentives
- Provide customer testimonials
- Vehicle vs. Charger - incorporate information on vehicle telematics
- How can DERMs providers manage load



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