



Alliance for
Transportation
Electrification

October 6, 2021

Andrew Johnston
Executive Secretary
Maryland Public Utilities Commission
6 Saint Paul St., 16th Floor
Baltimore, Maryland 21202

Subject: Case No. 9478, BGE Semi-Annual Progress Report and Mid-Course EV
Program Evaluation Report Filings

Dear Mr. Johnston:

Enclosed for filing in the above-referenced matter please find written
comments of the Alliance for Transportation Electrification.

Respectfully submitted,

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Enclosure

In the Matter of the Petition of the Electric
Vehicle Work Group for Implementation of a
Statewide Electric Vehicle Portfolio

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Case No. 9478

**COMMENTS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION
IN SUPPORT OF THE ELECTRIC VEHICLE CHARGING PROGRAM SEMI-ANNUAL
PROGRESS REPORT AND MID-COURSE PROGRAM EVALUATION REPORT OF
BALTIMORE GAS AND ELECTRIC COMPANY**

The Alliance for Transportation Electrification is pleased to submit the following comments supporting the above-captioned compliance filing made in furtherance of advancing the important state goals relating to transportation electrification in Maryland. We believe the recommendations that BGE proposes are consistent with the Commission's directives in Order No. 88997; to the extent changes are proposed, we believe these to be reasonable and we urge the Commission to approve. We have participated in most of the excellent stakeholder process organized by the Commission staff, and assisted by BGE and other utilities. Accordingly, we wish to emphasize the following points:

Additional residential rebates should be approved.

BGE reports that it has issued all 1,000 residential EV charger rebates and currently has a waitlist. As the Company explains in its report, the residential rebate is intended to incentivize EV owners to purchase a smart EV charger over a non-networked charger for customers to take advantage of available EV-Only TOU rates and future potential managed charging programs to reduce system load impacts. We agree with BGE that, given the current uptick in EV model availability and sales, it is important for BGE to engage customers to purchase smart EV chargers so that BGE can monitor charging patterns.

The residential rebate structure should be revised to include a \$50 annual credit.

The purpose of the initial \$300 incentive was to provide a consistent flow of reliable energy usage data over a period of several years. And the challenges associated with receiving customer data over time are well-known. Therefore, to the extent an annual \$50 annual incentive will protect BGE's initial investment, we believe this to be a prudent use of resources and it should be approved.

Enhanced rebates for Limited Income customers should be approved.

As part of the extremely productive stakeholder meetings held by the EV Working Group, several stakeholders expressed the need to provide enhanced incentives to Limited Income customers. Commissions across the country are recognizing the need to offer higher incentives so that customers who earn lower incomes or other otherwise overburdened can benefit from transportation electrification. Given the high up-front cost of installing EVSE, which in many cases will still exceed the proposed higher payment, we believe that BGE's proposal to offer an additional \$1,000 to qualifying customers will be an effective way to broaden the benefits of electric vehicles. Providing sufficient benefits of electric vehicles and charging infrastructure for underserved and LMI communities is critical to meet the obligations of both universal service and beneficial electrification. These proposals are consistent with the best practices for enhanced rebates for EVSE and make-ready infrastructure by leading utilities in the country, such as Xcel Energy, Portland General, Southern California Edison, DTE Energy and others. For this reason, we encourage the Commission to approve BGE's request.

BGE should be permitted to install and operate EVSE at multifamily properties.

EV charging in multifamily communities has long been the most challenging of all use cases. We could write volumes about the time and effort to overcome obstacles to charging in multifamily communities, but the reasons boil down to three concerns, namely

cost, complexity, and liability. Each of these alone could be a deal-breaker; when taken together they constitute a near total bar to success, as evidenced by the low uptake that BGE reports.

BGE's proposal to invest \$2.5 million in additional funding for an additional 100 L2 EV chargers to be installed and operated by BGE on multifamily properties is a reasonable approach that is expected to alleviate many of the typical landlord concerns. BGE has developed over many years a trusted energy advisor relationships with its customers which allows it to be uniquely positioned to address the myriad intricacies and complexities of multifamily charging. The need for this proposal is self-evident by the low uptake, and we recommend that the Commission grant BGE's request.

Multifamily rebates should be expanded to include new, privately-developed, non-utility public DCFC charging sites located within one mile of at least 100 multifamily residential units.

BGE seeks to encourage charging networks to construct and operate DC fast chargers at locations that will provide convenient, fast, and accessible EV charging for multifamily residents in the neighborhoods in which they live, where multifamily property owners/managers are not able or otherwise are not motivated to offer EV charging onsite. While the proposed utility ownership program element is one approach to solving the challenge of charging at multifamily communities, there is no "one-size-fits-all" solution. BGE's proposal to provide incentives to DC fast charging within limited parameters is a creative solution and we encourage the Commission to approve it.

The proposed discounted charging rate for multifamily customers should be approved.

EV charging today requires an "all of the above" approach. We are engaged in regulatory proceedings such as this across the country, and it is always refreshing to see new ideas. BGE's proposal to offer discounted charging at DC fast chargers to residents of

multifamily communities is one such new idea. It has the potential to be cost effective by avoiding the expense of EVSE in commercial settings, and given electric vehicles' increasing ranges and speeds of charging, charging at DC fast chargers exclusively has the potential to be a viable solution for at least some drivers. While it is difficult to provide complete parity to different types of customers (based on rate classes) due to the nascent market development and lack of adequate cost data to support cost-of-service studies, we believe this proposed discount is a reasonable approach. As with utilities in other jurisdictions in the country in their TE Plans, creative ideas like this are being discussed and adopted to try to narrow these gaps. Therefore, we urge the Commission to give this positive consideration and approve it.

BGE's car share program should be approved.

BGE is requesting approval to spend \$1.2 million in order to provide one EV and one Level 2 charger at 15 distinct multifamily properties serving LMI customers within BGE's service territory. As referenced above, utilities and regulators across the country are struggling with measures that will include customers who otherwise lack the resources to benefit from transportation electrification. Given the exposure that the proposed program will deliver, and the benefit that will be shared by numerous customers who otherwise will not have an opportunity to participate directly in the EV program, we believe that this is another innovative and appropriately-sized proposal. The purpose of this entire program is to test a number of measures; the ride-share program element will be easily measured so that the Commission can decide whether to expand or discontinue the program in the future, and for these reasons we support BGE's proposal.

DC Fast Charging

BGE is requesting approval to spend \$5 million increase to purchase and install higher-powered DCFC chargers versus lower-powered L2 chargers. Based on advances in the industry, we completely agree with BGE on the need for higher-powered DCFC chargers. Such chargers provide better overall economics through higher utilization, and they also provide a customer experience that is far superior. For these reasons we support BGE's request.

Fleet services are needed and should be approved.

Although BGE's initial filing on the subject of EV charging occurred not long ago, a lot has been happening in the EV space. For one, customer interest in electrifying their fleets has developed from essentially nothing a few years ago to now being the main topic of conversation. And similar to other areas of EV charging, it is complicated. For that reason, and as discussed in the EV Workgroup, BGE now proposes the following, which we support for the reasons listed below:

- 1) A web-based Fleet Calculator Tool on the BGE website for fleets exploring fleet electrification. This tool will provide potential EV customers with useful and actionable information that is sorely needed in this time of great transition. While the private sector certainly supplements BGE's proposed efforts, the state's utilities offer the type of insight and trusted advisor that will provide valuable benefits. Moreover, this service will enable BGE to learn more about fleet electrification plans in its service territory and potential impacts on the grid. Lead time is an under-appreciated factor in fleet applications and having BGE involved at the very earliest stages increase the likelihood of a positive experience.

- 2) 100 Fleet Electrification Assessments to support fleets through an advisory service from beginning to end of the electrification journey. As a next step from the calculator tool described above, fleet assessments can help fleet managers understand how to optimize their EV charging based on electricity rates at their site, select the best charging solutions for the fleet, and learn about rebates and incentives available to offset the cost of vehicles, infrastructure, and make ready work. As described previously, transitioning commercial vehicles from combustion engines to electric drivetrains is an exceedingly complex undertaking. Utilities engagement at the earliest stages will be invaluable to success. As an organization that is actively engaged in proceedings such as this around the country, we can also attest to the fact that the market responds to governmental and utility support and BGE's proposal will serve as a catalyst to change here in Maryland.
- 3) Rebates to lower the upfront costs of electrification, which continues to be a major barrier for many fleets. It is a truism that markets respond to incentives. That is why California is experiencing such success with electric vehicles of all types. Customers have choices, and Maryland competes with other states for private investment dollars in transportation electrification. To the extent the proposed rebates can be leveraged to offer customers a better return on their investment, Maryland stands to benefit. If customers find better deals elsewhere, that is where they will go. For this reason, we support BGE's request and urge Commission approval.
- 4) The creation of an EV Fleet Working Group subgroup to continue discussions and discuss, strategize, and develop future EV Fleet offerings such as managed charging and rate tools. Through our engagement in the Commission's EV workgroup over the past several years, it is our view that your stakeholder process is among the best in the nation. We regularly refer other states to you for guidance on how they should structure

their programs. An EV Fleet Working Group is a logical outcome of the existing successful stakeholder process and we fully support its establishment.

Education and Outreach investment should be increased

Despite the Commission's familiarity with electric vehicles, it is important to remember that EVs are still new to most customers. Developing a relationship with customers so utilities can teach customers about the benefits of managed charging and charging at off-peak times or on TOU rates has value. The initial program budget was requested to be a percentage of the total program size; when the program size was reduced, so too was the E&O budget. Unfortunately, the E&O efforts are not scalable and the original dollar amount is what is needed. For this reason, we support BGE's request for a larger E&O budget.

COMAR waivers should continue

In Order No. 88997, the Commission granted requested waivers for certain submetering provisions in order to facilitate the deployment of EV charging equipment by the utility companies. The waivers allowed the utilities to utilize EV charging technology to its maximum potential, including developing and implementing time-variant rates, pursuing load management opportunities, and gathering important data regarding charging habits, all without the need for and associated costs of additional equipment. We strongly supported these waivers and continue to do so. Any hesitation should be tempered by the fact that any metrology that is subject to waiver is merely for differentiating for EV loads. For total volumetric purposes, all kWh are measured by a standard utility meter. For these reasons, while technology continues to evolve, and with the knowledge that the utility meter is measuring the total energy consumption, we support continuation of the COMAR waivers.

Conclusion

In conclusion, and as discussed herein, we urge the Commission to approve BGE's requests.

Respectfully submitted,

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