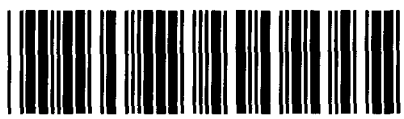
Control Number: 49125



Item Number: 22

Addendum StartPage: 0

PROJECT NO. 49125

REVIEW OF ISSUES RELATING TO ELECTRIC VEHICLES	§ §	**PUBLIC UTILITY COMMISSION OF TEXAS**

COMMENTS OF EL PASO ELECTRIC COMPANY ON QUESTIONS REGARDING PROJECT NO. 49125

On December 13, 2019, the staff of the Public Utility Commission of Texas (the "Commission") ("Staff") requested comments on questions regarding Project No. 49125, *Review of Issues Relating to Electric Vehicles*. El Paso Electric Company (EPE) offers the following comments for the Commission's consideration.

General Data

1. The Commission requests that parties provide current data sources and projections for the expected deployment of electric vehicles in Texas over the next ten years. If available, the data sources should attribute the projections by vehicle class (i.e., personal, commercial short-haul including fleets and buses, and commercial long -haul electric vehicles).

Response:

Electric vehicle forecasts have been produced for light-duty vehicles (personal) within EPE's Texas service territory and are included in Attachment 1. Commercial long-haul electric vehicles forecasts are under development.

2. Please provide any current data sources and information on the expected amount of new load attributable to electric vehicles over the next ten years. If available, the data sources should attribute this load by vehicle class (i.e., personal, commercial short-haul including fleets and buses, and commercial long-haul electric vehicles).

Response:

Increase of demand and energy usage due to light-duty electric vehicles have been estimated based on a common 7.2 kW Level-2 charger and with consideration of national average commute data. The forecasted data is included in Attachment 2. Please note that the forecasted demand is Maximum Non-Coincident Peak Demand and not the expected demand at the time of system peak, i.e., all vehicles charging at the same time.

3. Please identify any anticipated load "hot spots" in the state for electric vehicle charging. Please specify whether these hot spots are expected to result from personal, commercial short-haul, or commercial long-haul electric vehicle deployment and charging.

Response:

Please see Attachment 3 for the graph showing current public hotspots (2 or more charging stations near each other) in EPE's Texas service territory. The El Paso region could be a larger potential load "hot spot" once long-haul electric vehicles adoption becomes widespread. This is due to the region being an important border crossing for local and national long-haul cargo trucks. In addition to Attachment 3, EPE has included Attachment 4, which lists the address and other information for each of the 37 charging stations in EPE's Texas service territory.

4. Describe the observed or anticipated load profiles and impacts of various types of electric vehicle charging stations (e.g., residential Level 1, Level 2, and Level 3 DC Fast charging) and the class of the vehicle charging (i.e., personal, commercial short-haul including fleets and buses, and commercial long-haul electric vehicles).

Response:

Although there are metered residential and public charging stations in EPE's service territory, there is limited data to produce accurate representations of the load profiles. EPE has just recently placed Interval Demand Recorder meters on a few charging stations in its Texas service territory, fall 2019.

5. What, if any, emerging vehicle charging technologies are anticipated to be commercially available in the next ten years that could impact electricity markets in Texas?

Response:

DC fast charging for commercial trucking and buses could potentially see an increase in deployment in EPE's service territory. El Paso is a major border town and transportation and warehousing hub both internationally and along the I-10 corridor. Commercial charging may see demand levels of 1MWac per charging port and distributed battery storage could reduce demand and grid impacts (*SEPA, "Preparing for an Electric Vehicle Future: How Utilities Can Succeed", October 2019).* Vehicle to grid applications may become technically viable outside of pilot and demonstration projects as advanced batteries

come on the market that can tolerate a high number of charge/discharge cycles with minimal impact on battery life (*SEPA, "Utilities and Electric Vehicles, The Case for Managed Charging, April 2017).* Vehicle to grid maturity could make distributed storage resources available to provide grid services.

Grid Impacts

6. The Commission requests that parties provide a detailed explanation on the following items:

   a. The anticipated impacts of electric vehicle charging, including residential and commercial charging stations on the distribution system in the next ten years;

Response:

There are many factors that, over the course of then next ten years, will define the overall impact of EV charging on the utility's electric distribution system. From a cost perspective the utility will want to mitigate as much as possible any required rebuilding or upgrading of the existing distribution system to accommodate the increased EV charging load. The best way to accomplish that objective will be to incentivize EV charging to the off-peak hours by way of time-of-use (TOU) metering and motivational time-of-use rates. The use of off-peak charging incentives will help the utility absorb the majority of the new EV load by increasing the distribution system load factor (smoothing out the residential load curve) and minimize the expense of system upgrades.

From EPE's perspective, we can reasonably expect the adoption (or penetration) of EVs and EV charging will follow a similar demographic and geographical service area pattern as that of residential solar distributed generation. Federal and State tax incentives, in combination with household income, home ownership, and space (roof top, etc.) have all played a deciding role in whether the customer "goes solar." Similarly, the decision to purchase an EV rather than a traditional gas-powered vehicle, will likely be decided by household income, home ownership, and ability to have (or modify the electric service to have) a level 1, level 2, or level 3 charging unit at home. Moreover, owners of established multi-family residential properties and other residential rental properties will be slow to shoulder the expense of modifying the electric service to accommodate tenant EVs for level 2 or level 3 charging units. On the other hand, new residential subdivisions will, and in a growing number of cases already do, plan for both solar distributed generation and level 2 or level 3 EV

charging units in their residential electrical design. Therefore, the newly expanded distribution infrastructure build-out will accommodate the increased load of EV charging.

Regarding to publicly available (Walmart, hotel/motel, etc.) and commercial fleet (FedEx, UPS, USPS, etc.) EV charging, both dominantly level 2 (240 VAC) and level 3 (200-450 VDC) charging stations, there may indeed be a difference in the actual usage profile of these two categories of non-residential EV charging. EPE would expect the publicly available ("public") charging stations to have a higher on-peak, or day-time charging frequency than the commercial fleet charging stations. The impact on the electric distribution system from public EV charging (daytime, on-peak) will be handled at the individual distribution feeder level. It is completely possible that the new public EV charging load is on a distribution feeder that already has a high penetration of solar distributed generation and there is no net increase in load above the normal feeder load capacity over the on-peak hours. Continuing, EPE believes the lower cost incentive of off-peak TOU rates will strongly influence commercial fleet charging and, like residential EV charging, it will be handled by way of an improved distribution system load factor (smoothing of the commercial load profile). In both cases, for public and commercial fleet EV charging, EPE expects the entity that pays the bill to want to be on the EV charging rate and will therefore follow EPE's "new service request" process for a different service and different meter and EPE will have ample opportunity to know of and plan for any new load requirements.

In summary, EPE believes that the majority of EV charging and the increased load impact on the distribution system can be mitigated by way of TOU metering and motivating TOU rates. Certainly, there will be situations where TOU metering and rates do not solve the problem (e.g. public EV charging) and localized improvements will have to be made to the electric distribution system. Going forward, modifications to our design standards will evolve with the new customer load profiles for the new, expanded, distribution infrastructure and it will accommodate any additional EV charging load. We do not expect those situations to be overly problematic system wide.

b. The anticipated impact of electric vehicle charging stations on the transmission system in the next ten years; and

Response:

As shown in Attachment 2, EPE expects 81 MW of increased maximum non-coincident peak load attributed to EV charging over a 10-year projection. This will not manifest itself in one area of EPE's service territory, or on one single distribution substation, therefore, the additional EV load will not be out of the scope of EPE's normal transmission system planning process. Thus, EPE does not expect EV charging to have a significant impact on the transmission system or on EPE's transmission system planning and expansion process.

c. The anticipated impact of electric vehicle charging stations on long-term system planning at the regional transmission organization level, given a widespread adoption scenario.

Response:

Not applicable. EPE is not part of a regional transmission organization.

7. What is the overall anticipated impact of electric vehicle charging in the next ten years in terms of energy and peak demand? What changes, if any, should be made to energy and peak demand forecasts to incorporate this impact?

Response:

Please see Attachment 2 for EPE's projected impact of light-duty electric vehicles on energy and Maximum Non-Coincident Peak demand over the next 10-years. EPE is currently working on finalizing its forecasts for the estimated impact of light-duty electric vehicles on system peak demand. EPE expects that as electric vehicle forecasts are developed and refined, they will be included into the official long-term system planning forecasts of the company.

8. What are the capabilities of electric vehicle related technologies, such as vehicle-to-grid, to participate in wholesale electricity markets?

Response:

Current battery technology (cycle life) limits vehicle to grid applications to pilot projects (*SEPA, "Utilities and Electric Vehicles, The Case for Managed Charging April 2017)*, but smart charging can potentially allow for demand response and peak

shifting by grid operators and shaping of electric vehicle load profiles to potentially minimize grid impacts and costs. Managed charging is primarily accomplished via networked charging equipment using WiFi, Cellular, or advanced metering infrastructure (AMI) based communications. In some cases, managed charging could be possible via the onboard vehicle diagnostics port (OBD-II) or via vehicle manufacturer telematics (*SEPA, "A Comprehensive Guide to Electric Vehicle Managed Charging," May 2019).*

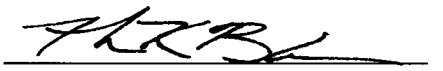
9. Please explain any preferred or best practice facilities siting and design standards for commercial electric vehicle charging stations and why such standards are recommended.

Response:

EPE has installed 16 networked level 2 charging ports for fleet and employee use. The stations were installed at four different facilities including one not owned by EPE. In EPE's experience, a licensed electrician following local regulations and the National Electrical Code (NEC) should be contracted when installing any commercial electric vehicle charging station. An electrical engineer and Professional Engineer stamped designs may be required when designing larger or more complex commercial installations involving multiple stations. Commercial charging stations are increasing in capacity and charging speeds (*SEPA, "Preparing for an Electric Vehicle Future: How Utilities Can Succeed", October 2019)*; design and installation considerations must include the latest industry standards at the time of deployment. Consultation with electric utilities is important as part of electric vehicle charging infrastructure design, as utilities may need to upgrade distribution components to accommodate the new load. Electric vehicle battery size is growing over time and the majority of EV owners charge primarily at home for daily commuting and use DC fast charging on longer trips (*SEPA, "Preparing for an Electric Vehicle Future: How Utilities Can Succeed", October 2019).* Given current trends, siting stations where vehicles will be parked for long periods of times (residence or workplace) and along major travel corridors appears to make the most sense.

Respectfully submitted,

Matthew K. Behrens
State Bar No. 24069356
Attorney
matthew.behrens@epelectric.com
El Paso Electric Company
P.O. Box 982
El Paso, Texas 79960
Telephone: (915) 543-5882
Facsimile: (915) 521-4412



ATTORNEY FOR EL PASO ELECTRIC COMPANY

El Paso Electric Company
Light-Duty Battery Electric Vehicle (BEV) and Plug-in Hybrid EV (PHEV) Analysis for Texas
Forecasted Number of BEV's and PHEV's (2020-2029)

	Cummulative # of BEVs and PHEVs by Month		
Month/ Year	Low	Baseline	High
2019	574	574	574
Jan-20	588	589	591
Feb-20	601	604	607
Mar-20	615	619	624
Apr-20	628	634	640
May-20	642	649	657
Jun-20	655	664	674
Jul-20	669	679	690
Aug-20	682	694	707
Sep-20	696	709	723
Oct-20	709	724	740
Nov-20	723	739	756
Dec-20	736	754	773
Jan-21	754	774	795
Feb-21	771	794	817
Mar-21	788	814	840
Apr-21	806	833	862
May-21	823	853	884
Jun-21	840	873	907
Jul-21	858	893	929
Aug-21	875	912	951
Sep-21	892	932	973
Oct-21	909	952	996
Nov-21	927	971	1,018
Dec-21	944	991	1,040
Jan-22	966	1,017	1,070
Feb-22	989	1,043	1,100
Mar-22	1,011	1,069	1,130
Apr-22	1,033	1,095	1,160
May-22	1,055	1,121	1,190
Jun-22	1,077	1,147	1,220
Jul-22	1,100	1,173	1,250
Aug-22	1,122	1,199	1,280
Sep-22	1,144	1,224	1,310
Oct-22	1,166	1,250	1,340
Nov-22	1,188	1,276	1,370
Dec-22	1,211	1,302	1,400
Jan-23	1,239	1,336	1,441
Feb-23	1,268	1,370	1,481
Mar-23	1,296	1,404	1,521
Apr-23	1,325	1,438	1,562
May-23	1,353	1,472	1,602
Jun-23	1,382	1,507	1,642
Jul-23	1,410	1,541	1,683
Aug-23	1,438	1,575	1,723
Sep-23	1,467	1,609	1,764
Oct-23	1,495	1,643	1,804
Nov-23	1,524	1,677	1,844
Dec-23	1,552	1,711	1,885
Jan-24	1,589	1,756	1,939
Feb-24	1,625	1,800	1,993
Mar-24	1,662	1,845	2,048
Apr-24	1,698	1,890	2,102
May-24	1,735	1,935	2,156
Jun-24	1,771	1,979	2,211
Jul-24	1,808	2,024	2,265

	Cummulative # of BEVs and PHEVs by Year		
Year	Low	Baseline	High
2019	574	574	574
2020	736	754	773
2021	944	991	1,040
2022	1,211	1,302	1,400
2023	1,552	1,711	1,885
2024	1,991	2,248	2,537
2025	2,552	2,953	3,415
2026	3,273	3,880	4,596
2027	4,197	5,098	6,186
2028	5,382	6,697	8,326
2029	6,901	8,799	11,207

	Forecasted BEV and PHEV Growth Rate per Month		
Year	Low	Baseline	High
2020	14	15	17
2021	17	20	22
2022	22	26	30
2023	28	34	40
2024	37	45	54
2025	47	59	73
2026	60	77	98
2027	77	101	133
2028	99	133	178
2029	127	175	240

EIA Projected Electric Vehicle Penetration		
Low	Baseline	High
0.1046538	0.170165106	0.276070949
10%	17%	28%

2019 is Historical data

	Cummulative # of BEVs and PHEVs by Month		
Month/ Year	Low	Baseline	High
Aug-24	1,845	2,069	2,319
Sep-24	1,881	2,114	2,374
Oct-24	1,918	2,158	2,428
Nov-24	1,954	2,203	2,482
Dec-24	1,991	2,248	2,537
Jan-25	2,037	2,307	2,610
Feb-25	2,084	2,365	2,683
Mar-25	2,131	2,424	2,756
Apr-25	2,178	2,483	2,829
May-25	2,225	2,542	2,903
Jun-25	2,272	2,600	2,976
Jul-25	2,318	2,659	3,049
Aug-25	2,365	2,718	3,122
Sep-25	2,412	2,777	3,195
Oct-25	2,459	2,836	3,268
Nov-25	2,506	2,894	3,341
Dec-25	2,552	2,953	3,415
Jan-26	2,613	3,030	3,513
Feb-26	2,673	3,108	3,611
Mar-26	2,733	3,185	3,710
Apr-26	2,793	3,262	3,808
May-26	2,853	3,339	3,907
Jun-26	2,913	3,417	4,005
Jul-26	2,973	3,494	4,104
Aug-26	3,033	3,571	4,202
Sep-26	3,093	3,648	4,301
Oct-26	3,153	3,725	4,399
Nov-26	3,213	3,803	4,497
Dec-26	3,273	3,880	4,596
Jan-27	3,350	3,981	4,728
Feb-27	3,427	4,083	4,861
Mar-27	3,504	4,184	4,993
Apr-27	3,581	4,286	5,126
May-27	3,658	4,387	5,258
Jun-27	3,735	4,489	5,391
Jul-27	3,812	4,590	5,524
Aug-27	3,889	4,692	5,656
Sep-27	3,966	4,793	5,789
Oct-27	4,043	4,895	5,921
Nov-27	4,120	4,996	6,054
Dec-27	4,197	5,098	6,186
Jan-28	4,296	5,231	6,364
Feb-28	4,394	5,364	6,543
Mar-28	4,493	5,497	6,721
Apr-28	4,592	5,631	6,900
May-28	4,690	5,764	7,078
Jun-28	4,789	5,897	7,256
Jul-28	4,888	6,031	7,435
Aug-28	4,987	6,164	7,613
Sep-28	5,085	6,297	7,791
Oct-28	5,184	6,431	7,970
Nov-28	5,283	6,564	8,148
Dec-28	5,382	6,697	8,326
Jan-29	5,508	6,872	8,567
Feb-29	5,635	7,048	8,807
Mar-29	5,761	7,223	9,047
Apr-29	5,888	7,398	9,287

El Paso Electric Company
Light-Duty Battery Electric Vehicle (BEV) and Plug-in Hybrid EV (PHEV) Analysis for Texas
Forecasted Number of BEV's and PHEV's (2020-2029)

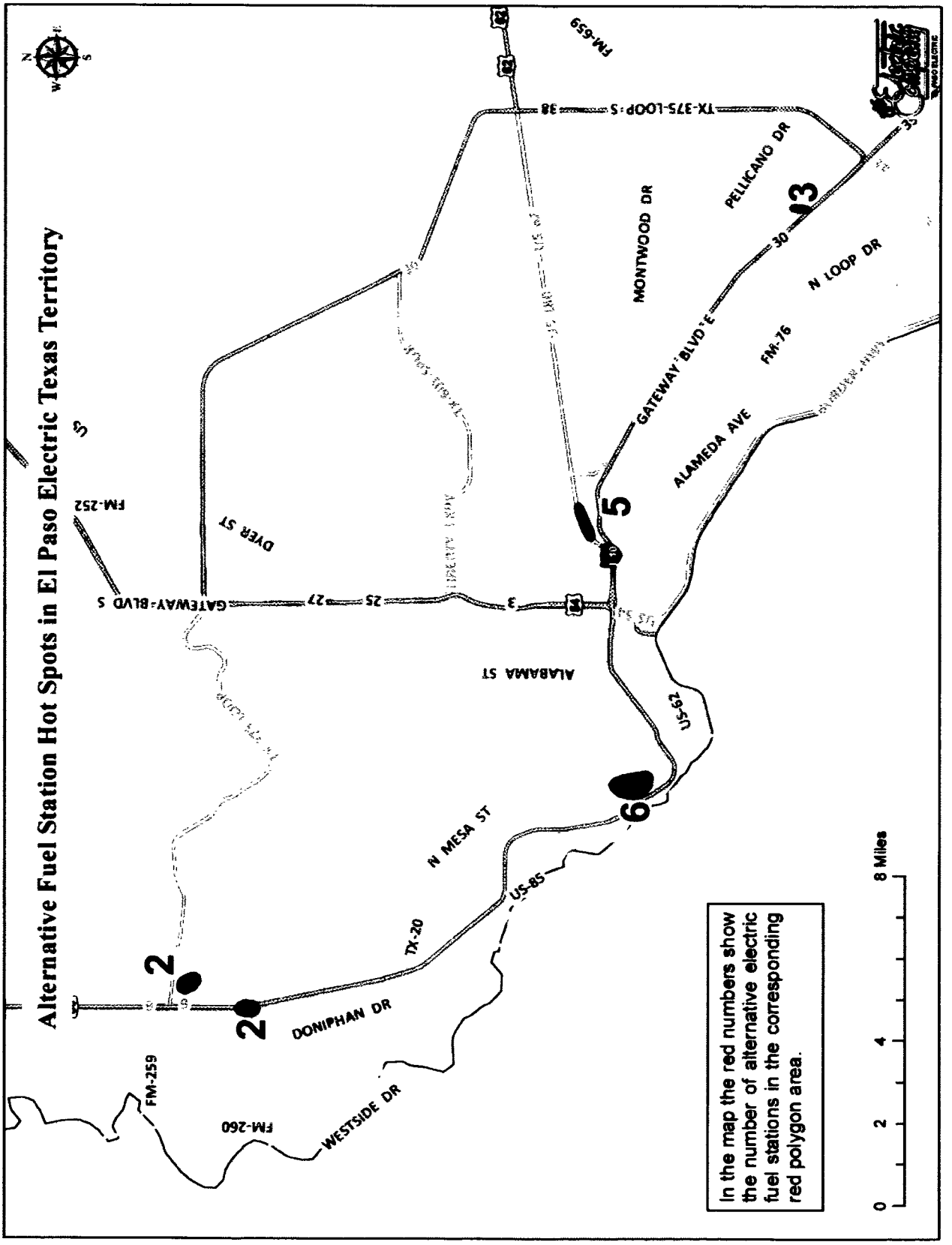
	Cummulative # of BEVs and PHEVs by Month		
Month/ Year	Low	Baseline	High
May-29	6,015	7,573	9,527
Jun-29	6,141	7,748	9,767
Jul-29	6,268	7,923	10,007
Aug-29	6,394	8,098	10,247
Sep-29	6,521	8,274	10,487
Oct-29	6,647	8,449	10,727
Nov-29	6,774	8,624	10,967
Dec-29	6,901	8,799	11,207
Feb-29	4,897	6,277	8,036
Mar-29	5,024	6,455	8,284
Apr-29	5,151	6,632	8,531
May-29	5,278	6,810	8,778
Jun-29	5,405	6,988	9,026
Jul-29	5,531	7,166	9,273
Aug-29	5,658	7,343	9,521
Sep-29	5,785	7,521	9,768
Oct-29	5,912	7,699	10,015
Nov-29	6,038	7,877	10,263
Dec-29	6,165	8,054	10,510

	Forecasted Demand (MW)[1]		
Year	Low	Baseline	High
2020	5	5	6
2021	7	7	7
2022	9	9	10
2023	11	12	14
2024	14	16	18
2025	18	21	25
2026	24	28	33
2027	30	37	45
2028	39	48	60
2029	50	63	81

	Forecasted Energy Usage (MWh)[2]		
Year	Low	Baseline	High
2020	1,434	1,470	1,506
2021	1,839	1,931	2,026
2022	2,358	2,537	2,728
2023	3,024	3,333	3,671
2024	3,878	4,379	4,942
2025	4,972	5,753	6,652
2026	6,376	7,558	8,953
2027	8,176	9,930	12,051
2028	10,484	13,046	16,220
2029	13,443	17,141	21,832

1 - Forecasted Maximum Non-Coincident Peak Demand considering 7.2 kW level-2 charger

2 - Forecasted Energy considering average commute


Alternative Fuel Station Hot Spots in El Paso Electric Texas Territory
2
2
3
5
6
DONIPHAN DR
N MESA ST
TX-20
US-85
US-62
ALABAMA ST
GATEWAY BLVD S
DYER ST
FM-252
GATEWAY BLVD E
ALAMEDA AVE
FM-76
N LOOP DR
MONTWOOD DR
PELLICANO DR
FM-659
TX-375-LOOP-S
FM-259
FM-260
WESTSIDE DR
In the map the red numbers show the number of alternative electric fuel stations in the corresponding red polygon area.
0
2
4
8 Miles

El Paso Electric Company
EV Charging Site Locations

No.	Fuel Type Code	Station Name	Street Address	City	State	ZIP	Charging Level	EV Level1 EVSE Num	EV Level2 EVSE Num	EV DC Fast Count	Average Usage [2]	Peak Demand[2]	Ownership/ Groups With Access Code	Facility Type
1	ELEC	Latuna Federal Correctional Institution	8500 Doniphan Rd	Anthony	TX	79821	Level 2		1				Private	PRISON
2	ELEC	Casa Nissan	5855 Montana Ave	El Paso	TX	79925	Level 2		1				Public - Call ahead	CAR_DEALER
3	ELEC	Mission Chevrolet	1316 George Dieter	El Paso	TX	79936	Level 2		1				Public - Call ahead	CAR_DEALER
4	ELEC	Casa Nissan	5855 Montana Ave	El Paso	TX	79925	Level 2		1				Private	CAR_DEALER
5	ELEC	Viva Nissan	1310 N Zaragoza Rd	El Paso	TX	79936	Level 2		1				Private	CAR_DEALER
6	ELEC	BMW EL PASO	6318 Montana Ave	El Paso	TX	79925	Level 2		2				Public	
7	ELEC	ADP - El Paso	1851 N Resler Dr	El Paso	TX	79912	Level 2		2				Private	OFFICE_BLDG
8	ELEC	ADP - El Paso	7650 San Felipe Dr	El Paso	TX	79912	Level 2		2				Private	OFFICE_BLDG
9	ELEC	Sun Metro Glory Road- 2nd Level	100 E Glory Road	El Paso	TX	79902	Level 2		1				Public	
10	ELEC	El Paso Int'l Airport- Short-Term Parking	6701 Convair Road	El Paso	TX	79925	Level 2		4				Public	
11	ELEC	Sun Metro - Mission Valley Terminal	9065 Alameda Avenue	El Paso	TX	79907	Level 2		2				Public	
12	ELEC	Sun Metro Westside	7535 Remcon Circle	El Paso	TX	79912	Level 2		2				Public	
13	ELEC	The University of Texas at El Paso (UTEP)	500 West University	El Paso	TX	79902	Level 2		3				Public	
14	ELEC	UTEP - Academic Services Building Parking Lot	501 W Schuster Avenue	El Paso	TX	79902	Level 2		1				Public	
15	ELEC	UTEP - Schuster Parking Garage	500 W. Schuster Avenue	El Paso	TX	79902	Level 2		2				Private	
16	ELEC	UTEP - Union Building East Parking Lot	275 W University Avenue	El Paso	TX	79902	Level 2		2				Public	
17	ELEC	UTEP - Sun Bowl Parking Facility	2522 Sun Bowl Drive	El Paso	TX	79922	Level 2		3				Public	
18	ELEC	Rudy's Country Store and BBQ - Tesla Supercharger	6401 South Desert Boulevard	El Paso	TX	79932	DC Fast			8	(2)	(2)	Public	
19	ELEC	JLR EL PASO	1148 Airway Blvd	El Paso	TX	79925	Level 2 & DC Fast		2	1			Public	
20	ELEC	Courtyard by Marriott El Paso East/I-10 - Tesla Destination	12065 Gateway Blvd W	El Paso	TX	79936	Level 2		3				Public	HOTEL
21	ELEC	Cutter Aviation El Paso - Tesla Destination	1771 Shuttle Columbia Dr	El Paso	TX	79925	Level 2		2				Public	AIRPORT
22	ELEC	Home2 Suites by Hilton El Paso Airport - Tesla Destination	6308 Montana Ave	El Paso	TX	79925	Level 2		3				Public	HOTEL
23	ELEC	Walmart 512 - El Paso, TX	10727 Gateway Blvd West	El Paso	TX	79935	DC Fast			4	(2)	(2)	Public	
24	ELEC	HACEP- Williams Community	314 Resler Drive	El Paso	TX	79912	Level 2		1				Public	
25	ELEC	HACEP- Central Office Loading Dock	5300 East Paisano Drive	El Paso	TX	79905	Level 2		1				Public	
26	ELEC	HACEP- Central Office Guard Shack	5301 East Paisano Drive	El Paso	TX	79905	Level 2		1				Public	
27	ELEC	HACEP- Paisano Green	4000 E Paisano Drive	El Paso	TX	79905	Level 2		1				Public	
28	ELEC	EPCC- Valle Verde Campus- Advanced Technology Center	919 Hunter Drive	El Paso	TX	79915	Level 2		1				Public	
29	ELEC	The Fountains at Farah	8889 Gateway Boulevard West	El Paso	TX	79925	Level 2		5				Public	
30	ELEC	Hampton Inn Van Horn - Tesla Supercharger	1921 Frontage Rd.	Van Horn	TX	79855	DC Fast			8			Public	
31	ELEC	Days Inn - Van Horn, TX	600 E Broadway	Van Horn	TX	79855	DC Fast			4			Public	
32	ELEC	Texas Tech Health Science Center	4801 Alberta Ave 3rd Fl	El Paso	TX	79905	Level 2		3				Public	
33	ELEC	Charlie Clark Nissan	6451 S Desert Blvd	El Paso	TX	79932	Level 2		1				Public	
34	ELEC	Whole Foods Market	100 Pitt St	El Paso	TX	79912	Level 2		2				Public	
35	ELEC	Sunland Park Crysler	950 Crockett St.	El Paso	TX	79922	Level 2		1				Public	
36	ELEC	Casa Ford	5815 Montana Ave	El Paso	TX	79925	Level 2		1				Public	
37	ELEC	Deadbeach Brewery	406 Durango St.	El Paso	TX	79901	Level 2		1				Public	

1) EPE does not have detailed information for all the public charging stations above EPE installs survey meters (interval data recorders) to gather charging information on customers enrolled in both the Texas Electric Vehicle Charging Rate as well as DC fast charging stations in its retail service territory. However this data is very limited in size and history. At the end of November 2019, EPE only has 2 DC fast charging stations with interval survey meters, and these meters were installed in August and October of this year.

2) EPE does not survey meter public charging stations because they generally are not separately metered from the rest of the premise, so EPE cannot analyze the charging load separately

Project No. 49125
Attachment 4
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