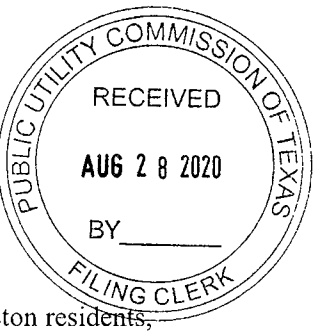
Control Number: 49125

Item Number: 42

Addendum StartPage: 0

PROJECT NO. 49125

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



COMMENTS OF EVOLVE HOUSTON

I. INTRODUCTION

Inspired by a deep commitment to the health and well-being of all Greater Houston residents, Mayor Sylvester Turner championed bold action to improve air quality and reduce greenhouse gas (GHG) emissions in Houston. Recognizing transportation as a key opportunity area, Mayor Turner, in Houston's Climate Action Plan, called for the creation of a public-private partnership to accelerate Electric Vehicle (EV) adoption throughout the region. He engaged local leaders to join him in this effort, thus laying the foundation of EVolve Houston (EVH), a coalition of sustainability-minded civic, business, and academic leaders who want to accelerate clean transportation through electrification. Alongside the City of Houston, EVH was founded in 2019 by NRG Energy, Shell, CenterPoint Energy and the University of Houston, and is operated by LDR Advisory Partners.

EVH targets the regional EV market to reach a 30% share of annual new car sales by 2030, allowing Greater Houston area residents to enjoy improved air quality, reduced greenhouse gas emissions, new clean energy careers, and affordable clean transportation. EVH supports policies that promote the following:

Customer Education

EVH supports prudent local, state, and federal policies that increase fact-based awareness of the benefits of EV adoption.

Greenhouse Gas (GHG) Emissions Reduction

EVH supports prudent local, state and federal policies that encourage decarbonization of transportation to achieve GHG reduction.

Purchase Incentives

EVH supports prudent local, state, and federal government policies that increase EV purchases by providing incentives for new and used electric vehicle purchases by public entities, commercial enterprises, or private citizens.

Driver-ship Incentives

EVH supports prudent local and state policies that encourage EV driving by granting EVs access to HOV lanes and priority parking spaces.

Charging Infrastructure

Recognizing that most charging currently occurs at home and work, EVH supports prudent local, state, and federal policies that increase equitable access to EV charging infrastructure by providing incentives for the installation of sufficient EV charging ports to serve a diversity of EV charging needs and use cases. These include regional and inter-city travel, evacuation routes, disadvantaged communities, school districts, ports, workplaces, multi-unit dwellings, and commercial depots. As part of this, Evolve Houston also supports prudent public and private investments that support and incentivize the installation of EV charging infrastructure.

Codes & Standards

EVH supports prudent local, state, and federal policies that increase the availability and convenience of public EV charging infrastructure by promoting standards for signage and equipment interoperability, and by implementing EV ready building codes. With respect to interoperability, EVH supports the inclusion of minimum standards in programs intended to incentivize or support the installation of EV charging stations.

Economic Development

Evolve Houston supports prudent local, state, and federal policies that attract economic development in EV value chain industries and the development of local talent needed to support these industries.

II. COMMENTS

1) As a matter of policy, which entity or entities should be permitted to own or operate an electric vehicle charging station in the Texas competitive electric market? Is a different ownership structure appropriate for service areas not open to retail competition?

EVolve Houston (EVH) supports the mass adoption of EVs in the Houston area and in Texas generally. Our members include a private EV charging company, an investor-owned electric utility, a retail electric provider, and growing EV owners and users (City of Houston, University of Houston). Therefore, EVH's perspective covers nearly all aspects of the EV value chain. In the Houston area, there are currently approximately 500 EV charging stations accessible to the public offering nearly 1,500 plugs. While this is an admirable start, residents of our region need substantially more to support both current and future transportation needs as Texans continue to purchase EVs in greater numbers.

To do this, Texas should consider developing flexible market rules that allow market participants to engage in growing the EV market and improving the business case for charging station development while protecting the customer's interest. This will necessitate creative thinking, partnerships, and approaches that involve market participants in all aspects of the industry.

While EVH supports the continued ownership and operation of EV charging stations by non-utility, private entities in the Texas competitive market, much can and should be done to clarify the regulatory aspects of EV charging stations. EVH encourages the Commission to adopt rules that ensure barriers to entry are low, ensure continued investment in EV charging stations, ensure continued investment in electric utility infrastructure, and ensure customers are protected from bearing undue costs.

2) Is the operation of an electric vehicle charging station a retail sale of electricity?

EVH does not have a comment on this topic.

3) **As a matter of policy, how should the cost of the distribution system infrastructure associated with an electric vehicle charging station be recovered in the Texas competitive electric market?**

EVH supports a reasonable level of electric utility cost recovery of distribution system facility upgrades necessary to support EV charging station development and believes such cost recovery should be allowed if shown to be in the public interest. The cost of this infrastructure can be a significant barrier to EV charging station development, which hinders the growth of a sufficient network of EV charging stations to support EV drivers in Texas. These barriers can be especially difficult to overcome in a variety of unserved or underserved communities. EV charging stations serve the public and deliver benefits far beyond those which accrue to just the EV driver. Therefore, distribution system upgrades needed to serve those charging stations are by extension also serving the public, and EVH believes the electric utility costs for these components should be recoverable through their rates for electric service.

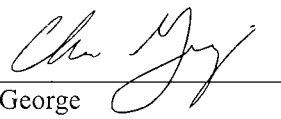
4) **Is the answer to Question 3 different for an electric vehicle charging station located in a remote area, primarily for use by long-distance rather than local motorists?**

EVH does not believe a different cost recovery mechanism should be used for distribution system upgrades necessary to accommodate EV charging stations in rural areas compared to urban areas.

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?**

EVH does not have a comment on this topic.

Respectfully submitted,

By: 

Christopher George
Executive Director, EVolve Houston
1111 Louisiana Street, Floor 42
Houston, Texas 77002
Direct Phone: 512-923-1157
Email: chris.george@evolvehouston.org