



Control Number: 49125



Item Number: 47

Addendum StartPage: 0



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August 28, 2020

Ms. Ana Trevino
Public Utility Commission of Texas
1701 N. Congress Avenue, Room 8-100
P.O. Box 13326
Austin, TX 78711-3326

RE: Project No. 49125, Review of Issues Related to Electric Vehicles

Dear Ms. Trevino:

I write on behalf of TechNet to provide comments on Project No. 49125, a review of issues related to electric vehicles (EV).

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents more than three million employees and countless customers in the fields of information technology, e-commerce, the sharing and gig economies, advanced energy, cybersecurity, venture capital, and finance.

Our member companies include current and potential adopters of electric vehicles, as well as companies offering electric vehicle charging solutions. As electric vehicle adoption increases not only in Texas, but across the globe, TechNet's members investing in the infrastructure necessary to charge electric vehicles and do so in ways that support efficient grid operations and provide operational savings through reduced fuel cost. We appreciate the Commission's inquiry into electric vehicles and offer the following comments for the Commission's consideration.

TechNet Supports Broad Ownership and Operation of Electric Vehicle Charging Stations in Texas

As a matter of policy, TechNet encourages the Commission to ensure a competitive and diverse marketplace for EV charging services. The ownership and operation of EV charging stations can take many forms. Some companies may choose to own and operate EV charging stations at their corporate offices to provide charging services to employees and visitors. Some companies may want to build their own charging infrastructure as a way to fuel their fleet of electric vehicles. Some retail companies may allow a third party to own and operate charging services on their property as a way to attract new customers. Some traditional fueling stations may

installing charging stations as a way to continue to serve their customers who have chosen a different fuel type. TechNet believes each of these entities should not only be allowed but also encouraged to install electric vehicle charging stations to support the broad adoption of electric vehicles throughout Texas.

While there are many differences between the areas of Texas that are in the competitive electric market and those that are not open to retail competition, TechNet does not believe that alone should determine who should be permitted to own or operate EV charging stations. TechNet believes that most, if not all, Texas electric customers should be able to own and operate EV charging stations provided they do so in accordance with all other state and local laws and ordinances.

The Operation of Electric Vehicle Charging Stations is Not a Retail Sale of Electricity

EV charging stations are not a retail sale of electricity; rather, EV charging stations are a retail customer of electricity. EV charging stations use the electricity which they purchase from their utility or retail provider to provide a service: charging an EV battery for EV drivers. EV charging station operators use electricity as one input in the service they provide to EV drivers. There are any number of other services that use electricity as a primary input including industrial manufacturing, lighting, and laundry services. Although electricity may be a necessary component of each of those services, they each use special equipment on their side of the electric meter to provide the final service to their customer.

TechNet Supports Distribution System Investments to Serve EV Charging Stations

As a baseline policy, investments in distribution system infrastructure associated with EV charging stations should be recovered in the same way investments to support any other new load would be recovered. However, TechNet believes that as a public policy to expand the availability of charging stations, distribution utilities should be encouraged to bring forward proposals in two areas. First, TechNet believes distribution utilities should bring forward proposals to further incentivize the near-term installation of charging infrastructure and charging during off peak hours.

Second, utilities can play an expanded role in providing “make-ready infrastructure” to encourage the deployment of EV charging stations. Make-ready infrastructure generally refers to upgrades required on the customer-side of the meter to support charging stations such as additional wiring, conduit, trenching, and panels needed to bring service from the panel to the location where the charger would be located. Both of these investments will result in an increase in kilowatt-hour sales and, when charging is done during off-peak times, put downward pressure on rates for all customers by allowing the distribution utility to spread its fixed cost across a great number of kilowatt-hour sales.

Thank you for your consideration.

Sincerely,

David Edmonson
Executive Director, Texas & Southeast