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Adopt a Charger

February 3, 2023

Public Utility Commission of Texas

RE: Vertically Integrated Utility Ownership of Electric Vehicle Charging Infrastructure

Adopt a Charger, Inc. is a 501(c)3 non-profit organization that has facilitated EV charging installations in 12 states. Our mission is to raise awareness of plug-in electric vehicles (PEV) by broadening EV charging infrastructure. Our unique approach matches a funding source with a high-profile destination like National Parks, State Parks, museums and universities. We solicit funding to install “free to the user” EV charging to encourage communication between the EV curious and actual owners, who have proven to be enthusiastic sales people for the new technology. AAC acknowledges that people need to be able to see cars plugged in to make the connection that these vehicles run on electricity.

AAC specializes in inexpensive, noncomplex, **reliable** solutions, where drivers simply pull up and plug in. There is no need for membership, RFID card or authorization of payment. Included in the project budget is 3 years’ operation and maintenance. Typically, the only cost to the site host is the relatively insignificant cost of the additional electricity. Because these chargers are offered “free of charge” to the driver, we get high utilization and maximum exposure of PEV. The AAC nonprofit model has proven to be a successful example of public/private partnerships, and all projects we have been involved in resulted in higher than average amounts of match funding.

AAC is grateful to have received funding for projects from the Entergy Environmental Initiatives Fund to expand EV charging in Entergy Arkansas territory. Since April 2021, we have successfully executed installations in the City of Lonoke, Eureka Springs Visitor Center, Little Rock Tech Park, Hot Springs Visitor Center, the Art and Science Center of Pine Bluff, the Mid America Science Museum, Cabot City Hall, Cabot Recreation Center, the Audubon Delta, the Murray Art’s District in El Dorado, and Beatles Park in Walnut Ridge. We are currently working to expand the program to accommodate the overwhelming demand for Level 2, destination charging across the Natural State.

AAC offers the following recommendations:

- 1. Stay flexible to allow for a variety of business models and approaches, which will spark innovation. Give site hosts “consumers choice” in their preferred method of delivery, to best suit their needs, and customize the approach for their unique circumstance.**

The strict eligibility requirements proposed by the DOE funding programs make it impossible for Adopt a Charger to utilize Federal and State funding to expand an alternative business model that has proven successful at raising awareness of PEV, maximizing GHG reduction, and

increasing electric Vehicle Miles Traveled (eVMT). Most concerning is that AAC has been effective at installing EV charging in hard to commercialize locations, including disadvantaged communities and rural areas, where other business models do not make sense.

It is very important that the Texas PUC remain focused on policies that incentivize the adoption of plug-in vehicles, promote innovation and promote consumer choice. There is a lot to learn from countries like Norway and the Netherlands, where EV sales have reached 80% of overall vehicle sales. Wireless charging, Level 1, and deviation from cord connected Level 2, are all approaches that should be explored. The result may prove to decrease liability and theft, at the same time increasing reliability and cost savings.

2. Reexamine priorities and focus on how to best serve the end user. The EV driver is the customer.

We encourage PUC staff to remain focused on the goal of selling plug-in vehicles. We are still in the early stages of PEV penetration. Overly complicated systems increase the potential for problems, which make Electric Vehicle Supply Equipment less reliable, and give the message that the electrification of transportation is not ready for prime time.

The increased burden of satisfying ADA regulations, networking requirements, need for credit card readers, and standard weights & measurement compliance has dramatically increased the average cost per project. The burden of the escalating cost of infrastructure is passed on to the site host, making them less likely to install Electric Vehicle Charging Stations, or to the EV drivers which makes public charging more expensive than buying gasoline.

3. Ease up restrictions on utility ownership and operation of EV charging infrastructure.

There have been significant investments in charging infrastructure over the past 14 years, and we are still far from having an adequate number of charging stations to meet our goals. Many of the state public utility commissions have approved pilot programs that already authorize using rate payer funding to pay for make ready installations, and bringing power to the curb is the most expensive part of any project. By embracing utility capital for owning and operating EVCS, we can drive down costs and make state and federal funding go further.

Every EV driver already has a relationship with their electrical utility, at their home where they charge their car 80-90% of the time. They also have confidence that when the power goes down, the utility will take responsibility and restore service expeditiously.

Thanks for considering my suggestions,

Kitty Adams
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