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Filing Date - 2023-08-24 03:21:39 PM

Control Number - 55338

Item Number - 16



Filing Receipt

Received - 2022-11-01 04:45:41 PM
Control Number - 53719
ItemNumber - 272



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November 1, 2022

Via Electronic Filing

Public Utility Commission of Texas
Central Records
1701 N. Congress Avenue
Austin, TX 78701

RE: Docket No. 53719; SOAH Docket No. 473-22-04394; Application of Entergy Texas, Inc. for Authority to Change Rates – FlashParking, Inc.’s Testimony of Matthew McCaffree (Item #238)

Dear Central Records:

FlashParking, Inc. submits this letter explaining an E-Filing mistake in the filing of its Testimony of Matthew McCaffree in the above referenced docket. Pages 2 and 3 of the testimony were corrupted when filing the PDF version. With this letter, FlashParking is filing a corrected copy of the testimony and request to void Item 238.

Thank you for your assistance in this matter. If you have any questions, please contact me at (479) 366-4650 or chendrix@demandcontrol2.com.

Respectfully yours,

Chris Hendrix

Chris Hendrix

**SOAH DOCKET NO. 473-22-04394
PUC DOCKET NO. 53719**

APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**DIRECT TESTIMONY

OF

MATTHEW MCCAFFREE**

**ON BEHALF OF

FLASHPARKING, INC.**

OCTOBER 26, 2022

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ATTACHMENTS

Attachment MM-1 Curriculum Vitae

I. INTRODUCTION

Q. Please state your name, occupation, and business address.

A. My name is Matthew McCaffree. I am the Vice President of Utility Market Development for Flash Parking, Inc.

Q. Please briefly describe your professional background.

A. I have worked in utility regulatory and investment issues throughout my career as an economic consultant, regulatory subject matter expert for various utility industry vendors, and as the regulatory lead for a national utility trade association. I have served in various advisory positions for advocacy organizations and was a faculty member at the NARUC Rate School from 2012 to 2015. I hold a Master's in Law and Diplomacy from Tufts University and a Bachelor's in International Relations from Webster University. My curriculum vitae is provided as Attachment MM-1.

Q. Have you previously provided testimony in a proceeding before the Public Utility Commission of Texas (Commission)?

A. No, I have not previously provided testimony in a proceeding before this Commission, but I have appeared before public utility commissions in a number of states, including California, Connecticut, Florida, Illinois, Indiana, Maryland, Massachusetts, New Mexico and New York.

Q. Please give a brief overview of FlashParking.

1 A. FlashParking, a company headquartered at 3801 S. Capitol of Texas Highway, Suite
2 250, Austin, Texas, is a national leader in commercial parking technology and
3 connected mobility technology solutions. In addition to providing software and on-site
4 hardware parking solutions to over 10,000 sites across the country, the company also
5 provides electric vehicle (EV) charging solutions, built specifically to meet the growing
6 demand for urban EV charging and address unique infrastructure challenges. The
7 company's EV charging solutions focus on Level 2 charging and enable parking
8 operators to manage primary traffic, off-peak hours, and potentially balance demands
9 on the electric grid. FlashParking works with parking operators, commercial real estate
10 companies, and other stakeholders and is actively working with clients to deploy
11 charging infrastructure across the country. FlashParking seeks to work cooperatively
12 with all stakeholders including Entergy to facilitate development of EV charging across
13 Texas.

14 **Q. What is FlashParking's perspective on development of EV charging in vertically**
15 **integrated utility service areas?**

16 A. FlashParking is a national leader in the management and logistics of vehicle parking
17 and is, consequently, increasingly involved in the business of EV charging. Our
18 technology is able to monitor how parking assets are used, for how long, and by whom,
19 which allows us to increase utilization of parking assets for our clients. Like our
20 industry peers, we recognize that there are currently a number of choices for EV

1 charging and have created a platform that works both with our deployed hardware and
2 other EVSE providers. As more of these resources hit the market, we similarly
3 recognize the critical role of distribution utilities like Entergy in providing the
4 distribution and make-ready infrastructure to enable widely-available, practical, and
5 affordable EV charging sites. Our engagement in regulatory matters across the country
6 is driven primarily by our understanding of the role of the utility and, to a lesser degree,
7 by concerns that this rapidly evolving industry could be slowed by fragmenting an
8 already competitive EVSE market.

9 **II. SCOPE AND PURPOSE OF DIRECT TESTIMONY**

10 **Q. On whose behalf are you testifying in this proceeding?**

11 A. I am testifying on behalf of FlashParking Inc.

12 **Q. What is the purpose of your direct testimony in this proceeding?**

13 A. My testimony responds to two tariff proposals in Entergy's Application in this
14 proceeding related to electric vehicle charging stations.

15 **Q. Was this testimony prepared by you or under your supervision?**

16 A. Yes, it was.
17

18 **III. SUMMARY OF RECOMMENDATIONS**

19 **Q. Please summarize your recommendations regarding Entergy's application.**

1 A. My testimony addresses the following:

2 1. Entergy's proposed tariff rider for transportation electrification and related
3 infrastructure and equipment (TECI).

4 2. Entergy's proposed tariff rider for targeted demand charge relief (TECDA) for
5 non-residential electric vehicle charging stations and taking new service under
6 schedule GS.

7 **Q. What have you reviewed to prepare this testimony?**

8 A. I am generally familiar with Entergy's application. I have reviewed specific portions
9 of the Application that are specific to the proposed tariffs regarding electric vehicle
10 charging.

11

12

13 **IV. PROPOSED TARIFF RIDER TECI-1**

14 **Q. What is your understanding of Entergy's proposed Tariff Rider TECI-1?**

15 A. The rider allows non-residential Entergy customers to distribute the costs of installing
16 one or more EV chargers and related infrastructure over a customer-selected Recovery
17 Term, while also allowing the customer to determine the level of Entergy's investment
18 at that site. It allows for partnerships between Entergy and commercial installers of
19 electric vehicle charging stations. This service would allow the utility to plan,

1 construct, own, operate, and maintain electric vehicle charging stations with costs to be
2 recovered in the electric bill of the participating commercial customer.

3 **Q. Please describe the effect of the proposed tariff on electric vehicle charging**
4 **stations.**

5 A. The Entergy proposal appears to be competitively neutral and would allow
6 FlashParking and others to develop EV charging stations in Entergy's service area.
7 Should the opportunity arise, FlashParking would have the flexibility to provide
8 alternative or supplemental finance and payment options for an EVSE installation at a
9 customer site, while potentially educating the customer on the opportunity to leverage
10 the TECI Rider to assist in the investment.

11 **Q. Are there any definitional issues you would like to clarify from Entergy's initial**
12 **rate filing?**

13 A. Yes. Ms. Samantha Hill provides a discussion of EVSE original equipment
14 manufacturers (OEMs) on page 24 of her testimony, stating that Entergy will "work
15 with EVSE OEMs to provide and maintain the charging station equipment and cloud
16 software." In my opinion, this more accurately describes an electric vehicle service
17 provider (EVSP), which is in part what FlashParking provides for our clients. Like
18 EVSE manufacturing, this is an increasingly competitive space. We work with EV
19 equipment manufacturers to deploy hardware that they provide, while our company

1 installs and maintains the equipment in the field, as well as creating and maintaining
2 the enabling cloud software. I believe that Entergy's customers would be best served if
3 Entergy broadens their approach to include all EVSPs as potential partners.

4 **Q. Do you have any recommendations for the program as the TECI Rider is made**
5 **available to customers?**

6 A. Given the existing competitive landscape for EVSE and related services, I recommend
7 that Entergy inform customers exploring the TECI Rider that there are installers and
8 service providers that may offer EV charging services that accommodate a customer's
9 specific needs at a competitive price. I would also recommend that the installation and
10 maintenance of EVSE ports not be limited to EVSPs approved solely by the utility.
11
12

13 **V. PROPOSED TARIFF RIDER TECDA-1**

14 **Q. What is the TECDA-1 Rider?**

15 A. The TEDCA-1 Rider helps commercial customers who are trying to install EV charging
16 stations by providing relief from demand charge uncertainty for operating EV charging
17 stations.

18 **Q. Do you propose any changes to Entergy's proposed Rider TEDCA-1?**

1 A. No, FlashParking does not propose any changes and supports Rider TEDCA. The
2 prospect of higher demand charges due to EV-related load creates a disincentive for a
3 customer that would otherwise install EV charging at a commercial property. In my
4 view, this rider serves to lessen that disincentive in order to encourage further EVs
5 adoption in a rapidly expanding market.

6

7 **VI. THE ALJ SHOULD APPROVE THE EV TARIFFS WITHOUT A**
8 **SEVERANCE**

9

10 **Q: Is it appropriate to be deciding Entergy's two tariffs regarding transportation**
11 **electrification (TE) in this proceeding?**

12 **A:** Yes, it is. I believe that a rulemaking for broad policies that would promote the most
13 efficient and effective use of EVs in Texas would be a better forum for the many issues
14 involved, the Public Utility Commission of Texas made it clear on two occasions that
15 they wanted these two policy issues (Preliminary Ordering Issues numbers 68 and 69)
16 decided in this case for this utility. Commissioner Jimmy Glotfelty suggested the two
17 additional issues, at an August Commission meeting, and all Commissioners approved
18 them with the issued Preliminary Order. They affirmed this decision at the PUCT
19 Open Meeting on October 6, 2022, and again voted in favor of keeping these issues in

1 this docket when they approved the denied intervention of Southwestern Public
2 Service.

3 **Q. Do you agree with the decision of the ALJs not to sever these two distinct EV issues**
4 **from the other rate issues in this case?**

5 **A.** Yes, I agree, for several reasons. First, the two policy issues in the Preliminary Order
6 in this case are limited to this utility, this case, and only to the two very defined tariffs.
7 Entergy is proposing a very discrete program regarding EVs with only two tariffs: the
8 TECI-1 Rider and the TECDA-1 Rider. The utility is making it non-discriminatory
9 regarding 1) EV charging station ownership (eliminating any competitive supply issues
10 regarding charging stations), and 2) the necessary supporting infrastructure and
11 incentive for the program. The TECI-1 Rider as proposed would allow for the
12 individual customer to determine the degree of Entergy's involvement, thus allowing
13 the customer to solicit bids on EVSE hardware and EVSP services from the existing
14 competitive landscape. In addition, as the utility has testified, the demand cap in the
15 proposed TECDA-1 Rider will have a *de minimis* impact on all of Entergy's Texas
16 customers.

17 Approval of these two tariffs will not preclude future consideration of alternative or
18 additional EV charging station treatments. There is benefit to customers in, and

1 traveling through, the Entergy footprint that operate electric vehicles. I see no reason
2 to delay implementation of these tariffs by severing them into a separate proceeding.

3 **Q. Are there other reasons you believe these EV issues should go forward in this case**
4 **and not be severed?**

5 **A.** Yes. In spite of the need for a rulemaking for all issues involving the implementation,
6 process, and other policy questions for stakeholders invested in EV and EVSE
7 regulatory issues, this portion of the rate design phase of this case is narrow and
8 focused. As with most rate cases, the Administrative Law Judge has already partitioned
9 Revenue Requirements, Rate Design, and Rate Case Expenses in this case. Entergy's
10 EV tariffs should be addressed in the Rate Design portion of this case. Therefore, those
11 intervenors only interested in the utility's revenue requirements phase, need not attend,
12 address, or brief the other phases.

13 **Q. Are you concerned with the precedents raised in this case?**

14 **A:** No. Entergy should be commended on addressing the needs of its customers: both
15 those that want to drive electric vehicles without "charge anxiety" by having access to
16 charging opportunities across their service territory, and those that want to provide
17 those EV drivers with convenient charging locations.

18 It is important to understand that Entergy is but one type of utility in the entire State of
19 Texas. Entergy is one of the few remaining fully-integrated utilities in Texas, with the

1 exception of electric cooperatives and municipally-owned utilities which are only
 2 partly regulated by the PUCT. The resolution to the two issues in this Preliminary
 3 Order should take into consideration the uniqueness of the applying utility, including,
 4 but not limited to, its service territory, its and the lack of retail competition.

5 Therefore, this should not be the forum to address the many global issues surrounding
 6 EVs from the Commission's perspective, much less resolved in this one rate case.

7 **Q. Do you have concerns that addressing the two EV tariffs in this case will cause**
 8 **undue and additional expenses for Entergy's rate case expenses?**

9 **A.** Yes, Entergy will incur additional expenses if they are required to conduct two separate
 10 hearings. The Commission has the continued discretion to pursue a rulemaking
 11 regarding charging stations, the necessary infrastructure, rate structures, broad policy
 12 issues promoting EVs, and other considerations for ensuring the best practices for
 13 promoting EVs in Texas. It is my opinion that consideration of these tariffs in this
 14 case does not preclude further review in a non-rate case proceeding.

15

16

17 **VI. CONCLUSION**

18 **Q. Does this conclude your direct testimony?**

19 **A.** Yes, it does.

ATTACHMENT MM-1

MATTHEW MCCAFFREE

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1. SUMMARY

I am an experienced utility and regulatory professional specializing in electric transportation, cost of service regulation, utility rate issues, long-term planning and capital investment issues for network industries. I am currently focused on EV charging opportunities and electrified mobility solutions in core urban areas.

2. EXPERIENCE

FlashParking / Vice President, Utility Market Development

1. PRESENT - DENVER, CO

Responsible for leading efforts to collaborate with utilities and identify wholesale market opportunities for the largest parking technology company in the United States, as well as scouting locations for large-scale EVSE installations in metropolitan areas across the country.

Itron / Sr. Principal, Regulatory Affairs

1. 2017 - 2022, WASHINGTON, DC AND DENVER, CO

Led regulatory efforts in wholesale markets, distributed energy management, and for key accounts in Itron's advanced metering and smart grid business lines, on behalf of the world's largest smart metering and smart grid provider. Also represented the company before regulators, consumer advocates, and other key stakeholders, and routinely spoke at industry events across the country.

Comverge / Sr. Director, Regulatory Strategy

1. 2015 - 2017, WASHINGTON, DC

Drove regulatory strategy for one of the longest running and respected energy management providers in the country - and the largest mass-market DR provider - while the company was on a clear acquisition path. Built and led a team focused on regulatory developments at the state and RTO level, supported the company's quarterly growth over a three year period, and set

Comverge's regulatory strategy in direct coordination with the CEO and VP of Sales. Transitioned to a parallel position at Itron, Inc. after acquisition in 2017.

The National Association of Water Companies / Director, State Regulatory Relations

1. 2012 - 2015, WASHINGTON, DC

Responsible for setting the regulatory advocacy and research agenda for the trade association representing the private water services industry, which serves one in four Americans. Served as the primary industry liaison with the National Association of Regulatory Utility Commissioners (NARUC) and the NARUC Water Committee, as well as the NAWC lead expert in cost of service regulation and alternative rate design

Led state-level efforts on addressing ROE gaps due to regulatory lag and best practices for small water systems, resulting in two resolutions adopted by NARUC.

Opower / Director, Regulatory Research, Evaluation, Measurement & Verification

1. 2010 - 2012, WASHINGTON, DC

Served as the regulatory expert and primary contact for Opower with independent evaluators, regulators and commission staff across the United States, as well as Australia and the UK.

Coordinated regulatory strategy across the country, including direct meetings and testimony with state regulators, and authoring testimony on behalf of Opower.

The Institute for Electric Efficiency (IEE) / Manager, Electric Efficiency

1. 2008 - 2010, WASHINGTON, DC

Served as the primary liaison with state regulators and IEE member utilities, responsible for nearly 75% of the electricity delivered in the U.S., to track and analyze cost recovery, lost margin recovery, and incentive mechanisms for utility-administered efficiency and demand response programs.

Managed multi-disciplinary research on regulatory developments across the U.S. that impact members' energy efficiency efforts and spending

Authored IEE quarterly research and industry tracking materials that were used across the industry, Utility-Scale Smart Meter Deployments and State Energy Efficiency Regulatory Frameworks.

The Brattle Group/ Special Assistant to the Chairman

1. 2007 - 2008, WASHINGTON, DC

Served as liaison for the Chairman in legislative meetings and with various energy policy groups, and managed business development, policy projects and marketing efforts.

Managed interdisciplinary research for state and federal legislation relevant to climate change, energy efficiency and demand side management practices at the firm.

The Brookings Institution

1. 2006 - 2007, WASHINGTON, DC

The International Telecommunication Union

1. 2002 - 2004, GENEVA, SWITZERLAND

3. EDUCATION

The Fletcher School, Tufts University/ Master of Arts, Law & Diplomacy

1. 2004 - 2006, MEDFORD, MA

- Graduate thesis: *Electricity Restructuring in the United States: The Promise of Municipal Aggregation & the Future of Public Power*; Advisor, William Moomaw

- Fields of Study: International Business Relations, International Business & Economic Law, International Information & Communication

- Coursework divided between business analytics and international business law

**Webster University / Bachelor of Arts, International Relations
(emphasis Economics) *cum laude***

1. GENEVA, SWITZERLAND

**4. ADVISORY
POSITIONS**

Board Member/Treasurer, Advanced Energy Management Alliance (2015-2022)

Faculty member, NARUC Rate School (2012-2015)

Advisory Board member, New Mexico State University Center for Public Utilities (2012-2017)

Advisor, EnergySavvy (2013-2015)

Publications, presentations, and further information available upon request.