BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

In Re:	**:**	
	:	
GEORGIA POWER COMPANY'S	**:**	**DOCKET NO. 44280**
2022 RATE CASE	**:**	
	:	

DIRECT TESTIMONY OF

JUSTIN D. WILSON

ON BEHALF OF

CHARGEPOINT, INC.

October 20, 2022

I. INTRODUCTION AND SUMMARY OF RECOMMENDATIONS.

Q: Please state your name.

A: My name is Justin D. Wilson.

Q: By whom are you employed and in what position?

A: I am Director of Utility Partnerships and Regulatory Affairs at ChargePoint, Inc. (ChargePoint).

Q: Please describe your background, experience and expertise.

A: In my current role, I direct ChargePoint's participation in utility programs and our regulatory efforts in North America. I engage on behalf of ChargePoint at utility regulatory commissions and other state agencies to promote public policies that expand electric vehicle infrastructure and advance best practices within the electric vehicle charging industry. I received a bachelor's degree in Public Administration from the University of Arkansas and a master's degree in Public Administration from the University of Colorado Denver.

Q: Are you sponsoring any exhibits?

A: Yes, attached to my testimony is ChargePoint Exhibit 1.1, which is my CV, and ChargePoint Exhibit 1.2, which is titled: "States that Allow Charging per kWh."

Q: Please describe ChargePoint.

A: ChargePoint is a world leading electric vehicle (EV) charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to

support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

Q: What is the purpose of your Direct Testimony?

A: The purpose of my Direct Testimony is to respond to the direct testimony of Georgia Power Company (Georgia Power or the Company) witnesses Christopher C. Womack and Larry T. Legg regarding the Company's proposed EV charging investments and proposed new rider rate schedule for separately metered non-residential EV charging, Schedule Charge It Electric Vehicle (Rider CIEV-1). I also address the ability of EV charging station operators (site hosts) to sell EV charging services by the kilowatt-hour in Georgia Power's service territory.

Q: Please summarize your recommendations to the Commission.

A: ChargePoint recommends that the Commission:

- Approve Georgia Power's proposed investments in community charging facilities and EV charging infrastructure upgrades across the state;
- Approve Rider CIEV-1 and direct Georgia Power to allow any qualifying customer to take service on it (not just new customers);
- Clarify that the sale of EV charging services by non-utilities shall not be considered resale of electricity.

II. Georgia Power's EV programs

Q: What will you address in this section of your testimony?

A: In this section of my testimony, I will address the ability for site hosts that participate in Georgia Power's EV make-ready and community charging infrastructure program proposals to choose their preferred charging equipment.

Q: Do Georgia Power's proposals allow for site hosts to choose the charging equipment installed on their property?

A: Yes. Based on discussions with Georgia Power, it is my understanding that site hosts will continue to have the ability to choose their charging equipment. I use the term "site host" to refer to the owner or lessor of the property on which an EV charging station is located. Site hosts include residential customers; owners of multi-family housing (MFH); commercial customers that offer charging to the public, their customers, and/or their employees; fleet owners; and government entities.

Q: Why is site host choice important?

A: Site host choice is the critical program design element that allows customers to enjoy the benefits of competition, including innovation, cost-competitiveness, and a variety of products and services to satisfy a variety of needs and preferences. In the competitive marketplace for EV charging services, the ability of site hosts to select the technologies they prefer in an open market, invest their own capital, seek any incentives available through public agencies or utilities, and, in the case of commercial stations, offer competitive charging services to attract drivers and recoup necessary expenses, is paramount. Ensuring that site hosts can choose the charging solution that works best for them ensures that the competitive dynamics that exist in the absence of a utility program will function within the confines of the utility program, to the benefit of customers.

Q: Has Georgia Power proposed to increase investments in community electric vehicle charging facilities?

A: Yes, Georgia Power witness Womack states that "over the next three years" Georgia Power will "increase… investments in community electric vehicle ('EV') charging facilities and

necessary electric transportation infrastructure upgrades to support customer EV charging."

Q: Does ChargePoint support these investments?

A: Yes, ChargePoint supports Georgia Power's proposed investments, so long as site host choice remains a tenet of the programs moving forward.

Q: What is your recommendation?

A: ChargePoint recommends that the Commission approve Georgia Power's proposed investments in community charging facilities and EV charging infrastructure upgrades across the state.

III. Proposed Rider CIEV-1

Q: Please summarize Georgia Power's proposed Rider CIEV-1.

A: Georgia Power proposes to establish a new rider rate schedule for separately metered non-residential EV charging, designated as Schedule Charge It Electric Vehicle (Rider CIEV-1).[1] Rider CIEV-1 reduces billed demand charges for up to forty-eight months, or when a customer's rolling twelve-month load factor reaches 15% or greater.[2]

Q: Does ChargePoint support the design of Rider CIEV?

A: Yes, ChargePoint supports Rider CIEV-1 as designed by Georgia Power. The proposed Rider is a positive step toward increasing EV charger penetration in the state, which in turn will benefit Georgia Power's customers. Demand charges can pose a significant challenge and expense for EV charging station site hosts, especially when utilization of the charger is low, which is often the case currently as EV adoption is still relatively low. In low

[1] Proposed Original Page No. 12.40.
[2] *Id.*

utilization scenarios, a site host may experience a relatively small number of charging sessions in a month, but if several vehicles charge at the same time, the demand charge will be set for the entire month (and potentially much longer when there is a demand ratchet provision, as there is for schedules PLS, PLM, and PLL). Rider CIEV-1 will effectively mitigate the impact of demand charges on EV charging station site hosts for a four-year period while their load factor is relatively low.

Q: Do you recommend any modifications to Rider CIEV-1?

A: ChargePoint has one minor recommendation to the Applicability section of Rider CIEV-1. As proposed, Rider CIEV-1 would only be available to new services dedicated to EV charging that start service on or after January 1, 2023.[3] There is no reason to restrict the availability of this rider to new customers. Existing customers that have already installed EV charging stations behind a dedicated meter should have access to the same rates and rate riders as new customers, especially rate riders like Rider CIEV-1 that will allow them to more cost-effectively manage their EV charging load. The Commission should direct Georgia Power to allow any customer with a dedicated meter for EV charging to take service on Rider CIEV-1.

Q: What is your recommendation?

A: ChargePoint recommends that the Commission approve Georgia Power's Rider CIEV-1 and direct Georgia Power to allow any qualifying customer to take service on it (not just new customers).

[3] Proposed Original Page No. 12.40.

IV. Enable Site Hosts to Price EV Charging Services on a $/kWh basis.

Q: What will you address in this section of your testimony?

A: In this section of my testimony, I will address the ability of EV charging station operators (site hosts) to sell EV charging services by the kilowatt-hour in Georgia. As I will discuss, providing regulatory certainty to non-utilities that they can charge a $/kWh price for EV charging is crucial to encouraging EV charging station deployment and EV adoption.

Q: Can non-utility site hosts currently sell EV charging services on a $/kWh basis in Georgia Power's Service Territory?

A: No. A non-utility site host would risk violating Georgia Power's prohibition on resale of electricity, which appears in Georgia Power's tariff.[4] Because historically the only commodity or service priced on a $/kWh basis was electricity, any person or entity using a $/kWh pricing arrangement is generally considered to be reselling electricity. The current uncertainty and risk that a site host would violate Georgia Power's tariff by charging drivers to charge their EVs on a $/kWh basis effectively prevents site hosts from doing so in Georgia. For the reasons I will discuss, ChargePoint recommends that the Commission clarify that EV charging station site hosts do not resell electricity.

Q: Do EV charging stations resell electricity?

A: No. However, as discussed above, any $/kWh pricing arrangement is generally deemed to be a resale of electricity, which is why EV charging station site hosts risk violating Georgia Power's tariff if they sell EV charging services on a $/kWh basis. In reality, EV charging

[4] Georgia Power Company, Rules and Regulations for Electric Service, General Rules, Page Number 1.11, ¶ 6 ("Electric service will not be supplied in competition with the Company's own service, either wholesale or retail, or for distribution or supply or resale in any territory occupied by the distribution system of the Company, or proposed to be occupied by the distribution system of the Company."), included in MFR F-1 of Georgia Power's initial filing.

stations use electricity to provide a service; specifically, the service of charging the battery of an EV. While the amount of energy stored in a battery is measured in kilowatt-hours, the EV charging station is not reselling electricity but rather using electricity to perform the value-added service of charging a battery (in which energy is stored).

The nature of this service is entirely distinct from the way that a utility sells electricity. A utility sells electricity as a commodity that a customer can use for a wide-variety of purposes, such as powering an air conditioner, cooking, or charging their smart phone. By contrast, an EV charging station uses electricity for a single purpose – charging the battery of an EV – and the EV driver can only use the energy stored in the EV's battery for a single purpose – operating the EV.

Like EV charging station site hosts, many businesses use electricity to provide services to the public. For example, a laundromat uses electricity to run its business, but it would be inaccurate to say that the laundromat resells electricity to its customers that the customers use to wash and dry their clothes. Rather, the more accurate description of the laundromat's business is that it uses electricity to provide the services of washing and drying customers' clothes. By the same token, it is inaccurate to say that an EV charging station site host is reselling electricity to EV drivers. Rather, the accurate way to describe the transaction between a site host and an EV driver is that the site host uses electricity to provide the service of charging the battery of an EV.

Q: If site hosts cannot charge drivers on a $/kWh basis, how do they price charging services?

A: The most common alternative pricing arrangement non-utility site hosts use is to charge drivers by the minute ($/minute). Other site hosts provide charging for free as an amenity

to support their primary business, such as a retail store or a restaurant, but free charging is typically limited to Level 2 chargers and is not a sustainable business model for deploying DC fast chargers.

Q: Why does it make sense to allow EV charging station site hosts to charge EV drivers on a $/kWh basis?

A: EV charging station site hosts provide a service: namely, the service of charging the batteries of EVs. The amount of energy that is stored in a battery is measured in kilowatt-hours. Allowing EV charging station site hosts to price charging services on a $/kWh basis will allow site hosts to charge drivers accurately and fairly for the battery charging service they provide.

Q: What are the challenges that arise from charging EV drivers by the minute?

A: A per-minute pricing arrangement does not account for the amount of energy that is delivered to an EV's battery. Because different EV models have different maximum charging speeds, billing on a per-minute basis leads EV drivers to pay varying costs for the same amount of energy consumed. For example, it may take only 30 minutes for a newer model EV with a high maximum charging speed to add 30 kWh of charge at a DC fast charger. However, at that same fast charger, it could take 90 minutes for an older EV with a lower maximum charging speed to add the same 30 kWh of charge. If the charger used a $/minute pricing scheme, the older EV would pay three times as much to add the exact same amount of charge to its battery. In addition to being disconnected from the amount of energy delivered to the battery the per-minute pricing scheme has the effect of negatively impacting those EV drivers with older vehicle models.

Q: Have other states addressed this issue?

A: Yes. EV charging station site hosts may charge EV drivers on a $/kWh basis in each of the 43 states that have addressed this issue, as well as in the District of Columbia and Puerto Rico. Please see ChargePoint Exhibit 1.2.

It is worth noting that the uncertainty and risk faced by site hosts preventing them from charging on a $/kWh basis has arisen in different ways in different states. In some states this issue has been resolved through a statutory change, in other states through a statewide regulatory commission proceeding, and other states through a utility-specific proceeding (such as this docket). Nevertheless, in each of the 43 states and the District of Columbia the result is the same: EV charging station site hosts may charge EV drivers using their preferred pricing arrangement, including on a $/kWh basis.

Q: Has the federal government addressed this issue?

A: Yes. The Federal Highway Administration (FHWA) is in the process of implementing the National Electric Vehicle Infrastructure (NEVI) formula program, which was created by the Infrastructure Investment and Jobs Act (IIJA) passed in 2021. Based on current estimates, Georgia is expected to receive $135 million over 5 years to support the expansion of EV charging; Georgia will also have the opportunity to apply for $2.5 billion in grant funding dedicated to EV charging.[5] In its Notice of Proposed Rulemaking, the FHWA proposed the following requirement for chargers that receive NEVI funding:

[5] Federal Highway Administration, National Electric Vehicle Infrastructure (NEVI) Formula Program Guidance (Feb. 2022), available at: https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/nominations/90d_nevi_formula_program_guidance.pdf).

"Chargers must display and base the price for electricity to charge in $/kWh."[6] However, any EV charging station that followed this federal guidance would violate Georgia Power's tariff prohibition on resale of electricity.

Q: Are any tariff changes needed to resolve this issue?

A: No, it is not necessary to modify Georgia Power's tariff to resolve this issue. The Commission can resolve this issue simply by clarifying that EV charging stations do not resell electricity and therefore would not violate the tariff by charging for EV charging on a $/kWh basis.

Q: What do you recommend?

A: ChargePoint respectfully recommends and requests that, in the final order of this proceeding, the Commission state that the sale of EV charging services by non-utilities shall not be considered resale of electricity.

V. CONCLUSION

Q: Please summarize your recommendations to the Commission.

A: I recommend that the Commission:

- Approve Georgia Power's proposed investments in community charging facilities and EV charging infrastructure upgrades across the state;
- Approve Rider CIEV-1 and direct Georgia Power to allow any qualifying customer to take service on it (not just new customers);

[6] See Proposed Rule for the National Electric Vehicle Infrastructure Formula Program at § 680.116, (pub. June 22, 2022), available at: https://www.federalregister.gov/documents/2022/06/22/2022-12704/national-electric-vehicleinfrastructure-formula-program.

- Clarify that the sale of EV charging services by non-utilities shall not be considered resale of electricity.

Q: Does this conclude your direct testimony?

A: Yes.

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CERTIFICATE OF SERVICE

I hereby certify that I have served the following parties with the foregoing Direct Testimony of Justin D. Wilson on behalf of ChargePoint, Inc. via electronic mail as follows:

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