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Executive Director

Public Service Commission of Wisconsin
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Ms. Steffany Powell Coker
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53701-7854

RE: Investigation of Electric Vehicle Policy and Regulation

Docket: 5-EI-156

Dear Secretary Coker:

This letter is written on behalf of the member utilities of Municipal Electric Utilities of Wisconsin in response to the Commission's request for comment in the above entitled docket.

Municipal electric utilities across Wisconsin support efforts to promote electric vehicle (EV) infrastructure and the increased use of electricity for transportation purposes. As evidenced by the Commission's lengthy set of questions in this investigation, there are many issues to consider. We appreciate the Commission's effort to explore the impact of EVs on electric utility service in the state.

First and foremost, municipal utilities believe it is important to carefully establish parameters for the ownership and operation of EV infrastructure. Specifically, EV charging providers should be required to purchase the electricity for EV charging services from the electric utility assigned to the EV charging provider's local service area. Further, charging services for commercial customers should be separately metered to support effective load management.

Third-party ownership of EV infrastructure is a subject that requires thorough review. Reasonable regulation and oversight will be necessary to ensure "public utility" remains properly defined and consumers are appropriately protected. EVs are frequently characterized as "game-changers." Some municipal utilities have invested in charging infrastructure and some now have EVs as part of their fleet. Other utilities in the state have taken similar steps to understand this emerging space. It's important that we apply the early learnings to ensure future changes are thoughtfully considered.

As the EV market continues to mature, utilities will want to offer rate structures that encourage optimal EV charging. One of our member utilities, Sun Prairie Utilities (SPU), recently proposed a new Optional Residential Nighttime Service Schedule that incentivizes EV owners to charge at home between 10 p.m. and 6 a.m. The SPU proposal is emblematic of the type of creative rate design that will be needed to effectively leverage existing electric delivery infrastructure while EV adoption accelerates.

Municipal utilities can play an important role in deploying EV infrastructure, the costs of which should be fully recovered. We have heard talk about establishing a "corridor" to enable EV users to charge their vehicle along interstates and major thoroughfares. Each of the 81 communities that own and operate their electric utility could consider a locally-owned charging network supporting main street business – a convenience that promotes economic development for those who travel along highways and byways through more rural areas.

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If the growth estimates are to be believed, the EV market is ripe for opportunity. It is critically important that public charging infrastructure be carefully planned to maintain the integrity of the electric system in the face of increased demand. The need for at-home charging is likely to increase as well. Some of our member utilities have begun discussions to potentially modify municipal building codes and require circuitry to support EV charging, especially for multi-family dwellings, to avoid more costly retrofitting in the future.

The answers to today's questions can't possibly anticipate every future scenario as the EV market evolves. To that end, we encourage the Commission to charter an Electric Vehicle Working Group (EVWG) to help ensure ongoing collaboration and offer timely insights from industry experts and interested stakeholders. Properly organized, the EVWG could use the findings from this investigation to proactively develop a roadmap that would strengthen Wisconsin's leadership in EV adoption. Over time, we believe the EVWG has the potential to be a valuable resource to the Commission, its staff and other state agencies.

Please contact me directly with any questions Commission staff may have regarding these comments. We look forward to the next steps in the investigation proceeding.

Sincerely,

A handwritten signature in black ink, reading "Tim Heinrich". The signature is written in a cursive, flowing style with a large initial "T".

Tim Heinrich
Executive Director